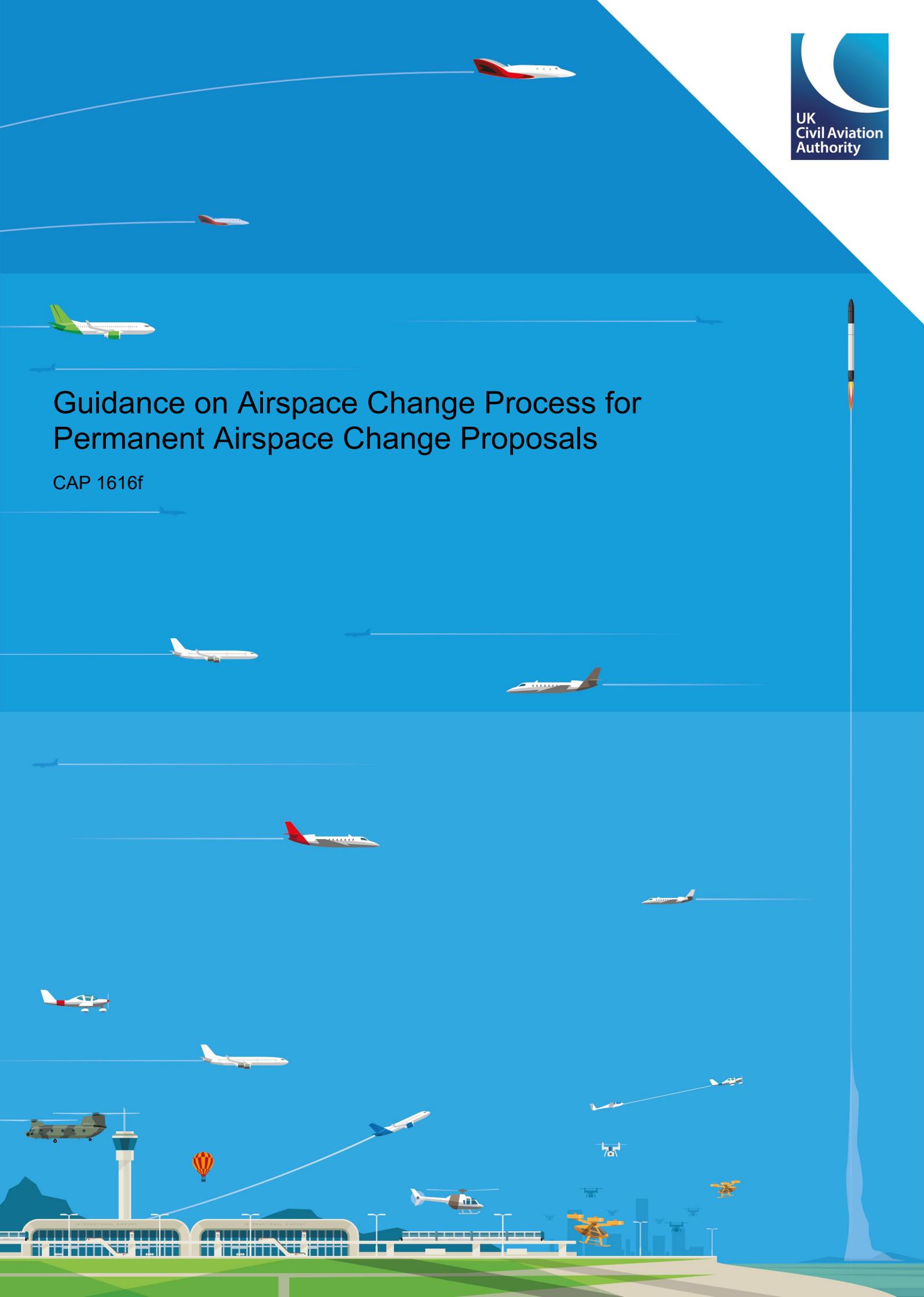


Guidance on Airspace Change Process for Permanent Airspace Change Proposals

CAP 1616f



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Revision history

1. In response to feedback received during the review of the CAP 1616 airspace change process we have delivered a package of improvements that makes the airspace change process easier to understand and clarifies the requirements needed to be met to progress an airspace change proposal. As part of those improvements, we have separated the process requirements contained in the fifth edition of CAP 1616, Airspace Change Process from the guidance on how to achieve those requirements.
2. This document provides the guidance for change sponsors on how to achieve the process requirements set out in CAP 1616, Airspace Change Process.

Chapter 1

Introduction

Who is this Document for?

- 1.1 This document is predominantly written for change sponsors. However, anyone can sponsor an airspace change proposal, although it is most often an airport/spaceport operator, an air navigation service provider or a potential operator of a new or innovative aircraft type. In some cases, the change sponsor will work in partnership with other organisations (for example, aviation/airspace consultancy firms, approved procedure design organisations) when developing their airspace change proposal. However, the change sponsor remains solely responsible for complying with the airspace change process, and any UK and international airspace design policy requirements that they are required to take account of when developing their airspace change proposal. This document may also be of benefit to others who have an interest in the airspace change process.

Purpose of the Document

- 1.2 This document provides guidance on the airspace change process for permanent airspace change proposals. It has been developed to complement the contents of [CAP 1616, Airspace Change Process](#) by providing guidance on the specific requirements and activities throughout the seven stages of the airspace change process.
- 1.3 This guidance document should not be read in isolation, and all readers should read CAP 1616, Airspace Change Process before referring to this document.

How can the Civil Aviation Authority (CAA) Provide Guidance?

- 1.4 The CAA is the airspace regulator and primary decision-maker, and responsible for administering the airspace change process and providing guidance on the process to stakeholders. The CAA must develop this process in accordance with directions and environmental guidance provided by the Secretary of State. Additionally, the process is designed to enable the CAA to comply with its statutory duties.
- 1.5 Throughout the development of an airspace change proposal, change sponsors may seek guidance on the requirements of the process from the CAA's Airspace Regulation team. However, the most appropriate opportunity to provide change sponsors with guidance is following a gateway. The basic premise of the CAA providing guidance is that it is focussed on offering information and support to change sponsors on the application of the airspace change process and understanding their responsibilities, technical matters relating to airspace

change, highlighting appropriate policy requirements and other exemplar airspace change proposals.

- 1.6 It is important to note that this guidance does not constitute advice on the specific course of action change sponsors should take. However, there may be circumstances where we are required to direct the change sponsor to address specific matters such as a safety-related issue or compliance with national and international regulations and government policies. In such cases, we will clearly communicate the reasons for the guidance and publish it on the airspace change portal.

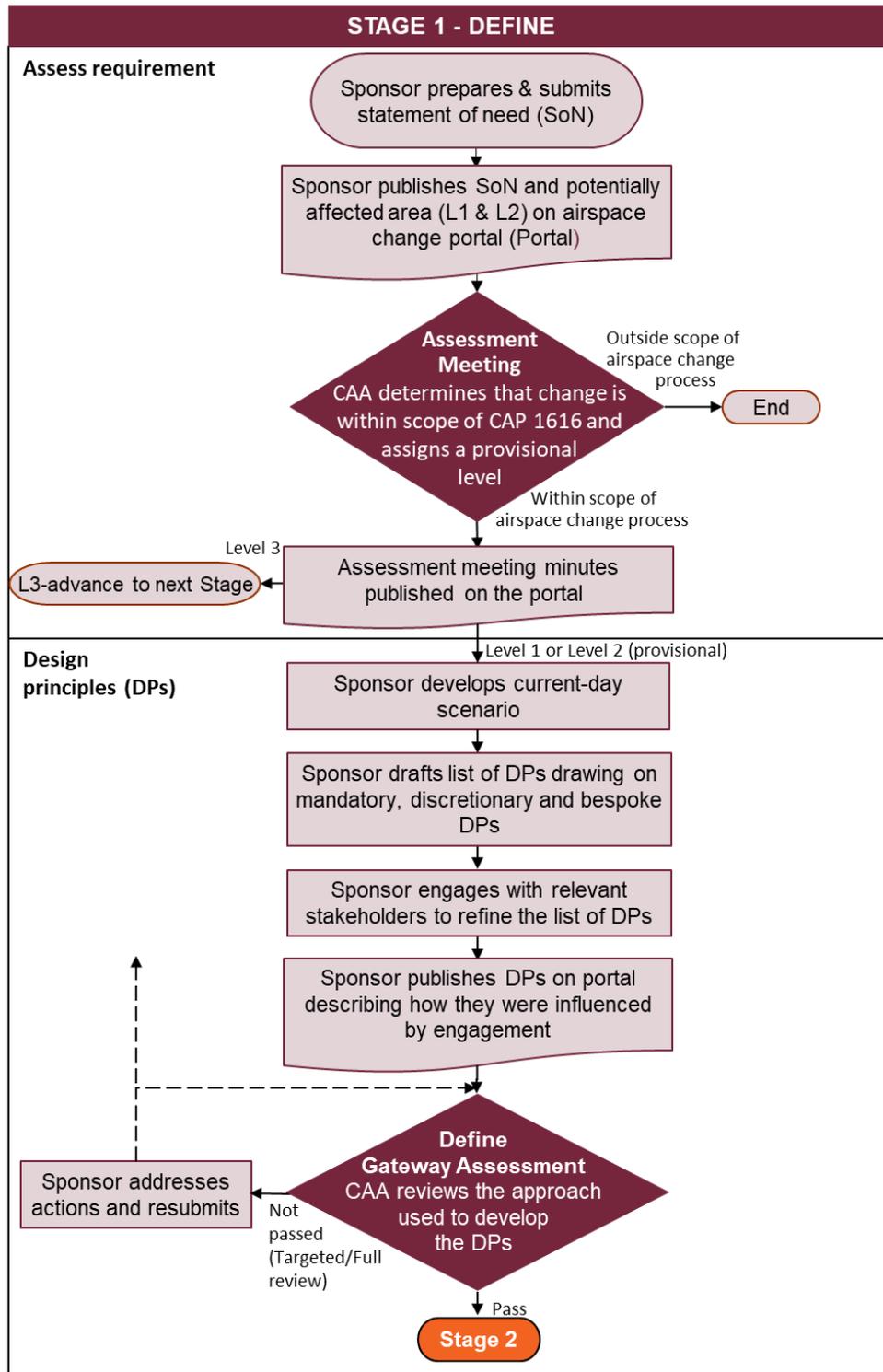
Definitions

- 1.7 Throughout this document, the degree of compliance expected is based on the following definitions:
- **'will'** or **'must'** is used to refer to requirements that **must** be met in full, unless it has been agreed in advance with the CAA that it would be disproportionate to do so
 - **'should'** is used to refer to a requirement that is expected to be met in full, unless the change sponsor provides an acceptable rationale (within their submissions) that it would be disproportionate to do so
 - **'may'** is used to refer to an action that the change sponsor is encouraged to consider taking. Given the unique circumstances of each airspace change proposal, there **may** be instances where we might instruct the change sponsor to take specific action.

Chapter 2 Stage 1 - DEFINE

Process Overview

Figure 1 Stage 1 (define) process overview



Introduction

- 2.1 The first stage of the airspace change process, the 'define' stage, is where the change sponsor submits a statement of need setting out the objectives of their airspace change proposal and the airspace issues or opportunities that it seeks to address. We will facilitate an assessment meeting to discuss the statement of need, and subject to the CAA accepting that the airspace change process is the appropriate mechanism to achieve the objectives of the airspace change proposal and address the airspace issues or opportunities, the change sponsor will go on to develop the current-day scenario and design principles.
- 2.2 We regard Stage 1 as the initiation of the airspace change process. It requires the change sponsor to identify the need for an airspace change proposal, so that all stakeholders can understand their rationale for pursuing an airspace change. It also exists for the CAA to confirm that the airspace change proposal falls within scope of the airspace change process.
- 2.3 Stage 1 is completed when the airspace change proposal passes through the 'define' gateway.

Scaling of Stage 1

- 2.4 A statement of need and assessment meeting will be required for all airspace change proposals. However, it may be possible to achieve the objectives of the assessment meeting in various ways (for example, in-person or remote meetings, or by email correspondence) depending on the scale and impacts of the airspace change proposal (and therefore provisional level).
- 2.5 An entry on the airspace change portal will be required for all airspace change proposals and the change sponsor must ensure that the status is set to 'in progress'. A potentially affected area must be added for Level 1 airspace change proposals and should be considered for Level 2 and Level 3 airspace change proposals.
- 2.6 Change sponsors must develop the current-day scenario for all airspace change proposals, as it provides a clear description of the current aviation activity and associated impacts and sets the context for all stages of the airspace change process. The information that must be included will be determined by the level of airspace change proposal as follows.
- 2.7 Airspace change proposals provisionally assigned as Level 1, Level 2 and Level 3 must use the mandatory design principles. For Level 1 and Level 2 airspace change proposals, change sponsors must also consider the applicability of discretionary design principles. To ensure that local context and circumstances are considered, the change sponsor must also consider developing bespoke design principles.

- 2.8 For Level 1 and Level 2 airspace change proposals, change sponsors must share their current-day scenario and list of design principles with relevant stakeholders and seek feedback to inform the content and development of these outputs. For Level 3 airspace change proposals, change sponsors must inform relevant stakeholders accordingly. Military change sponsors are only required to engage with elected representatives and/or groups representing communities if the airspace change proposal is likely to have a consequential impact on civil air traffic operating below 7,000 feet.
- 2.9 There is no requirement for Level 3 airspace change proposals, temporary airspace change proposals or airspace trials to pass through the 'define' gateway.
- 2.10 The provisional level is assigned to the airspace change proposal after the assessment meeting but will not be confirmed until the end of Stage 2. Therefore, Stage 1 may need to be revisited if an airspace change proposal is provisionally assigned as Level 2 or Level 3 but confirmed as Level 1 at the Stage 2 gateway. This is a rare occurrence in cases where a change sponsor identifies at Stage 2 that its airspace change proposal potentially has a larger impact than originally anticipated.

Statement of Need

The change sponsor **must** complete and submit the DAP1916 – statement of need, ensuring that it includes the objectives of the airspace change proposal, the airspace issues or opportunities to be addressed and the current/existing situation

- 2.11 The statement of need is used to initiate the airspace change process by identifying the need for airspace change. To help the CAA determine whether the airspace change process is the appropriate mechanism, we need to understand the objectives of the airspace change proposal, the airspace issues or opportunities to be addressed and the current/existing situation. The CAA expect to see the following information within the statement of need:
- a summary statement detailing the objectives and intended outcomes, that is design changes required and a description of the anticipated changes
 - a summary statement of the airspace issues or opportunities that the airspace change proposal is seeking to address, including, if known at this stage, any safety, operational, technical, environmental or economic factors
 - a brief description of the current airspace design (today's airspace structure, flight procedures and flight behaviours/patterns) and a recent history of any related airspace design changes relevant to the airspace change proposal

- a brief description of the current prevailing air traffic situation (frequency and number of aircraft movements, including civil traffic for airspace change proposals sponsored by the Ministry of Defence) and an indication of estimated forecast traffic growth over a period of 10 years from the intended year of implementation
- a brief description of the area potentially affected by the airspace change proposal as identified on the airspace change portal, including any specific characteristics of the surrounding environment.

2.12 Below are some examples of airspace issues or opportunities where an airspace change proposal may be an appropriate response:

- a safety event that highlights a requirement for an airspace change proposal to mitigate risk
- improving access for all or for a specific category (or categories) of airspace user to airspace
- reducing noise or other environmental impacts
- improving airspace efficiency or increasing the capacity of the airspace system
- enabling new operational capabilities for new aircraft or air traffic management technology
- a change in legislation
- significant changes to traffic flows
- military requirements, such as a new aircraft type
- new or changed aviation infrastructure, such as a change in runway length/orientation or installation/removal of ground-based infrastructure.

2.13 An airspace change proposal is characterised by a change to the notified airspace design as published in the UK Aeronautical Information Publication. Examples include:

- a change in the classification of the airspace
- new, or changes to, instrument flight procedures (standard instrument departures, standard arrival procedures, instrument approach procedures)
- new, or changes to, air traffic service routes or en-route holds
- new, or changes to, the lateral or vertical dimensions of, special use airspace such as danger areas, restricted areas, prohibited areas, temporary reserved areas, or temporary segregated areas
- changes to the hours of operation of existing airspace structures

- delegated provision of air traffic services to an adjacent State.

- 2.14 The statement of need must be submitted to the CAA by the change sponsor via the [DAP1916 - statement of need](#) form. We will acknowledge receipt and email a version to the change sponsor along with a unique reference number (ACP-YYYY-XXX) so that it can be published on the airspace change portal. Personal information such as names, telephone numbers and email addresses must be redacted on the published version. We will also consider allowing the change sponsor to redact commercially sensitive or national security material from the published version.
- 2.15 For all airspace change proposals, we will assign an account manager from the Airspace Regulation team, who will contact the change sponsor to set up an assessment meeting and be the primary point of contact for the change sponsor throughout the airspace change process.

Airspace Change Portal

The change sponsor **must** create an entry for their airspace change proposal

- 2.16 The airspace change portal holds relevant information and documentation for each airspace change proposal. Detailed guidance on how to set up an airspace change portal account and create an airspace change proposal entry will be provided upon submission of a statement of need.

The change sponsor **must** add a potentially affected area (**should** for Level 2)

- 2.17 The airspace change portal allows stakeholders to search by location for airspace change proposals that could have an impact on them. This functionality is driven by the addition of a potentially affected area, which is determined by the scope and characteristics of the airspace change proposal.
- 2.18 The potentially affected area can be developed by using a combination of the following shapes:
- circle: Latitude and longitude of the centre point is recorded, with radius calculated and recorded in metres
 - rectangle: Latitude and longitude of northwest and southeast points are recorded
 - polygon with unlimited points: Latitude and longitude are recorded for each point entered.

The change sponsor **must** ensure that the status is set to 'in progress'

- 2.19 When an airspace change proposal is created, its status is set to 'pre-published'. This status means that it is not visible to stakeholders, and it cannot be progressed through the airspace change process. Once the airspace change proposal has been created, the status must be set to 'in progress' so that it becomes visible to all stakeholders. Change sponsors may add a status comment to provide additional context, noting that this will be visible across each stage until it is either removed or replaced.

Assessment Meeting

The change sponsor **must** deliver a briefing to the CAA on the objectives of the airspace change proposal, the airspace issues or opportunities giving rise to it, the current/existing situation and proposed next steps

- 2.20 Each airspace change proposal is different. The assessment meeting allows the change sponsor to explain the airspace issues and opportunities giving rise to the airspace change proposal, its objectives, and proposed next steps. This will include the potential merits of the airspace change proposal, for example in terms of safety, efficiency, capacity, increasing access for all or specific categories of airspace users, delivering elements of the CAA's airspace modernisation strategy, providing environmental benefits or mitigating its environmental impact to the greatest extent possible.
- 2.21 If we determine that the airspace change process is the appropriate mechanism for resolving the airspace issue or opportunity, the assessment meeting provides an opportunity for the CAA to offer advice and guidance on what the airspace change process will require from the change sponsor and how we will evaluate the outputs throughout. The assigned account manager will ensure that the appropriate CAA regulators (safety, operational, instrument flight procedure, engagement and consultation, economic and environmental) are available to participate in any assessment meeting.
- 2.22 We will provide a template agenda for the assessment meeting, the purpose of which is to discuss the statement of need and determine:
- whether the change sponsor has identified an airspace issue or opportunity that could reasonably be resolved by a change to the notified airspace design
 - the provisional 'level' assigned to the airspace change proposal, where it is agreed that the airspace change process is the appropriate mechanism for resolving the airspace issues or opportunities
 - what alternative method of resolution should be progressed if it is determined that the airspace change process is not the appropriate mechanism for resolving the airspace issues or opportunities.

- 2.23 For some airspace change proposals where the impact is low, a tailored form of consultation - engagement - may be appropriate during Stage 3. If this is the change sponsor's intention, then the rationale for this approach should be presented during the assessment meeting.
- 2.24 If the provisional Level is 3, the level should be confirmed during, or shortly after, the assessment meeting. However, on some occasions the CAA may need to better understand the characteristics of the airspace change proposal and the potential impacts before it can make a determination. If an airspace change proposal cannot initially be confirmed as Level 3, it will be re-assigned as a provisional Level 1 or 2 until such time as the CAA can be satisfied that it can be confirmed as Level 3. Notwithstanding that provisionally assigned level, the requirements of the airspace change process may be scaled when the CAA considers it proportionate to do so.
- 2.25 There may also be a discussion on how the airspace change process could be scaled. Requests from the change sponsor to consider scaling the airspace change process requirements of the relevant level will be considered on a case-by-case basis and will be influenced by the potential impacts of the airspace change proposal.

The change sponsor *must* provide an indicative timeline detailing target dates for each gateway and submission of the airspace change proposal, CAA decision and implementation

- 2.26 For all airspace change proposals, the change sponsor will also be required to provide a timeline detailing their proposed dates for each gateway (provisional Level 1 and Level 2 airspace change proposals only), submission of the airspace change proposal, CAA decision and implementation. We will review the change sponsor's timeline, taking into consideration pre-existing workload and capacity before determining whether it can be accommodated. An alternative timeline may need to be discussed before it can be agreed and approved by the CAA.
- 2.27 The change sponsor's target implementation date will be the key determinant when developing timelines. Once this has been decided, the change sponsor should refer to the UK [Aeronautical Information Services publication schedule](#) to establish when a change request must be submitted to meet the target implementation date. The cut-off date for submission of the change request is usually 90 days before the effective date, with publication usually 42 days before the effective date. Some large or complex airspace change proposals may require a 'double AIRAC', whereby publication is required at least 56 days before the effective date. The CAA is not responsible for meeting timetables such as achieving a specific AIRAC cycle but we are able to provide additional advice about how they can affect timelines.

- 2.28 Coordination is often required at the UK's international borders and with other civil and military authorities. Some AIRAC cycles may also be less available to change sponsors due to NATS en-route system builds. This can mean that high impact airspace changes are only implemented in the quieter traffic periods that occur over winter, which means implementation is time sensitive. Change sponsors should engage early with the UK Aeronautical Information Service to understand which AIRAC cycles might be unavailable to them, particularly for complex airspace changes that may result from the airspace change proposal.
- 2.29 When proposing a timeline change sponsors must provide a target AIRAC cycle number, along with relevant cut-off dates and effective dates. Aeronautical information circulars can be used to provide amplifying information about the implementation of an airspace change, while notification could be made through an aeronautical information publication supplement and/or a notice to aviation (NOTAM). Change sponsors should consider whether their airspace change proposal impacts the air traffic service route network or other structures and consider whether any change should be managed by the Airspace Management Cell. If the airspace change proposal is likely to be an Airspace Management Cell managed area, the change sponsor will be required to liaise with the Airspace Management Cell to determine how the activation and deactivation will be managed.
- 2.30 Agreement on the timeline must also have regard to activities required by other parties (including approved procedure design organisations) and CAA resources, particularly with regards to the safety assessment requirements. The nature of the safety assessment will depend on the specific activity driving the requirement for the airspace change proposal. It may, for example, take the form of an operational safety case required for the CAA to consider granting an operational authorisation for remotely piloted aircraft systems (commonly referred to as drones), or a flight safety assessment required for the CAA to consider granting a specific licence for spaceflight activities. When planning a timeline to achieve implementation of an airspace change proposal, change sponsors must plan sufficient time to achieve and where applicable coordinate any such related authorisations.
- 2.31 Should it become apparent that a change sponsor is unable to meet their agreed submission date for a gateway, they must notify their assigned account manager at the earliest opportunity so that a new timeline can be negotiated, noting that any change sponsor led amendment to the timeline will require additional justification. In any such case, the change sponsor must submit a 'timeline change request' form to their assigned account manager so that it can be considered accordingly. Once agreed, the new timeline must be published on the airspace change portal.

The change sponsor **must** develop the output from the assessment meeting

- 2.32 In the interests of transparency, the change sponsor must develop a record of what was discussed and agreed with the CAA. The output must be accepted by the CAA before being published on the airspace change portal. We would routinely expect the output to be published within two weeks of the assessment meeting.
- 2.33 We will publish our determination on the airspace change portal on whether the airspace change process is the appropriate mechanism for resolving the airspace issues or opportunities as well as on the provisionally assigned level of the airspace change proposal.

The change sponsor **must**, where required, submit and publish updated versions of the statement of need on the airspace change portal, ensuring that they are clearly identified by a version number

- 2.34 Should the CAA determine that the information provided in the statement of need is insufficient, the change sponsor may be asked to revise its contents and submit an updated version after the assessment meeting. In any such case, the change sponsor must ensure that the updated version is published on the airspace change portal and clearly include a version number.

Current-Day Scenario

The change sponsor **must** describe the current-day scenario

- 2.35 The current-day scenario provides a clear description of the current impacts and sets the context for all stakeholders. This will inform the selection and development of relevant design principles to be applied to the proposed airspace design options at Stage 2.
- 2.36 The change sponsor must include the following information within their current-day scenario:
- airspace design: current structures, routes and instrument flight procedures and flight behaviours/patterns
 - airspace usage survey and analysis: current airspace users, aircraft types, frequency/number of movements, typical altitudes
 - overflight and operational diagrams
 - operational efficiency, complexity, delays and choke points
 - any potential safety risks

- local features below 7,000 feet: designated areas such as Air Quality Management Areas (AQMA), National Parks, Areas of Outstanding Natural Beauty (AONB), National Scenic Areas (NSA), designated Quiet Areas, etc.
- European sites overflowed below 3,000 feet: Special Areas of Conservation (SAC) and possible SACs, Special Protection Areas (SPA) and potential SPAs, Ramsar sites (wetlands of international importance) and proposed Ramsar sites; and compensatory habitat (areas secured to compensate for damage to SACs, SPAs and Ramsar sites)
- environmental impacts relevant to the airspace change proposal including current-day noise and local air quality impacts on people, greenhouse gas emissions, tranquillity and biodiversity
- local context: planning agreements, conditions and other relevant agreements (for example, section 106 of the Town and Country Planning Act 1990 agreements), noise action plans, noise preferential routes or noise abatement procedures relevant to the airspace change proposal.

2.37 Design principles relevant to the objectives of the airspace change proposal are therefore identified and developed on the basis of this collected information, and then used to establish a framework against which the design options are developed and assessed in the subsequent stages of the airspace change process. The Air Navigation Guidance 2017 states that “...decisions which affect how aircraft noise is best distributed should be informed by local circumstances and consideration of different options.” Consequently, the current-day scenario forms an important part of the change sponsor’s engagement activities.

Design Principles

The change sponsor **must** develop a list of design principles to provide a framework against which design options can be developed and evaluated

- 2.38 Design principles provide a framework to support the development of the options to address the statement of need and therefore they must be informed by the objectives and intended outcomes as set out on the change sponsor’s statement of need. They must (should for Level 2 airspace change proposals) also adequately cover the criteria that will be used to inform the subsequent development of design options and design principle evaluation that must be developed by the change sponsor in Stage 2.
- 2.39 The design principles themselves will not determine whether the airspace change proposal is acceptable or not. However, they do form an important part of the CAA’s assessment as well as being part of the information available to us when we make our decision (Stage 5).

- 2.40 Language is a key factor in determining the prioritisation of design principles, and therefore change sponsors must carefully consider the use of 'must' or 'should' when modifying discretionary design principles or drafting bespoke design principles.
- 2.41 Design principles are often written as high-level statements and so supporting context can be beneficial to help stakeholders understand what they mean and how they will be used to support the development of design options in Stage 2. Therefore, change sponsors should consider supplementing their design principles with supporting narrative to provide additional context.
- 2.42 When developing their design principles, change sponsors are encouraged to proceed only with those that are essential to support the development of design options in Stage 2, as a longer list of design principles can introduce complexity.

The change sponsor **must** use the mandatory design principles (MDP)

- MDP Safety - The airspace change proposal must maintain a high standard of safety and should seek to enhance current levels of safety.
- MDP Policy - The airspace change proposal should not be inconsistent with relevant legislation, the CAA's airspace modernisation strategy or Secretary of State and CAA's policy and guidance.
- MDP Environment - The airspace change proposal should deliver the Government's key environmental objectives with respect to air navigation as set out in the Government's Air Navigation Guidance 2017.

The change sponsor **must** consider using the discretionary design principles (DDP)

- DDP Operational (Resilience) - The airspace change proposal should maintain or enhance operational resilience of the air traffic service system.
- DDP Operational (Capacity) - The airspace change proposal should provide the greatest capacity benefits.
- DDP Technical (Ministry of Defence requirements) - The airspace change proposal should be compatible with the requirements of the Ministry of Defence.
- DDP Technical (Accessibility for all airspace users) - The airspace change proposal should satisfy the requirements of operators and owners of all classes of aircraft, including general aviation and other civilian airspace users.
- DDP Technical (Other aviation stakeholders) - The airspace change proposal should consider the impacts on air navigation service providers and other aviation stakeholders such as nearby airport operators.

- DDP Technical (Controlled airspace) - The volume and classification of controlled airspace required for the provision of air traffic control services to IFR flights should be the minimum necessary to deliver an efficient airspace design, taking into account the needs of other airspace users.
- DDP Technical (Performance based navigation) - The proposed routes (instrument flight procedures/air traffic service routes) should be designed to enable efficiency benefits by using an appropriate standard of performance based navigation.
- DDP Economic (Performance) - The airspace change proposal should contribute to economic growth, development and/or improved productivity amongst businesses, individuals, government or third sector organisations.
- DDP Environment (Local context and circumstances) – The airspace change proposal must be informed by local context and circumstances.
- DDP Environment (Noise) – The airspace change proposal should limit and, where possible, reduce the total adverse effects from aircraft noise from the ground to below 4,000 feet.
- DDP Environment (Noise) - Where options for route design for the airspace change proposal from the ground to below 4,000 feet are similar in terms of the number of people affected by total adverse noise effects, preference should be given to that option which is most consistent with existing published airspace arrangements.
- DDP Environment (Sharing of noise) – The airspace change proposal should concentrate traffic on single routes which normally reduce the number of people overflown.
- DDP Environment (Sharing of noise) – The airspace change proposal should disperse traffic on multiple routes which can potentially provide relief or respite.
- DDP (Noise and greenhouse gas emissions) – The airspace change proposal should limit and, where possible, reduce the total adverse effects from aircraft noise at or above 4,000 feet to below 7,000 feet, unless there is a disproportionate increase in greenhouse gas emissions.
- DDP Environment (Greenhouse gas emissions) - The airspace change proposal should minimise greenhouse gas emissions at or above 7,000 feet.
- DDP Environment (Local air quality) - The airspace change proposal should minimise local air quality emissions (Oxides of nitrogen (NOx) and particulate matter (PM)) below 1,000 feet and as a minimum must not increase or lead to a breach, or worsening of an existing breach, of legal air quality limit values.

- DDP Environment (Tranquillity) – The airspace change proposal should limit and, where possible, reduce overflight of National Parks, Areas of Outstanding Natural Beauty (AONB), National Scenic Areas (NSA), designated Quiet Areas and any other locally identified tranquillity areas below 7,000 feet.
- DDP Environment (Biodiversity) - The airspace change proposal should minimise impacts on European sites and any other locally identified biodiversity areas.

2.43 Change sponsors should use this list to support the development of their design principles, selecting those which they feel are applicable to their airspace change proposal. A change sponsor may opt to change the wording of the discretionary design principles listed above.

The change sponsor **must** consider developing bespoke design principles

2.44 Where necessary, the change sponsor can add separate bespoke design principles in addition to the mandatory and discretionary design principles. The bespoke design principles give the change sponsor the capability to develop any design principles that are specific to the local context and circumstances of individual airspace change proposals.

The change sponsor **must** consider both local context and national policy when developing the list of design principles

2.45 The design principles must be developed in a local context, and in accordance with national policy. They must take account of government policy documents and any local criteria such as planning agreements, conditions and other relevant agreements (for example, under section 106 of the Town and Country Planning Act 1990), noise action plans, noise preferential routes or other noise abatement procedures imposed on the airport by the Secretary of State under section 78 of the Civil Aviation Act 1982 or by the Local Planning Authority.

The change sponsor **must** identify any local circumstances and competing priorities that may need to be considered when developing the list of design principles

2.46 The design principles must address any local competing priorities that need to be made, for example by considering whether aircraft should, as a priority, avoid flying over specific local areas or populations. The change sponsor must therefore undertake relevant engagement with local authorities and other relevant stakeholders.

2.47 Some of the design principles may contradict one another and some may be prioritised over others: this will be an iterative process and a qualitative one rather than a purely numerical exercise with binary answers.

Stakeholder Engagement

The change sponsor **must** identify relevant stakeholders

- 2.48 As there will not be clarity on the potential impacts of the airspace change proposal at this stage of the airspace change process, we would expect the change sponsor to primarily focus their engagement at the representative level. Such groups will often be people with whom the change sponsor has an ongoing relationship and are able to help contextualise the development of the design principles.
- 2.49 We would expect the change sponsor to identify relevant stakeholders from the following categories:
- directly affected local aviation stakeholders, including airspace users, airline operators, air navigation service providers and airports/spaceports
 - members of an airport's consultative committee, where relevant
 - members of the National Air Traffic Management Advisory Committee
 - aviation/non-aviation national organisations, including those which represent areas/interests likely to be affected by potential impacts
 - where Air Quality Management Areas (AQMA), National Parks, Areas of Outstanding Natural Beauty (AONB), National Scenic Areas (NSA), designated Quiet Areas and European sites are situated within areas likely to be affected by potential impacts, engagement is expected with the relevant representative organisations
 - elected representatives and/or groups representing communities likely to be affected by potential impacts (such as noise) associated with the airspace change (should for Level 2). Military change sponsors are only required to engage with stakeholders from this category if the airspace change proposal is likely to have a consequential impact on civil air traffic operating below 7,000 feet.
- 2.50 To help identify relevant stakeholders within the categories listed above, the change sponsor should consider the following questions:
- who is likely to be directly impacted?
 - who is likely to be indirectly impacted?
 - who is likely to be potentially impacted?
 - who might be able to provide access to specific audiences?
 - whose help might be needed?

- who knows about the subject and is likely to have an interest in it?

The change sponsor **must** consider the unique requirements of their stakeholders when developing their engagement methodology (approach and materials)

2.51 Having identified the relevant stakeholders, the change sponsor should consider the unique requirements of their stakeholders before developing their methodology (audience, approach, materials) to facilitate meaningful engagement regarding the current-day scenario and design principles. For example, bilateral meetings, participatory sessions and workshops are likely to be the most effective method of seeking meaningful contributions from stakeholders at this stage of the airspace change process. The change sponsor should also consider the possibility of neutral facilitation, particularly when developing bespoke design principles. Where agreement on the wording of discretionary and/or bespoke design principles is not reached and facilitation has not been tried, we may not be able to accept the change sponsor's design principles.

The change sponsor **must** share the current-day scenario and proposed design principles with relevant stakeholders so that they can comment accordingly, and take those comments into account

- 2.52 Change sponsors must present their current-day scenario and design principles to stakeholders so that they have the opportunity to comment on their suitability.
- 2.53 As detailed above, there may be instances where it is necessary to supplement the mandatory and discretionary design principles with bespoke design principles to ensure that the local context and circumstances of any individual airspace change proposal is adequately reflected. To achieve this, change sponsors of Level 1 and Level 2 airspace change proposals must engage with relevant stakeholders and seek their feedback to support the development of their design principles.
- 2.54 Engagement during this process is important – for the change sponsor to clearly communicate the objectives of their airspace change proposal and the airspace issues or opportunities they are seeking to address, and for those affected (particularly elected representatives and/or environmental interest groups representing communities) who must have the opportunity to explain what considerations are important to them, so that the change sponsor can ensure these are adequately reflected in their design principles. Examples may be predictable respite from noise for communities and airspace access for users of all types of aircraft including members of the general aviation or remotely piloted community.

- 2.55 Where applicable, the outcome will also record alternative design principles that were suggested by stakeholders, but not taken forward by the change sponsor, with reasoning as to why this was the case.

The change sponsor **must** explain the criteria that will inform and influence the development of design options, clearly setting out competing priorities and choice of design principles

- 2.56 When engaging with relevant stakeholders, the change sponsor must be clear about the criteria that will inform the development of design options, such as:
- the objectives of the airspace change proposal
 - safety constraints and/or opportunities
 - operational constraints and/or opportunities
 - technical constraints and/or opportunities
 - environmental constraints and/or opportunities
 - economic constraints and/or opportunities
 - the policy and regulatory framework with which the airspace change proposal must comply
 - local context and circumstances
- 2.57 Change sponsors must set out clearly the competing priorities and explain their choice of design principles based on this. We understand that it may not always be possible to achieve agreement across all stakeholders on the design principles. The outcome of this work will be a list of design principles to inform the development of design options against which they can be qualitatively evaluated.

The change sponsor **must** provide relevant engagement evidence

- 2.58 Change sponsors need to explain their engagement approach and methodology, and the decisions they have taken in response to the feedback received from stakeholders. We would therefore expect to receive the following output from this activity:
- a list of those stakeholders engaged and an explanation of how they were identified
 - an explanation of the engagement methodology (audience, approach, materials)
 - a chronology of the engagement activity

- an explanation of the feedback received during the engagement process and of how this has, or has not, influenced the content of the current-day scenario and/or list of design principles
- materials distributed by the change sponsor, meeting/workshop presentations and minutes (where applicable), and copies of related correspondence between the change sponsor and stakeholders where points of feedback have been raised and responded to
- the list of design principles chosen.

The change sponsor **must** demonstrate what they have heard and how this feedback has, or has not, informed the content of the current-day scenario and development of the design principles

2.59 Change sponsors must explain the rationale behind the decision to adopt the chosen design principles, including evidence of which were agreed by stakeholders and which were not. Where design principles have not been agreed, objections must be clearly set out and attributed to relevant stakeholders, as well as a clear rationale for the change sponsor's decision in light of this feedback (for example, a matrix or table illustrating how the design principles have evolved).

Stage 1 (Define) Gateway

The change sponsor **must** submit the required outputs to the CAA for assessment at the 'define' gateway and publish them on the airspace change portal

2.60 The 'define' gateway occurs at the end of Stage 1. At this point, we will complete our regulatory assessment of the change sponsor's outputs and relevant supporting evidence to determine whether the airspace change process requirements have been followed. There is no requirement for Level 3 airspace change proposals to pass a Stage 1 'define' gateway, rather after completing Stage 1 Level 3 requirements, the change sponsor can proceed directly to the Stage 2 Level 3 requirements.

Outputs Required During Stage 1

Before assessment meeting (produced and published by the change sponsor)

- statement of need (submitted to CAA)
- entry created on the airspace change portal, and status set to 'in progress'
- redacted statement of need published on the airspace change portal.

After assessment meeting (produced and published by the change sponsor)

- assessment meeting output (to include the proposed timescales for the airspace change process and the provisional level assigned by the CAA)
- updated statement of need submitted to the CAA and redacted version published on the airspace change portal (if applicable).

After assessment meeting (Produced and published by the CAA)

- determination on whether the airspace change proposal is in scope of the airspace change process (on airspace change portal).

Before 'define' gateway (produced and published by the change sponsor)

'define' gateway submission, including:

- current-day scenario
- list of design principles
- related engagement evidence
- completed submission checklist.

After 'define' gateway (produced and published by the CAA)

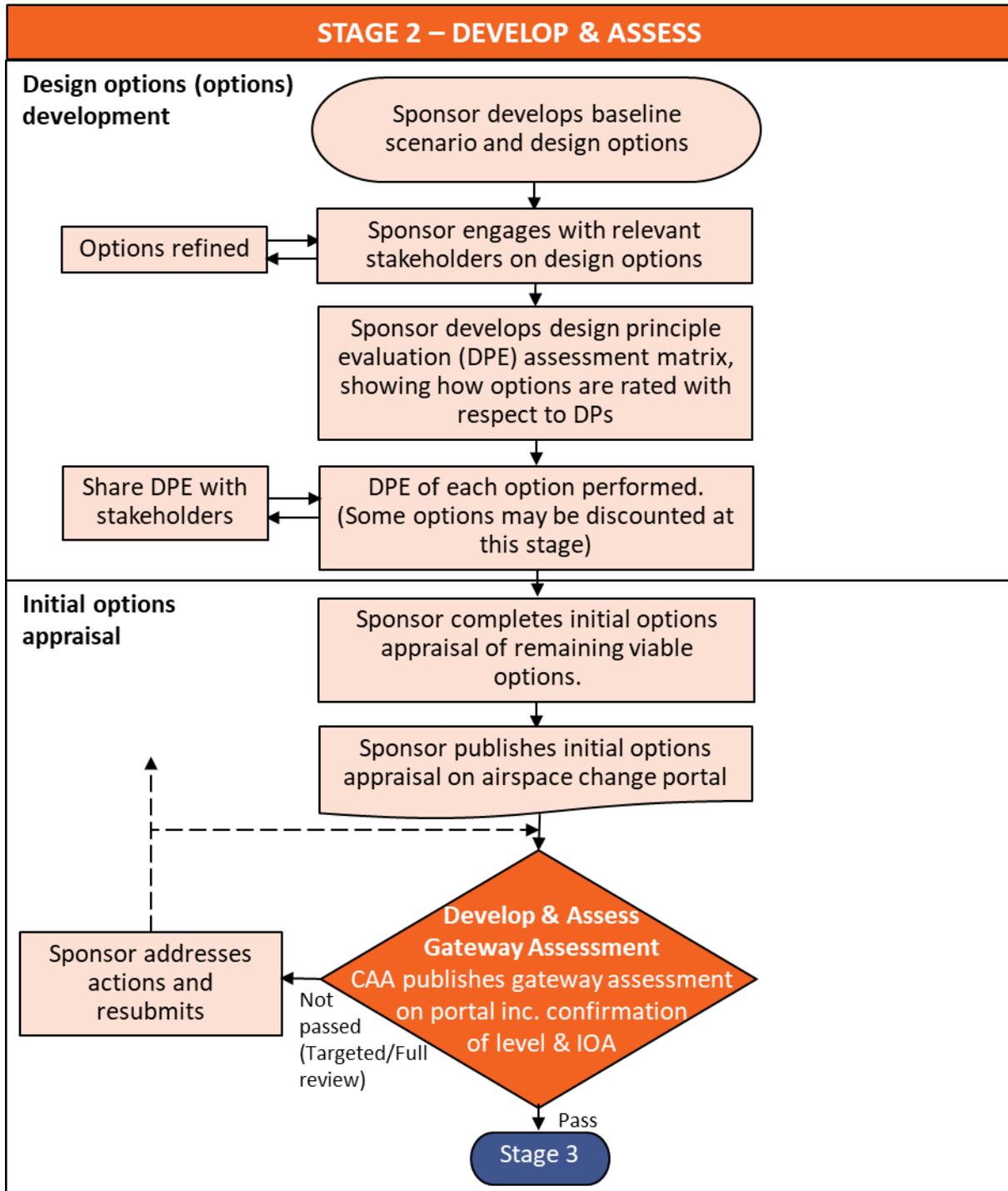
- 'define' gateway outcome.

Chapter 3

Stage 2 – DEVELOP and ASSESS

Process Overview

Figure 2 Stage 2 (develop and assess) process overview



Introduction

- 3.1 Having passed the 'define' gateway, the change sponsor moves on to the 'develop and assess' stage.
- 3.2 This is where the change sponsor develops the baseline scenarios and design options for the airspace change proposal. The design options address the statement of need and align with the criteria from the design principles developed and submitted in Stage 1. The change sponsor is then required to share the baseline scenarios and design options with relevant stakeholders so that they have the opportunity to comment accordingly. The change sponsor will go on to conduct a design principle evaluation to evaluate the baseline scenarios and design options against each of the design principles before conducting an initial options appraisal on the impacts of each design option.
- 3.3 Stage 2 is completed when the airspace change proposal passes through the 'develop and assess' gateway.

Scaling of Stage 2

- 3.4 The requirements for the 'develop and assess' stage can be scaled, but it should be noted that the level is only confirmed at the end of Stage 2. The requirements may also be further scaled within the levels where proportionate to do so and subject to the minimum criteria set in CAP 1616, Airspace Change Process and by the Secretary of State. Earlier stages of the airspace change process may need to be revisited if the level confirmed at the conclusion of Stage 2 differs from that provisionally assigned following the Stage 1 assessment meeting.
- 3.5 While baseline scenarios and design options must be developed for all airspace change proposals, we will consider evidence and supporting rationale provided by change sponsors to justify where single or limited design options have been presented. For airspace change proposals where there is a single design option only (other than the baseline scenarios), initial options appraisal and full options appraisal requirements can be consolidated.
- 3.6 For Level 1 airspace change proposals, change sponsors must share the baseline scenarios and design options with relevant stakeholders and seek feedback to inform the content and development of these outputs. Change sponsors of Level 2 airspace change proposals should undertake this activity.
- 3.7 As all airspace change proposals must use the mandatory design principles, change sponsors must complete a design principle evaluation.
- 3.8 For Level 1 and Level 2 airspace changes proposals, change sponsors must complete the initial options appraisal, as this is an essential piece of evidence in understanding the impacts of the airspace change proposal.

- 3.9 Please refer to [CAP 1616i, Environmental Assessment Requirements and Guidance for Airspace Change Proposals](#) for further requirements, guidance on performing and scaling environmental assessments (where applicable).
- 3.10 There is no requirement for Level 3 airspace change proposals to pass through the 'develop and assess' gateway.

Baseline Scenarios and Options Development

The change sponsor **must** develop the baseline scenarios

- 3.11 The change sponsor must undertake an assessment of the impacts of the future scenario without the airspace change so that a comparison can be made against the impacts of the design options.
- 3.12 Because of the time needed to go through the airspace change process and implement change, the future scenario without airspace change will need to assume the current-day airspace situation (that is, airspace structures and behaviours) but reflect other changes to the use of the airspace independent of the proposed airspace change, for example, traffic growth and fleet changes that occur as part of business as usual. The future scenarios without the airspace change must also take account of anticipated changes to the types of aircraft operating in the airspace. Throughout this guidance, baseline scenarios is the term used to refer to these future scenarios without the airspace change and are developed for:
- year of implementation without the airspace change proposal (year 1); and
 - 10-years after implementation without the airspace change proposal (year 10).
- 3.13 The baseline scenarios must also be considered in relation to their context which may be changing, by taking due consideration of known or anticipated factors that might affect it. For example, the change sponsor must identify and take account of any planned housing developments which have been given consent or known housing provision allocated within local development frameworks. These additional housing provisions must be factored into the baseline as they increase households and population affected by the change. Inclusion of planned housing development must be agreed with relevant stakeholders including local authorities.
- 3.14 Change sponsors must not assume that an airspace change has already taken place as part of the future baseline scenario, since this would have required an airspace change decision and associated assessment.

The change sponsor **must** develop a list of design options that address the statement of need and align with the criteria from the design principles

- 3.15 In Stage 2 the change sponsor must develop a list of design options that address the statement of need. The design principles developed during Stage 1 are used as a framework against which each design option can be evaluated. The design principles can have a local context and it is normal for there to be design options that do not align with every design principle. The change sponsor must consider the criteria from the design principles that will be used to inform the development of their design options, including which criteria may be prioritised over others and the supporting justification for this.
- 3.16 At this stage of the process, the change sponsor can present ‘conceptual’ or ‘detailed’ design options. Conceptual design options can be useful for large and complex projects, especially those that share interdependencies with other projects, where it is necessary to evaluate different conceptual solutions. The presentation of conceptual design options should provide enough detail for the concepts to be evaluated qualitatively through the design principle evaluation and initial options appraisal, and those showing potential can be refined and quantified further in Stage 3. Detailed design options would be more suitable where there is limited scope for multiple design options, with few realistic design options available. This could, for example, be because of international standards or the physical constraints of adjacent airspace or flight procedures. Where this is the case, change sponsors must explain to stakeholders and the CAA why, with appropriate evidence.
- 3.17 Where appropriate, change sponsors may want to consider the inclusion of radical design options. Radical design options demonstrate transparency by showing that a wide range of options, even extreme options, have been considered in the development of design options.
- 3.18 The change sponsor must describe the design options at two future points in time:
- year of implementation with the airspace change proposal (year 1)
 - 10-years after implementation with the airspace change proposal (year 10).
- 3.19 In some cases, the proposed airspace change will facilitate additional growth that otherwise could not be accommodated above business as usual growth/changes. Thus, the change sponsor must take account of any additional growth facilitated by the airspace change as well as the business as usual growth/changes in its environmental assessment and options appraisal.
- 3.20 In the following stages of the airspace change process, both of these scenarios must be assessed against baseline scenarios with no airspace change in the same two years such that the assessment comparisons are:

- year of implementation with the proposed airspace change versus the same year without the proposed airspace change (year 1)
- 10-years after implementation with the proposed airspace change versus the same year without the proposed airspace change (year 10).

- 3.21 As already stated, where the airspace change proposal is specifically intended to enable growth that could not occur without the change, for example due to airspace capacity constraints, the change sponsor must quantify this enabled growth in defining the above scenarios and take account of it in its environmental assessment and options appraisals.
- 3.22 The change sponsor must therefore provide traffic forecasts for year 1 and year 10. The change sponsor may provide traffic forecasts for the intermediate years within this 10-year period as supporting evidence.
- 3.23 The change sponsor must bear in mind that any design option that is eventually carried forward for approval at Stage 5 must be compliant with the relevant legal requirements and where applicable, government policy. It is important for change sponsors to ensure that they formulate their airspace change proposals cognisant of this legal and policy framework. Failure to do so may mean that the CAA is unable to approve their proposal. More detailed guidance on the CAA's statutory duties when making airspace change decisions can be found in Chapter 7 (Stage 5 – DECIDE).
- 3.24 It is vital that the change sponsor identifies any critical interdependencies with neighbouring air navigation service providers (operational, technical or training) and establishes plans to resolve any issues that arise. The change sponsor may wish to evaluate particular design options by undertaking simulations or by a live flight trial, where there is technical innovation or a design technique that can only be evaluated as such. Flight trials are subject to a separate airspace trials process. It should be noted that any evaluation at this stage is not considered as formal validation of the instrument flight procedure design, which takes place later in the airspace change process.
- 3.25 Design options that include instrument flight procedures must be compliant with the requirements set out in [CAP 785A, Oversight of UK Approved Procedure Design Organisations](#) and [CAP 785B, Implementation and Safeguarding of IFPs in the UK](#).

The change sponsor **must** provide evidence and supporting rationale to justify where single or limited design options are presented

- 3.26 It is recognised that, in certain situations, the scope of design options available could be very limited. In this case, a single design option is acceptable but must be presented with supporting justification.

Stakeholder Engagement

The change sponsor **must** share the baseline scenarios and design options with the same stakeholders as in Stage 1, so that they can comment accordingly (**should** for Level 2)

- 3.27 During the development of the design options, the change sponsor must engage with the same stakeholders as in Stage 1. There may also be occasions where additional stakeholders identify themselves and approach the change sponsor directly, or where the change sponsor identifies additional stakeholders as it develops its baseline scenarios, for example where it has identified a planned housing development that may be impacted. The change sponsor should consider whether to engage with those stakeholders during Stage 2. If any stakeholders are added to, or removed from, the list of stakeholders that were engaged at Stage 1 the change sponsor must provide a rationale for any such changes.

The change sponsor **must** explain the engagement approach/methodology used and the rationale for doing so

- 3.28 Transparency is a fundamental principle of the airspace change process. The purpose of engaging with stakeholders at Stage 2 is for the change sponsor to seek feedback on its design options, so that stakeholder concerns are properly understood and can be taken into account in the design principle evaluation. The change sponsor should consider the unique requirements of its stakeholders before developing its methodology (approach, materials) to facilitate meaningful engagement. Bilateral meetings and smaller challenge groups may be sufficient to ensure that stakeholder concerns have been properly understood and accounted for at this stage of the airspace change process.

The change sponsor **must** provide relevant engagement evidence

- 3.29 We would therefore expect to receive the following output from this activity:
- a list of those stakeholders engaged and a rationale for any changes since Stage 1
 - an explanation of the engagement methodology (approach, materials)
 - a chronology of the engagement activity
 - an explanation of the feedback received during the engagement process and the change sponsor's response to it (for example, in a summary table)

- materials distributed by the change sponsor, meeting/workshop presentations and minutes (where applicable), and copies of related correspondence between the change sponsor and stakeholders where points of feedback have been raised and responded to.

The change sponsor **must** demonstrate what they have heard and how this feedback has, or has not, informed the development of the baseline scenarios and design options

- 3.30 At the 'develop and assess' gateway, we must see what change sponsors have been told by their stakeholders, how they responded to this feedback and how it has influenced the baseline scenarios and design options. The change sponsor must demonstrate and provide evidence that it has captured, and taken into account, the views of stakeholders and set out how decisions it has taken relate to stakeholder feedback. If feedback has been rejected, there must be an explanation why.

Design Principle Evaluation

The change sponsor **must** describe the methodology used for the design principle evaluation

- 3.31 The change sponsor must produce a design principle evaluation that evaluates the design options against the design principles by specifying whether they have been met, partially met or not met.
- 3.32 When completing the design principle evaluation, the change sponsor must describe the methodology for evaluation to help demonstrate consistency and fairness. This should include an assessment matrix giving the criteria for met/partially met/not met, for each design principle.
- 3.33 The design principle evaluation helps the change sponsor identify the design options that meet certain factors, including safety, environment and economic, which can be progressed to the initial options appraisal, or to identify design options which do not meet certain factors and can be discontinued.
- 3.34 The change sponsor must explain the rationale to progress or discontinue design options and apply this approach consistently across each of the design options.

The change sponsor **must** evaluate how their baseline scenarios and design options have responded to the design principles, specifying if they have met, partially met or not met each design principle

- 3.35 When evaluating whether the baseline scenarios and design options have met design principles, the change sponsor must aim for the following:

- a fair and consistent application of its methodology: The criteria for each design principle to be met/partially met/not met by an option must be fairly and consistently applied with an explanation regarding its outcome for each option
- a demonstration of how feedback has influenced evaluation: where feedback has influenced the assessment, this should be reflected in the design principle evaluation. If for example, a stakeholder mentions a local context or circumstance that makes an option no longer viable, it should be explained
- an explanation why an option has progressed or been discontinued: If a change sponsor decides to take an option forward, they should explain why and apply this adopted criteria consistently. Equally, if a change sponsor has discontinued an option, they should explain why and apply this exclusion criteria consistently. In particular, where certain criteria from the design principles have been prioritised over others in discontinuing options, the change sponsor must explain why.

3.36 A report must be produced for the baseline scenarios and each design option which provides a description of the option and a qualitative assessment which summarises how it has met, partially met, or not met each of the design principles. For each option, the report must also confirm whether it has been accepted or rejected. To ensure that a standardised format is applied to the design principle evaluation process, change sponsors must use the following proforma:

Figure 3 Design principle evaluation proforma

Design principle evaluation		OPTION NO:	
<i>Option Name</i>		ACCEPT / REJECT	
<i>Description of option</i>			
Design principle:	NOT MET	PARTIAL	MET
<i>Summary of qualitative assessment</i>			
<i>[Repeat for each design principle]</i>			

The change sponsor **must** publish the design principle evaluation on the airspace change portal

3.37 The design principle evaluation will be of interest to stakeholders and therefore the change sponsor must publish the design principle evaluation using the standard CAA proforma on the airspace change portal. Stakeholders should be able to see how their feedback on the design options has been considered by the change sponsor. While there is no requirement for change sponsors to seek

feedback on the design principle evaluation, they will need to consider whether the design principle evaluation should be updated to ensure that it adequately reflects the views of stakeholders specifically with regards to the design options.

Options Appraisal

- 3.38 Options appraisal is an iterative process that is developed as the change sponsor refines its proposals in response to engagement and consultation, with the CAA reviewing the appraisal at each phase. The three phases of the options appraisals are:
- ‘initial’ appraisal (at Stage 2)
 - ‘full’ appraisal (at Stage 3)
 - ‘final’ appraisal (at Stage 4).
- 3.39 The options appraisals build the evidence base as the proposal matures, and so the final options appraisal evolves from the initial and full appraisals, including updates to the design that have been applied post consultation at Stage 4. This iterative process ensures that the detail of the design options matures in line with the proposal, and that a reasonable evidence base is made available to all stakeholders early on and increasingly throughout the process.
- 3.40 The options appraisals deliver clear and comparable evidence about a range of factors, so that, for a given proposal, different airspace design options can be compared and assessed on a similar basis. Change sponsors are required to use the list of metrics as given below in their options appraisals, through which the potential costs/benefits that may arise within the context of an airspace change can be assessed. However, this list is by no means exhaustive and change sponsors should endeavour to understand all of the potential costs and benefits that may be relevant for their specific change proposal.

Group: Communities, Impact: Noise

Level of analysis for initial options appraisal: Qualitative and where possible, quantified and monetised, depending on the level of the proposal and scalability rationale and evidence provided.

Level of analysis for full options appraisal: Quantified and monetised, depending on the level of the proposal.

Level of analysis for final options appraisal: Quantified and monetised, depending on the level of the proposal.

Description: Noise exposure contours above 51 dB $L_{Aeq,16h}$ daytime and 45 dB $L_{Aeq,8h}$ night-time and evaluated by Department for Transport’s transport analysis guidance (TAG) for impacts on health and quality of life. The costs and benefits derived from this analysis must be imported into the options appraisal.
Number above contours: N65 for daytime and N60 for night-time noise.

Overflight contours.
Operational diagrams.
Other noise metrics if relevant.

Group: Communities, Impact: Local air quality

Level of analysis for initial options appraisal: Qualitative and where possible, quantified and monetised, depending on the level of the proposal and scalability rationale and evidence provided.

Level of analysis for full options appraisal: Quantified and monetised, depending on the level and scoping criteria of the proposal.

Level of analysis for final options appraisal: Quantified and monetised, depending on the level and scoping criteria of the proposal.

Description: Explicit consideration of, and evaluated by Department for Transport's transport analysis guidance (TAG) where necessary. The costs and benefits derived from this analysis must be imported into the options appraisal.

Group: Wider society, Impact: Greenhouse gas emissions

Level of analysis for initial options appraisal: Qualitative and where possible, quantified and monetised, depending on the level of the proposal and scalability rationale and evidence provided.

Level of analysis for full options appraisal: Quantified and monetised, depending on the level of the proposal.

Level of analysis for final options appraisal: Quantified and monetised, depending on the level of the proposal.

Description: Annual CO_{2e} totals and evaluated by Department for Transport's transport analysis guidance (TAG). The costs and benefits derived from this analysis must be imported into the options appraisal.

Group: Wider society, Impact: Tranquillity

Level of analysis for initial options appraisal: Qualitative and where possible, quantified, depending on the level of the proposal and scalability rationale and evidence provided.

Level of analysis for full options appraisal: Qualitative and where possible, quantified, depending on the level of the proposal.

Level of analysis for final options appraisal: Qualitative and where possible, quantified, depending on the level of the proposal.

Description: Explicit consideration of impacts on locally identified tranquillity areas, and assessment using operational diagrams or overflight contours.

Group: Wider society, Impact: Biodiversity

Level of analysis for initial options appraisal: Qualitative and where possible, quantified, depending on the level of the proposal and scalability rationale and evidence provided.

Level of analysis for full options appraisal: Qualitative and where possible, quantified, depending on the level of the proposal.

Level of analysis for final options appraisal: Qualitative and where possible, quantified, depending on the level of the proposal.

Description: Explicit consideration of impacts on locally identified biodiversity areas, and assessment using operational diagrams or overflight contours.

Group: Wider society, Impact: Capacity/resilience

Level of analysis for initial options appraisal: Qualitative and where possible, quantified and monetised.

Level of analysis for full options appraisal: Quantified and monetised, depending on the level of the proposal.

Level of analysis for final options appraisal: Quantified and monetised, depending on the level of the proposal.

Description: Change sponsors should qualitatively assess the effect of the proposal on the overall UK infrastructure. Dependent upon the scope of the proposed change, the CAA may require quantitative methodologies that allows monetisation of the impact, including impact on air passengers' time.

Group: General aviation, Impact: Access

Level of analysis for initial options appraisal: Qualitative and where possible, quantified and monetised.

Level of analysis for full options appraisal: Quantified and monetised, depending on the level of the proposal.

Level of analysis for final options appraisal: Quantified and monetised, depending on the level of the proposal.

Description: Change sponsors should qualitatively assess the effect of the proposal on the overall UK infrastructure. Dependent upon the scope of the proposed change the CAA may require quantitative methodologies that allows monetisation of the impact.

Group: General aviation/commercial airlines, Impact: Economic impact from increased effective capacity

Level of analysis for initial options appraisal: Qualitative and where possible, quantified.

Level of analysis for full options appraisal: Quantified, depending on the level of the proposal.

Level of analysis for final options appraisal: Quantified, depending on the level of the proposal.

Description: Forecast change in air transport movements and estimated passenger numbers or cargo tonnage carried.

Group: General aviation/commercial airlines, Impact: Fuel burn

Level of analysis for initial options appraisal: Qualitative and where possible, quantified and monetised.

Level of analysis for full options appraisal: Quantified and monetised, depending on the level of the proposal.

Level of analysis for final options appraisal: Quantified and monetised, depending on the level of the proposal.

Description: Fuel costs and the relative efficiency of aircraft are readily obtainable from market data. Change sponsors must quantify and monetise these costs based on its assumptions of the fleets in operation.

Group: Commercial airlines, Impact: Training costs

Level of analysis: Level of analysis for initial options appraisal: Qualitative and where possible, quantified and monetised.

Level of analysis for full options appraisal: Quantified and monetised, depending on the level of the proposal.

Level of analysis for final options appraisal: Quantified and monetised, depending on the level of the proposal.

Description: Where a proposal would lead to a need for retraining, this should be quantified and monetised.

Group: Commercial airlines, Impact: Other costs

Level of analysis for initial options appraisal: Qualitative and where possible, quantified.

Level of analysis for full options appraisal: Qualitative and where possible, quantified.

Level of analysis for final options appraisal: Qualitative and where possible, quantified.

Description: Where there are likely to be other costs imposed on commercial aviation, these should be described. Where these costs are quantifiable, an assessment should be made.

Group: Airport/air navigation service provider, Impact: Infrastructure costs

Level of analysis for initial options appraisal: Qualitative and where possible, quantified and monetised.

Level of analysis for full options appraisal: Quantified and monetised, depending on the level of the proposal.

Level of analysis for final options appraisal: Quantified and monetised, depending on the level of the proposal.

Description: Where the proposal requires a change in the infrastructure, this should be monetised.

Group: Airport/air navigation service provider, Impact: Operational costs

Level of analysis for initial options appraisal: Qualitative and where possible, quantified and monetised.

Level of analysis for full options appraisal: Quantified and monetised, depending on the level of the proposal.

Level of analysis for final options appraisal: Quantified and monetised, depending on the level of the proposal.

Description: Where a proposal will lead to changes in operational costs, these should be monetised.

Group: Airport/air navigation service provider, Impact: Deployment costs

Level of analysis for initial options appraisal: Qualitative and where possible, quantified and monetised.

Level of analysis for full options appraisal: Quantified and monetised, depending on the level of the proposal.

Level of analysis for final options appraisal: Quantified and monetised, depending on the level of the proposal.

Description: Where a proposal would lead to a need for retraining and other deployment costs, this should be quantified and monetised.

Group: Airport/air navigation service provider, Impact: Other costs

Level of analysis for initial options appraisal: Qualitative and where possible, quantified and monetised.

Level of analysis for full options appraisal: Qualitative and where possible, quantified and monetised, depending on the level of the proposal.

Level of analysis for final options appraisal: Qualitative and where possible, quantified and monetised, depending on the level of the proposal.

Description: Where there are likely to be other costs imposed on airports/air navigation service provider, these should be described. Where these costs are quantifiable, an assessment should be made.

Change sponsors should also be mindful of the Government's guidance on compensation scheme for increased noise exposure as a result of changes (to both airspace and infrastructure). When assessing the impacts of different options, the minimum expectation for financial assistance towards acoustic insulation where residents are newly exposed to noise at the 63 dB $L_{Aeq,16h}$ level or above, and compensation to be considered where they experience significantly increased overflight, should be factored into assessments, as this may influence which option change sponsors choose to develop.

- 3.41 It may not be proportionate to quantify some costs and benefits. The frameworks set out in this guidance, the Green Book and the Department for Transport's transport analysis guidance (TAG) are designed to be applied flexibly to match the circumstances of the proposal. We consider that, as a rule of thumb, more detailed analysis should be provided where the proposal is likely to affect more stakeholders and/or affect more than one airport. We will be able to provide more guidance when the change sponsor is carrying out the initial appraisal. We expect the change sponsor to set out why it has not undertaken specific quantified and monetised analysis as part of its assessment. The CAA may ask the change sponsor to carry out quantified and monetised analysis if we decide that its rationale is not sufficiently compelling. In the absence of quantified and monetised analysis, change sponsors must make a qualitative assessment of the specific cost or benefit.
- 3.42 Change sponsors should discuss their methodology with the CAA when quantifying and monetising impacts in the groups 'Commercial airlines' and 'Airport/air navigation service provider'.

Valuing Costs and Benefits

- 3.43 The change sponsor will need to value all relevant costs and benefits of the design options. Net present value (NPV) and benefit cost ratio (BCR) are commonly used measures to summarise the cost benefit analysis (CBA). The net costs or benefits can then be calculated and compared across varying design options. If necessary, change sponsors may use ranges rather than precise figures.
- 3.44 Market prices provide the best estimate of the cost or benefit (for example, the cost of jet fuel can be observed on petroleum markets). However, a number of the costs or benefits in an options appraisal will be wider social and environmental costs, for which there may not be market prices. In such cases, the change sponsor should look for another means to quantify them. A key source of values of costs and benefits is published studies, but there may be a

need to carry out specific analysis or at least to understand the approach taken in studies used to ensure that they are robust and reliable.

- 3.45 When appraising costs and benefits of an airspace change option, a change sponsor should assess them incrementally against the baseline scenarios. In other words, a change sponsor should assess the additional benefit or cost of the option, not the absolute (total) benefit or cost.
- 3.46 The values derived for the costs and benefits set out above must be expressed in ‘real’ rather than ‘nominal’ terms. When we state ‘real’ terms we mean prices for which the effect of inflation has been stripped out.
- 3.47 Values will then be reported in the ‘base’ year for the assessment. The ‘base’ year for the assessment is the year in which the general price level has been chosen. Change sponsors should follow TAG guidance when selecting a base year.
- 3.48 As well as taking account of inflation in real prices, the change sponsor needs to be aware of people’s time preference and discount the values appropriately. Therefore, for the purposes of the airspace change process it is appropriate to use a social time preference rate.
- 3.49 Further discussion can be found in Chapter 5 of the Green Book and TAG A1.1.

Conduct the Initial Options Appraisal

The change sponsor **must** consider the initial options appraisal against the statutory factors and where applicable, government policy that the CAA is required to consider

- 3.50 Change sponsors must conduct an initial options appraisal of each of the design options using the metrics and level of analysis as detailed above (see pages 45 to 49). These metrics have been designed to address the statutory factors and where applicable, government policy that the CAA is required to consider in deciding whether to approve an airspace change proposal. More detailed guidance on the CAA’s statutory duties when making airspace change decisions can be found in Chapter 7 (Stage 5 – DECIDE).
- 3.51 Safety work is also received as part of the options appraisal process but is not included in the list metrics listed above (see pages 45-49); more information as to how the CAA reviews safety appears at the end of this guidance document.
- 3.52 An initial indication of safety implications will need to be included in the initial options appraisal. We expect the initial indication to include qualitative statements on the potential impacts each design option could have on maintaining a high standard of safety. For example, it might be that reducing the complexity of airspace is anticipated to reduce the number of controller

interactions which could reduce risk and impact positively on safety. We do not expect those qualitative statements to compare the safety of one design option against another. If there is more than one design option, the CAA will not conduct a review of the safety implications carried out by the change sponsor at this stage.

- 3.53 If there is only one design option put forward at this stage on the basis that it is the only safe design option to mitigate the risk(s) considered, the CAA will review the safety implications to determine whether we agree that is the only potential design option, on the grounds of safety. If we agree, the initial options appraisal may go forward with only one design option. If we disagree, the change sponsor may not pass the gateway. The CAA will publish this determination on the online portal at this point.

Metrics to be used in the Initial Options Appraisal

The change sponsor **must** ensure that the initial options appraisal is objective (unbiased and evidence based), repeatable and consistent

- 3.54 The initial options appraisal provides evidence for the change sponsor's shortlisting of options. To minimise the risk of a change sponsor being accused of skewing evidence and detail towards its favoured design option, options need to be appraised in a consistent way in each phase. This appraisal therefore needs to be objective (unbiased), repeatable and consistent against defined criteria.
- 3.55 The change sponsor should identify criteria for the initial options appraisal and apply these to narrow down the design options to a selected shortlist. The criteria should not be made overly restrictive, as to do so may remove a potentially suitable design option at too early a stage but should still set out clearly why options have been discontinued.
- 3.56 The CAA acknowledges that airspace change decisions cannot be reduced to an entirely numerical exercise. Numerical values are not a substitute for policy direction on which outcomes are important in the design of airspace. However, a systematic process that includes quantification of the costs and benefits of a particular airspace change proposal helps to provide consistency in options appraisal for all concerned. It also provides additional data helping the CAA to make the best possible decision against a background of increasing scarcity of airspace capacity.
- 3.57 The methodologies and tools for the options appraisal have been developed in accordance with government policy, such as the Government's Air Navigation Guidance 2017.

The change sponsor **must** undertake a qualitative and where possible, a quantitative assessment according to the scale of the design options and the nature of the potential impacts

- 3.58 The initial options appraisal should, as a minimum, contain qualitative assessments of the different options. This highlights the relative differences between the impacts, both positive and negative, of each option to change sponsors, stakeholders and the CAA.
- 3.59 The options appraisals (along with any environmental assessments undertaken as part of those appraisals) are to be included in the change sponsor's subsequent consultation material.

The change sponsor **must** conduct an initial options appraisal of the potential impacts of each design option against the baseline scenarios

- 3.60 The change sponsor assesses each option against the baseline scenarios, even where there is only a single change option, to understand the impacts. The assessment comparisons are:
- year of implementation with the proposed airspace change versus the same year without the proposed airspace change (year 1)
 - 10-years after implementation with the proposed airspace change versus the same year without the proposed airspace change (year 10).
- 3.61 As a minimum, the initial options appraisal of each design option must include:
- a qualitative assessment of the likely environmental impacts, including all direct and consequential impacts. Please refer to [CAP 1616i, Environmental Assessment Requirements and Guidance for Airspace Change Proposals](#) for further requirements, guidance on performing and scaling environmental assessments (where applicable)
 - a high-level assessment of all reasonable costs and benefits involved
 - a qualitative assessment of the potential impacts on safety.
- 3.62 The list above forms the minimum requirement. The change sponsor is encouraged to develop its initial options appraisal using as much analysis as reasonably possible, prior to submitting the appraisal to the CAA.

The change sponsor **must** provide an indication of the preferred design option(s)

- 3.63 As part of the shortlisting process, change sponsors must provide an indication of the preferred design option, or set of preferred design options.

The change sponsor **must** provide supporting evidence for the category used in relation to CAP 2091, CAA Policy on Minimum Standards for Noise Modelling applicable to the airspace change proposal

- 3.64 The change sponsor must justify to the CAA which CAP 2091 Category its noise modelling methodology currently falls into and the highest Category it would fall into over the 10-year forecast period which would therefore apply to the airspace change proposal. The justification must be accompanied by appropriate supporting evidence. Where noise modelling is not required, the change sponsor will not need to undertake the analysis of its CAP 2091 Category.

The change sponsor **must** use the most up-to-date, credible, and clearly referenced sources of data to assess the impacts of the baseline scenarios and design options

- 3.65 The change sponsor must use the most up-to-date and credible, clearly referenced sources of data, with modelling carried out in line with relevant best practice while developing the initial options appraisal. The change sponsor must explain the methodology it adopted in order to reach its input and analysis results. It must also provide the referenced sources of data that support its analysis outcome. Please refer to [CAP 1616i, Environmental Assessment Requirements and Guidance for Airspace Change Proposals](#) for further requirements, guidance on performing and scaling environmental assessments (where applicable).

The change sponsor **must** identify any evidence gaps in the initial options appraisal and describe what evidence will be collected, and how, to fill such gaps and develop the full options appraisal

- 3.66 The change sponsor must identify where there are significant evidence gaps in the initial options appraisal, for example, due to uncertainties in the assumptions made in the evaluation methodologies or gaps in the data used for the appraisal.
- 3.67 The change sponsor must then describe how it plans to fill these evidence gaps including:
- what key data needs to be collected
 - where this data may be captured (for example, any referenced sources for such data)
 - how this data will be gathered (for example, through further research, monitoring, surveys, etc.)
 - how this data will be used to develop the full options appraisal (for example, in accordance with compliant modelling methodologies or appraisal practices).

Habitats Regulations Assessment

The change sponsor **must** conduct the habitats regulations assessment screening exercise

- 3.68 A habitats regulations assessment is required for airspace change proposals which are likely to have a significant effect - either alone or in combination with other plans or projects - on European sites. Please refer to [CAP 1616i, Environmental Assessment Requirements and Guidance for Airspace Change Proposals](#) for more information on habitats regulations assessment.
- 3.69 In order to ascertain the potential for this to occur, and whether an appropriate assessment of the potential adverse effects of the airspace change proposal on European sites is needed, the change sponsor must undertake a screening exercise. The CAA has developed early screening criteria for change sponsors to use. The change sponsor must complete the habitats regulations assessment early screening criteria form as given in [CAP 1616i, Environmental Assessment Requirements and Guidance for Airspace Change Proposals](#).

Stage 2 (Develop and Assess) Gateway

The change sponsor **must** submit the required outputs to the CAA for assessment at the ‘develop and assess’ gateway and publish them on the airspace change portal

- 3.70 The ‘develop and assess’ gateway occurs at the end of Stage 2. At this point, we will complete our regulatory assessment of the change sponsor’s outputs and relevant supporting evidence to determine whether the airspace change process requirements have been followed. There is no requirement for Level 3 airspace change proposals to pass a Stage 2 ‘develop and assess’ gateway, rather after completing Stage 2 Level 3 requirements, the change sponsor can proceed directly to the Stage 3 Level 3 requirements.

Outputs Required During Stage 2

Before ‘develop and assess’ gateway (produced and published by the change sponsor)

‘Develop and assess’ gateway submission, including:

- the baseline scenarios and design options
- design principle evaluation
- initial options appraisal, including safety assessment
- environmental assessment
- applicable CAP 2091 category

- habitats regulations assessment early screening criteria form
- relevant engagement evidence
- completed submission checklist.

After ‘develop and assess’ gateway (produced and published by the CAA)

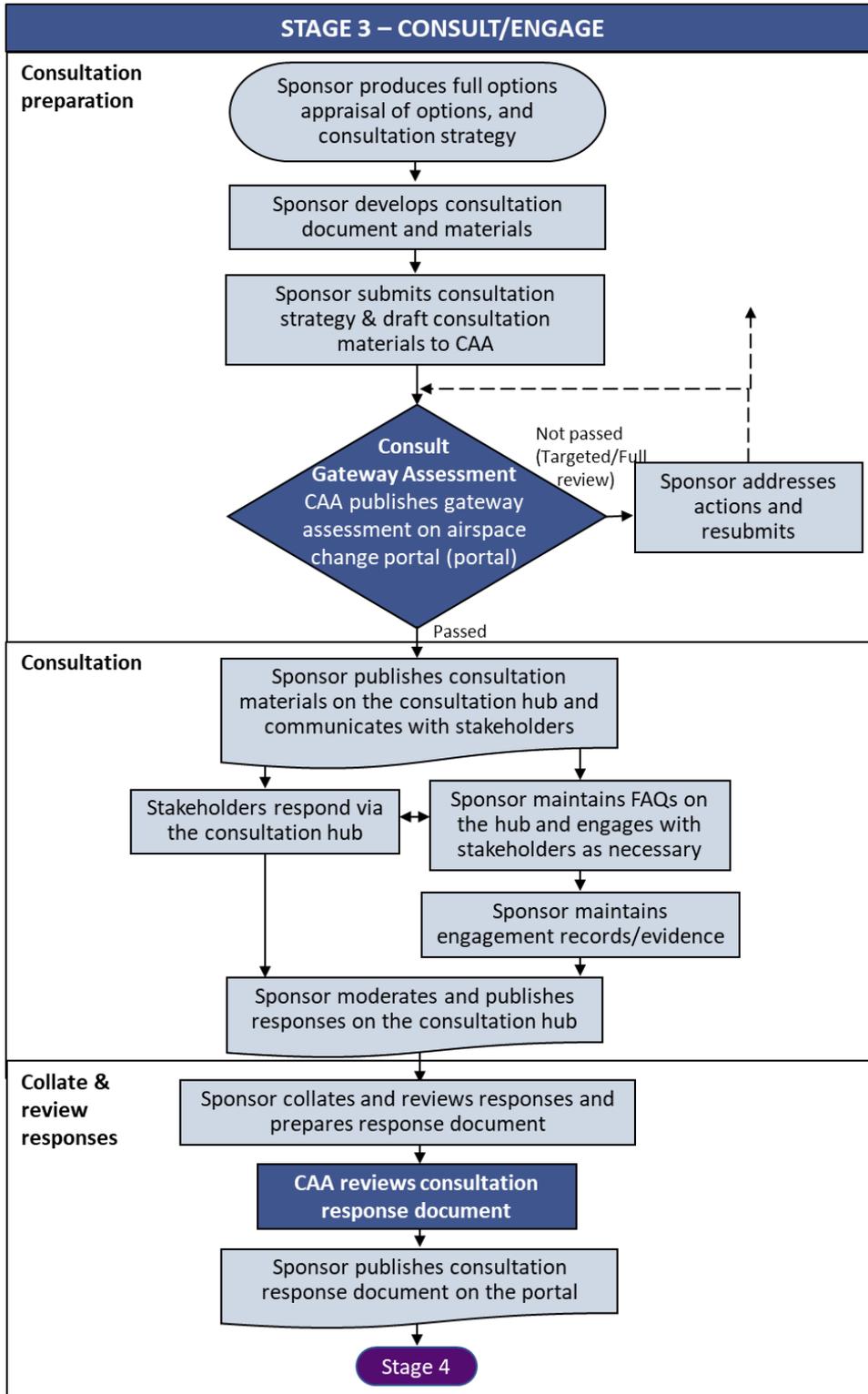
- ‘develop and assess gateway’ outcome and confirmation of level
- CAA assessment of change sponsor’s initial options appraisal.

Chapter 4

Stage 3 – CONSULT/ENGAGE

Process Overview

Figure 4 Stage 3 (consult/engage) process overview



Introduction

- 4.1 Having passed the ‘develop and assess’ gateway, the change sponsor moves on to the ‘consult/engage’ stage.
- 4.2 This is where the change sponsor provides a more quantitative assessment of the design options in the full options appraisal, before gathering information in order to understand stakeholders’ views about the impact of its airspace change proposal. Whether this requires a full consultation or a scaled form of consultation - engagement - will depend on the scale and impacts of the airspace change proposal. To be effective, those who are consulted by change sponsors should be able to base their views on a reasonable understanding of the situation and clear information about what is proposed and the potential impacts on them. Stakeholders must be able to express their views and have confidence that their feedback will inform the final airspace change proposal.
- 4.3 The change sponsor prepares a strategy and draft materials and submits them, along with the full options appraisal, to the CAA for assessment at the ‘consult/engage’ gateway. This gives the CAA the opportunity to consider the change sponsor’s approach to its local context and circumstances and determine whether it meets regulatory requirements prior to the consultation or engagement beginning. Having passed the ‘consult/engage’ gateway, the change sponsor implements its strategy and launches its consultation/engagement activities. It will then collate, review and categorise the feedback, producing a consultation response document adopting a ‘we asked, you said, we did’ approach.
- 4.4 Stage 3 is completed with the publication of the change sponsor’s consultation response document on the airspace change portal.
- 4.5 After the change sponsor has modified its proposal at Stage 4, there may be a requirement for additional consultation if the impact of the final design option has fundamentally changed, or if there is a fundamental difference between the proposal consulted on and the final design option. More information related to this is provided in Stage 4. If re-consultation is necessary, the change sponsor moves back to the start of Stage 3; however, a proportionate approach should be adopted that considers the nature of the changes to the final design option following the previous consultation. This should be discussed with the CAA prior to committing to a course of action.

Scaling of Stage 3

- 4.6 The extent of the qualitative and quantitative analysis undertaken in the full options appraisal should be proportionate to the scale and impacts of the airspace change proposal. The change sponsor must fully explain why any deviation from the CAA’s requirements is justified on proportionality grounds. We may, at our discretion, accept the change sponsor’s rationale, or may require

further analysis. For airspace change proposals where there is a single design option only (other than the baseline scenarios), initial options appraisal and full options appraisal requirements can be consolidated.

- 4.7 Please refer to [CAP 1616i, Environmental Assessment Requirements and Guidance for Airspace Change Proposals](#) for further requirements, guidance on performing and scaling environmental assessments (where applicable).
- 4.8 The extent of consultation required will depend on local circumstances, the scale and impacts of the airspace change proposal and will have already been discussed at the assessment meeting with the CAA in Stage 1.
- 4.9 For Level 1 and Level 2 airspace change proposals, consultation is usually the minimum expectation for Stage 3. At this stage in the airspace change process, it will not usually be appropriate to adopt a scaled form of consultation - engagement.
- 4.10 For Level 3 changes either consultation or engagement may be appropriate, depending on the scale and impacts of the airspace change proposal. Further guidance on how Stage 3 can be scaled for Level 3 airspace change proposals can be found in [CAP 1616h, Guidance on Airspace Change Process for Level 3 and Pre-Scaled Airspace Change Proposals](#).
- 4.11 Where there are requirements in this section, they are the minimum necessary which the change sponsor can build upon if appropriate for the specific unique circumstances of its airspace change proposal. A change sponsor should consider best-practice examples set out in this document and elsewhere when developing its approach to consultation or engagement at Stage 3.

Conduct the Full Options Appraisal

The change sponsor **must** develop the initial options appraisal into a full options appraisal

- 4.12 As explained in Stage 2, the options appraisal evolves through three phased iterations, with the CAA reviewing the information in the options appraisal at each phase. The second 'full' phase to be completed in Stage 3 requires the change sponsor to develop more rigorous evidence for the design option(s) which it intends to consult/engage on.
- 4.13 The change sponsor may undertake further work as part of the design process to rationalise and refine their design options before completing the full options appraisal. This further work may be especially necessary for complex airspace change proposals, or where there are a significant number of design options remaining after the initial options appraisal. As a result of this work, the change sponsor may decide not to progress some of the design options that were initially shortlisted at the end of Stage 2 on to the full options appraisal. The change

sponsor must provide a robust rationale supported with appropriate evidence, justifying why certain design options were not progressed to the full options appraisal. This rationale plus the supporting evidence must be clearly explained in any consultation/engagement materials and in the final airspace change proposal submitted to the CAA.

- 4.14 For the full options appraisal, the initial options appraisal must be developed into a detailed quantified and monetised assessment. Change sponsors must conduct a full options appraisal of each of the design options which it intends to consult/engage on using the metrics and level of analysis as detailed in Chapter 4. The full options appraisal must include:
- each shortlisted design option fully developed, including a comparison of its impacts against the baseline scenarios, in particular:
 - all evidence gaps identified at Stage 2 fully assessed
 - all reasonable costs and benefits quantified
 - all other costs and benefits described qualitatively
 - reasons why costs and benefits have not been quantified
 - detail on the preferred design option, setting out reasons for the preference (where relevant)
 - a more detailed assessment of the impacts on safety, if completed by the change sponsor
 - a quantified and monetised environmental assessment, including all direct and consequential impacts. Please refer to [CAP 1616i, Environmental Assessment Requirements and Guidance for Airspace Change Proposals](#) for further requirements, guidance on performing and scaling environmental assessments (where applicable).
- 4.15 A more detailed safety assessment will not need to be included in the full options appraisal, unless the change sponsor has undertaken that work. If only one design option remains at this stage on the basis that it is the only safe design option, the CAA will review the safety implications to determine whether we agree that is the only potential design option, on the grounds of safety. If we agree the full options appraisal may go forward within only one design option. If we disagree, the change sponsor may not pass the gateway and may have to revisit the full options appraisal or provide the CAA with additional information. The CAA will publish this determination on the airspace change portal.

The change sponsor **must** use the most up-to-date, credible, and clearly referenced sources of data to assess the impacts of the baseline scenarios and design options

- 4.16 The change sponsor must use the most up-to-date and credible, clearly referenced sources of data, with modelling carried out in line with relevant best practice while developing the full options appraisal. The change sponsor must explain the methodology it adopted in order to reach its input and analysis results. It must also provide the referenced sources of data that support its analysis outcome.
- 4.17 The change sponsor must be prepared to provide the CAA with all of its supporting data in a machine-readable format to enable the CAA to validate its analysis.

Habitats Regulations Assessment

The change sponsor **must** provide any additional assessments for the habitats regulations assessment as specified by the CAA.

- 4.18 The change sponsor must contact the CAA if they are unable to screen out the habitats regulations assessment at Stage 2. The CAA will then provide further guidance on the information it will require from the change sponsor with respect to the habitats regulations assessment. This may include a secondary screening assessment and, where likely significant effects on European sites cannot be ruled out, an appropriate assessment of the potential adverse effects on the integrity of those European sites.

Consultation

- 4.19 Consultation is a formal process seeking input into a decision, undertaken in line with the Gunning principles¹ and government guidance. If the overall airspace change process is to function correctly, it is crucial that a consultation is open, fair, transparent and effective. The fundamental principles of effective consultation are targeting the right audience, communicating in a way that suits them, and giving them the tools to make informative, valuable contributions to the airspace change proposal's development. The CAA reviews the change sponsor's consultation strategy and materials to consider whether they meet these aims.
- 4.20 To hold the change sponsor accountable both for the way it acts on the responses it receives and for providing timely feedback on those responses, the

¹ The Gunning principles set out legal expectations for what constitutes an appropriate consultation, and were established in a court case from 1985 (R v London Borough of Brent ex parte Gunning).

CAA also oversees the consultation process to ensure that change sponsors meet their obligations.

- 4.21 An unsatisfactory consultation, for example with consultation documents needing to be amended and re-issued, may increase the cost and timescales for the change sponsor, but also loses the confidence of those being consulted. The likely effectiveness of the consultation will be an important part of the CAA's approval that the consultation strategy meets the requirements of Stage 3 at the Stage 3 'consult/engage' gateway.
- 4.22 This consultation guidance was developed with consideration of [the Government's consultation principles](#), which change sponsors may wish to refer to alongside this document, applied to the unique circumstances surrounding an airspace change proposal.

The Gunning Principles

- 4.23 The Gunning principles set out legal expectations for what constitutes an appropriate consultation, and the CAA will assess whether the change sponsor has demonstrated compliance with them when reviewing the effectiveness of a consultation.
- 4.24 The four Gunning principles, and what each means for change sponsors, are set out below.

Consultation should occur when proposals are at a formative stage. A public consultation should only take place when there is still the opportunity to comment on what is proposed and influence the outcome. The change sponsor may have a preferred design option, but should explain which other options have been considered and its rationale for continuing with the design option (or options) it is consulting on. The change sponsor must also still be willing to take into account other options which may be proposed during the consultation. If decisions have already been made about certain aspects of a proposal, this must be clearly stated and explained so that stakeholders are able to understand why those aspects are not within the scope of the consultation.

The consultation should give sufficient reasons for any proposal to permit intelligent consideration. Stakeholders responding to a consultation should have access to sufficient information to understand and give intelligent consideration to the proposals when providing feedback. This means that any information presented during the consultation must clearly communicate what is proposed and allow people, including, where appropriate, those without any prior knowledge of the aviation industry or the airspace change process, to fully understand the airspace change proposal and the impacts it will have.

The consultation should allow adequate time for consideration and response. The accepted standard is that airspace change consultations should last for 12

weeks. The CAA may consider a reduced consultation period where a change sponsor provides a strong rationale.

The product of consultation must be conscientiously taken into account. The change sponsor must enter the consultation with an open mind and take all views into consideration before making a final decision and submitting its airspace change proposal to the CAA in Stage 4. As part of its submission, the change sponsor must explain what it has heard from stakeholders in the consultation and demonstrate how that has influenced the change sponsor's final airspace change proposal.

Consultation Preparation

- 4.25 When preparing for a consultation, change sponsors should be clear about what they are trying to achieve. Key elements of consultation preparation include understanding which audiences are likely to be impacted by the proposal and deciding which methods and tools are most appropriate for the change sponsor to reach and engage with the audiences it has identified.
- 4.26 It is also good practice to identify and assess the risks that could have a potential impact on the consultation process.

Consultation Strategy

The change sponsor **must** produce a consultation strategy

- 4.27 We appreciate the complexities associated with consulting with all potentially affected stakeholders including the number of people and audiences involved, overcoming past 'history' between change sponsors and some stakeholders, conflicting airspace priorities, and the technical nature of some airspace change proposals. Discussions with local representatives such as local authorities, airport consultative committees and local groups may assist the change sponsor in developing its consultation strategy.
- 4.28 Different audiences will have different requirements. The scale and nature of consultation required will also differ depending on the number and nature of affected stakeholders and the impacts upon them. The development of the initial options appraisal into a full options appraisal helps the change sponsor rationalise the design options to one (or to a shortlist), which will help inform the development of the consultation strategy.
- 4.29 The change sponsor's consultation strategy should set out how the change sponsor intends to facilitate an effective consultation, taking account of the guidance in this document. A template for change sponsors to use as a starting point in developing their consultation strategy can be found at Appendix B.

- 4.30 While the above refers to consultation, the same elements can also be applied to an engagement strategy.

The change sponsor *must* produce a consultation strategy that identifies which stakeholders are likely to be impacted, positively or negatively

- 4.31 The change sponsor will need to identify those stakeholders that are likely to be impacted by the airspace change proposal, building on the audiences identified in Stages 1 and 2. The consultation strategy should explain which stakeholders have been identified, and the methodology used to identify them.

- 4.32 Having identified all impacted stakeholders, the change sponsor may wish to analyse and group stakeholders so that consultation activities can be more effectively managed. Known as stakeholder mapping, this enables more specific communication and engagement approaches to be used with different stakeholder groups so that they are aware of the consultation and have the appropriate opportunities to engage and respond.

The change sponsor *must* produce a consultation strategy that explains what stakeholders' information needs are and, where appropriate, considers any seldom-heard audiences

- 4.33 Different audiences will have different requirements and the change sponsor should detail how it will provide the audiences it has identified with the information they need in order to provide an informed response to the consultation.
- 4.34 Particular consideration should be given to those who are not regularly in contact with the change sponsor, those who do not have existing knowledge of aviation, and seldom-heard audiences. 'Seldom-heard audiences' refers to under-represented people who are less likely to be heard and may have particular needs when it comes to participating. Particular ethnic minority groups, people with disabilities, older or younger people or people with language barriers are just a few examples of seldom-heard audiences.
- 4.35 Facilitation may be especially useful in achieving effective outputs from consultation events in the case of seldom-heard audiences, or for those not currently engaged with the aviation industry.
- 4.36 The change sponsor should also consider what requests it might receive for information in different formats (for example printed documents, different languages or accessible formats such as large print) and how it would make reasonable adjustments in response to them.

The change sponsor **must** produce a consultation strategy that details how the change sponsor will inform different audiences of the consultation and what opportunities those audiences will have to engage and respond

- 4.37 The consultation will be undertaken through the Citizen Space consultations hub, and all information must be available there. However, different audiences will have different requirements, and not all stakeholders will have internet access, so this will not suit all consultees. Based on the audiences it has identified, the change sponsor must set out how it will inform stakeholders of the consultation and how all audiences will be able to respond effectively.
- 4.38 The change sponsor will need to consider which methods, approaches and channels (both online and offline) are most appropriate for engaging different groups, and what other activities can ensure that all identified stakeholders are engaged with and included in the consultation. Depending on the scale and impacts of the proposal these could include, for example, social media, the change sponsor's website, webinars, videos, drop-in sessions, roadshows, focus groups, printed promotional material, advertising and media coverage.
- 4.39 For those airspace change proposals that will have a higher impact and require a wide range of communication activity, the change sponsor may wish to consider a separate communications plan that sets out the messages and channels the change sponsor will use to publicise the consultation, and when it will use them.

The change sponsor **must** produce a consultation strategy that considers whether it is appropriate to use intermediaries to communicate with impacted stakeholders, or whether the nature of the airspace change proposal means direct contact with impacted parties is more appropriate

- 4.40 Examples of intermediaries that could be used to communicate with impacted stakeholders include airport consultative committees, local authorities, and/or local and national representative organisations.

The change sponsor **must** produce a consultation strategy that considers whether individual properties need to be contacted, or that sets out other reasonable methods of reaching communities

- 4.41 Where stakeholders include specific communities, the change sponsor must consider which method is reasonable in order to reach them. Depending on the scale and impacts of the airspace change proposal, contacting individual properties may be necessary. If the change sponsor does not consider that is reasonable, it should provide a rationale for that decision and must set out what other reasonable methods it will use to reach communities (for example, through local media, social media, local authority communications or advertising).

The change sponsor **must** produce a consultation strategy that details the intended start and end dates of the consultation and provides a rationale detailing why the consultation length is sufficient to facilitate an effective consultation

4.42 The duration of the consultation must be proportionate to the scale and impacts of the airspace change proposal and take into account relevant government guidance or best practice. The accepted standard is that airspace change consultations should last for 12 weeks. Any major holidays should also be considered, allowing extra time where appropriate. We may consider a reduced consultation period where a change sponsor provides a strong rationale based on:

- the impacts of the change
- the audience map and impacted groups (especially seldom-heard audiences)
- factors outside the change sponsor's control, such as legal constraints
- technical or operational constraints.

The change sponsor **must** produce a consultation strategy that **should** include a timetable of associated consultation activities

4.43 Depending on the scale and impacts of the airspace change proposal, different activities or events can be used to help support a consultation, both online and offline, such as drop-in sessions, roadshows or webinars. The change sponsor should consider which channels are appropriate to provide opportunities for the audience it has identified (including those with no internet access) to engage with, and respond to, the consultation.

4.44 Where the change sponsor intends to include such activities as part of its consultation strategy, it should detail the planned activities and when and where they are intended to take place during the consultation period.

4.45 We recognise the complexities of planning large-scale consultations, so at this stage an indicative timeline of when such activities are to be carried out during the consultation period is sufficient if specific venues and dates have not yet been confirmed.

The change sponsor **must** produce a consultation strategy that explains what steps will be taken to generate an appropriate level of participation and respond to unexpected events and challenges

4.46 The consultation strategy must detail the steps that will be taken to encourage participation and generate an appropriate level of response. As well as initially informing stakeholders about the consultation, the change sponsor should

consider when to issue reminders, and through what channels, during the consultation period to encourage participation.

- 4.47 The change sponsor should consider what would constitute a successful consultation, and how it will review the consultation as it progresses to assess whether the methods and approach that have been adopted are delivering the right results.
- 4.48 Engagement exercises with large numbers of people are challenging to manage in practice. Change sponsors need to consider the actions that will be taken to minimise the chances of the consultation strategy failing and how they might respond to unexpected events and challenges during the consultation period (for example, what their contingency plans are). This could include, for example, extending the duration of the consultation or by escalating to the CAA where appropriate
- 4.49 The change sponsor should also consider how it will manage any responses received after the consultation period has closed.

The change sponsor **must** produce a consultation strategy that details how the consultation material will provide stakeholders with enough information to ensure that they understand the issues and the potential impacts of the airspace change proposal on them so they can give informed responses

- 4.50 Having identified who its audiences are and what information they need, the change sponsor should detail how it will provide stakeholders with enough information to understand what is proposed and give informed responses. This requirement relates directly to one of the Gunning principles detailed above, so failure to provide enough information could lead to an ineffective consultation.

The change sponsor **must** produce a consultation strategy that sets out how the change sponsor will use the most up to date and credible, clearly referenced sources of data, with modelling carried out in line with relevant best practice

- 4.51 Any data that the change sponsor intends to use during the consultation must be up to date, credible and clearly referenced, and the consultation strategy must explain what data sources the change sponsor has used and explain how any modelling has been carried out.

The change sponsor **must** produce a consultation strategy that should set out how the supporting materials will be developed to suit a range of audiences

- 4.52 Different audiences have different needs, and the change sponsor will need to consider whether it should develop supporting material to suit different audiences. All impacted stakeholders need to be able to understand the concept

of airspace change as well as the benefits and disbenefits of what is being proposed. The change sponsor may, for example, need to consider how technical information will be communicated in an accessible way for non-aviation audiences.

Consultation Materials

- 4.53 Correctly preparing both the consultation materials and questionnaire so that stakeholders who may be affected, both positively and negatively, have an appropriate opportunity to comment on an airspace change proposal based on a reasonable understanding of it, is key to the success of the consultation.

The change sponsor **must** produce draft consultation materials that are fully aligned with the consultation strategy

- 4.54 Having set out how it intends to facilitate an effective consultation in its consultation strategy, the consultation materials must reflect that strategy and be aligned with it. The draft materials the CAA will expect to see at this stage should include, where applicable, the consultation document and related questionnaire, fully developed (but unpublished) consultation pages on the Citizen Space consultations hub, the key messages that will be distributed when the consultation activity commences and samples of any related materials (for example, frequently asked questions, easy read versions, or materials for public events).

The change sponsor **must** produce draft consultation materials that clearly explain the scope of the airspace change proposal and the baseline scenarios

- 4.55 In order for stakeholders to understand the potential impacts of an airspace change proposal change sponsors must ensure that they provide clarity on what changes are being proposed as well as a clear explanation of the baseline scenarios.

The change sponsor **must** produce draft consultation materials that provide respondents with enough information to ensure that they understand the issues and the potential impacts of the airspace change proposal on them, and can give informed responses

- 4.56 Consultation materials must be designed with the audience in mind, presenting the proposals and impacts clearly and providing a narrative explaining the proposals, what the impacts will be and how, and why, the options have been developed. Being clear and up front about the reason for the consultation and what the change sponsor wants people to do will generate a better, more meaningful response.

- 4.57 Consultation materials should also include instructions that clearly explain to stakeholders what is being asked of them, so people know exactly what they need to do and where they can find the information to enable them to understand what is proposed and provide their feedback.
- 4.58 The change sponsor must include the environmental assessment in its consultation material.
- 4.59 With regards to the portrayals of environmental metrics used in the consultation material, there must also be a clear explanation of the metrics, what they mean in the context of the airspace change proposal and how they have been used by the change sponsor to decide upon a preferred design option. During the consultation, any responses from the change sponsor to consultees that relate to environmental impacts must be consistent with the requirements in [CAP 1616, Airspace Change Process](#).
- 4.60 Change sponsors should present additional analysis on any of the noise impacts if they feel it would aid stakeholders' understanding of those impacts. For example, additional noise metrics may be considered appropriate following engagement with local communities.
- 4.61 If instrument flight procedure evaluation activities have already been undertaken, the change sponsor must include the result of such activities in the consultation materials. This assists the change sponsor in identifying potential impacts and mapping potentially affected stakeholders, and allows those being consulted to see the potential impacts of different options and provide more information or comment.
- 4.62 The consultation document together with associated supporting documents must always act as the principal data source for everything presented during the consultation – taking this approach reduces the risk of additional information being presented to different audiences. However, there are other ways of presenting information that are more accessible and easier to understand, such as taking the source material in the consultation document and presenting it through other means. Examples of this would include an easy read version, information booklets, or infographics.
- 4.63 The material should also clearly explain how stakeholders can respond to the consultation and how they can contact the change sponsor with any questions or queries.
- 4.64 Change sponsors should also explain what the next steps will be, such as how the feedback will be analysed and used, and what the change sponsor will do with the findings from the consultation.

The change sponsor **must** produce draft consultation materials that do not require technical knowledge to understand and respond to (**should** for Level 2)

- 4.65 Documents must be made available in a manner that is clear and accessible to all stakeholders, as this will enable everyone to provide an informed response to the consultation. Using the right language and tone is instrumental for people to understand what is being proposed. If consultation materials are difficult to understand, then there is a risk that people will not read them, which could result in frustration and criticism about the documents and, ultimately, with the consultation.
- 4.66 Materials should be clear, short, simple to understand and easy to follow, avoiding acronyms, jargon and reliance on technical detail as much as possible. All stakeholders, including, where appropriate, those without an aviation background, should be able to understand the benefits and disbenefits of the airspace change proposal. Illustrative ways of explaining complex material can also often help people to better understand what is being proposed.
- 4.67 A glossary of terms can be a simple way for people without an aviation background to understand some of the more complex terminology by providing clear definitions that all stakeholders can understand and reference easily.
- 4.68 It may also be helpful to explain the concept of airspace change, as well as the roles and responsibilities of the change sponsor and the CAA in the airspace change process.
- 4.69 While some more complex and detailed materials may be necessary to facilitate feedback from technical audiences, these should only support information that is accessible to an everyday audience. The change sponsor may consider guidance published by [Plain English Campaign](#) and [The Consultation Institute](#) useful.
- 4.70 It is important for change sponsors to remember that accessibility will mean different things to different people, and it is not just about how the consultation document and material is written. The change sponsor may consider best practice guidance on accessibility useful, such as that produced by the Government Digital Service. This is aimed at public sector bodies that are required to comply with public sector bodies accessibility regulations, but its principles can be applied more widely.

The change sponsor **must** produce draft consultation materials that use the most up-to-date, credible and clearly referenced data with modelling carried out in line with relevant best practice

- 4.71 Any data contained in text or graphics must be clearly explained or labelled so that the source of the data, and how up to date it is, are clear to stakeholders.

The change sponsor **must** produce draft consultation materials that make clear the extent to which the change is reversible if it does not achieve the objectives it is designed to achieve

- 4.72 With the post implementation review (Stage 7) in mind, the change sponsor must make clear to stakeholders in the consultation documents the extent to which the proposed airspace change, once implemented, is reversible if it does not achieve the objectives it is designed to achieve. Airspace changes that accommodate mandatory new technology or which have strong interdependencies may be very difficult or even impossible to reverse. Therefore, where an airspace change has not achieved its objectives, the solution may need to be a redesign rather than reversion to the pre-airspace change position, especially when instrument flight procedures have been withdrawn from the UK aeronautical information publication.

The change sponsor **must** produce draft consultation materials that seek stakeholders' views using questions that are clear, appropriate and unbiased

- 4.73 The consultation questions will be the primary mechanism for gathering feedback on the airspace change proposal and as such play an instrumental role in delivering a meaningful outcome from the consultation.
- 4.74 A good questionnaire should be easy to navigate. Questions should be set out logically, and be clear to follow for the respondent, avoiding ambiguous terms which could be interpreted differently by others. Change sponsors should be clear about what information is being requested. Overly detailed, confusing or too many questions can lead to frustration and create a barrier to people responding.
- 4.75 Change sponsors should consider using different types of questions – for example open questions, closed questions or questions including ratings or scales – depending on the quantitative or qualitative information or data they are seeking from stakeholders. However, change sponsors should be careful not to limit the scope of questions asked, so that stakeholders feel they can raise any issues which are important to them.

Stage 3 (Consult/Engage) Gateway

The change sponsor **must** submit the required outputs to the CAA for assessment at the ‘consult/engage’ gateway

- 4.76 The ‘consult/engage’ gateway occurs in the middle of Stage 3. At this point, we will complete our regulatory assessment on the change sponsor’s outputs and relevant supporting evidence to determine whether the airspace change process requirements have been followed. We will review and, where appropriate, approve that the consultation strategy meets the requirements of Stage 3. We will also review a sample of the change sponsor’s consultation materials, and the full options appraisal, and provide feedback where appropriate. Once the change sponsor has passed through the Stage 3 ‘consult/engage’ gateway, they will commence consultation. There is no requirement for Level 3 airspace change proposals to pass a Stage 3 ‘consult/engage’ gateway, rather after completing Stage 3 Level 3 requirements, change sponsors can proceed directly to the Stage 4 Level 3 requirements.

Commence Consultation

- 4.77 Having passed the ‘consult/engage’ gateway, the change sponsor implements its consultation strategy.
- 4.78 During the consultation, deviations from the consultation strategy should be minimal, and only in line with previously approved escalation and extension plans which have been detailed in the consultation strategy to deal with unforeseen issues.

The change sponsor **must** implement their consultation strategy and issue the consultation documents by publishing them on the Citizen Space consultations hub

- 4.79 All consultations must be published on the Citizen Space consultations hub, which stakeholders can access through the airspace change portal.

The change sponsor **must** maintain records to demonstrate that all reasonable actions have been taken to ensure stakeholders are informed of the consultation and have been offered the opportunity to engage with it

- 4.80 The change sponsor will have set how it intended to inform audiences of the consultation in its consultation strategy, and these records form part of the evidence that the change sponsor will need to submit to the CAA alongside the final airspace change proposal at Stage 4.

The change sponsor **must** moderate responses in order to remove any unsuitable content, but not as a general means of censoring or filtering responses

- 4.81 The starting point for moderation must be to publish any response in its entirety. Subject to the permissions given by the sender, change sponsors should publish an unredacted response with the name of the sender as long as it:
- is not malicious or offensive in nature, and does not constitute a personal attack on a person’s character
 - does not break the law; this includes potentially libellous (defamatory) material concerning third parties, condoning illegal activity, and breaching copyright
 - does not incite hatred on the basis of race, religion, gender, nationality, sexuality or other personal characteristic
 - does not include swearing, hate-speech or obscenity
 - does not reveal personal details, such as private addresses, phone numbers, email addresses or other online contact details.

The change sponsor **must** publish consultation responses on the Citizen Space consultations hub

- 4.82 Consultation responses must be published on the Citizen Space consultations hub once they have been moderated by the change sponsor to remove unacceptable material. The content of all responses will therefore be visible to all on the Citizen Space consultations hub. This should ideally take place regularly during the consultation period or, if not, as soon as possible after the consultation has concluded.
- 4.83 Responses can be anonymised should someone prefer their identity to not be published and only be made available to the CAA and the change sponsor. However, the Citizen Space consultations hub will limit responses to one per individual (verified by email address).

The change sponsor **must** publish any additional consultation feedback (such as postal responses) on the Citizen Space consultations hub

- 4.84 The Citizen Space consultations hub will be the primary means of sharing information between the CAA, change sponsor and stakeholders. We do not expect the change sponsor to maintain a separate offline process. Respondents will therefore be expected to download documents from, and should be encouraged to upload their responses to, the Citizen Space consultations hub.
- 4.85 However, there are several scenarios where additional material may be gathered by the change sponsor. There remains some demand for responses to be made by post from those stakeholders who do not have adequate access to the internet. Our expectation is that the change sponsor will give instructions for the submission of postal responses to enable these stakeholders to participate in the consultation, in the same way that it should, as part of its consultation strategy, have considered whether to use printed media to publicise its consultation.
- 4.86 Similarly, while we would not expect the change sponsor to encourage it, some respondents may submit responses by email. In these situations, the change sponsor must upload any such responses to the Citizen Space consultations hub.
- 4.87 It may be that some feedback is not provided through a consultation response but more informally, for example through feedback given at public events, or comments made in private or public meetings. The change sponsor will need to decide how to introduce this feedback into the process in a transparent way. It may be that the change sponsor requests that such feedback be repeated formally via the Citizen Space consultations hub, as it may not be proportionate to record and upload every point arising. What would not be appropriate would be for the change sponsor to take such feedback into account without making it transparent that it has, or why it has done so.

The change sponsor **must** actively monitor responses during the consultation and take reasonable steps to elicit a response from stakeholders

- 4.88 If the change sponsor identifies that a question raised by a stakeholder can be answered prior to the end of the consultation, it should do so. It may be impractical for the change sponsor to respond to every consultee question individually during the consultation, but where there are common questions and requests the change sponsor should develop “frequently asked questions” (FAQ) material for publication on the Citizen Space consultations hub.
- 4.89 To encourage responses, we recommend that reminder notifications are sent at pre-determined intervals during the consultation and that a final reminder is sent towards the end of the consultation (as set out in the consultation strategy).

The change sponsor **must** monitor the progress of the consultation and, if necessary, take action in line with the consultation strategy if the strategy falls short of expectations

- 4.90 The change sponsor should review the consultation as it progresses to assess whether the methods and approach that have been adopted are delivering the right results. If not, it should take the action(s) it had outlined in the consultation strategy.
- 4.91 The change sponsor should also consider any new and specific issues being raised by stakeholders or audiences, and how it should respond to them.
- 4.92 If errors or confusion arise during the consultation process, the CAA may intervene to ask the change sponsor how they intend to remedy the problem and potentially to extend the consultation period in order to do so. In such a case, we will review the consultation strategy with the change sponsor and subsequently monitor whether it is adhered to.

Collate and Review Responses

- 4.93 After the consultation has concluded, the change sponsor must carry out a fair, transparent and comprehensive review and categorisation of consultation responses.
- 4.94 We will review a sample of the change sponsor’s categorisations to determine whether it has been done fairly. If necessary, we will ask the change sponsor to change a categorisation.
- 4.95 The change sponsor must then publish the outcome in a consultation response document.

The change sponsor **must** review the consultation responses and categorise them into those that present information that may impact the final airspace change proposal, and those which do not

- 4.96 Categorisation of consultation responses is a methodological and careful process that needs to be undertaken rigorously, and its complexity and importance should not be underestimated. Change sponsors proposing Level 1 changes should expect this to require more resource than Level 2 or Level 3 changes, as there are likely to be more stakeholder responses to catalogue and take into account.
- 4.97 The change sponsor must review the responses and categorise them into those that present information that may impact the final airspace change proposal and those which do not, including those raising issues which are outside the change sponsor's control (such as government policy). Consultation responses which may impact the final airspace change proposal will then fall into two sub-types; those which have impacted the final airspace change proposal and those which have not.

The change sponsor **must** set out clearly why it has categorised each response in the way that it has to demonstrate that it has heard and understood the feedback provided

- 4.98 When categorising consultation responses, the most important principle to adopt is transparency. The change sponsor should adopt a 'we asked, you said, we did' approach to setting out its qualitative assessment of consultation responses.

Responses which *may* impact the final airspace change proposal

- 4.99 Responses which have been categorised as having the potential to impact on the final airspace change proposal would include new information or ideas that the change sponsor believes could lead to an adaptation in a preferred design option or a new design option.

Responses which *do not* impact the final airspace change proposal

- 4.100 The change sponsor must be able to show how it has heard, understood and classified responses which do not impact its final airspace change proposal, and set out clearly why. The content of such responses would not include new information or ideas that could lead to an adaptation in a preferred design option or a new design option.
- 4.101 Such responses may still contain valuable information, and it is important that change sponsors capture and identify key themes from the consultation feedback even if they are contained in responses which do not impact the final airspace change proposal. For example, responses which criticise the consultation format should give change sponsors insight to improve future

engagement; sentiments identified around trust will help to identify areas where additional future engagement may improve relationships; and criticism of historic activity may help to avoid similar situations in future.

Responses which *have* impacted the final airspace change proposal

- 4.102 The change sponsor must show how the response has been acted on and what changes have occurred to its final airspace change proposal.

Responses which *have not* impacted the final airspace change proposal

- 4.103 The change sponsor must show why the response has not been acted on and explain why the final airspace change proposal cannot be modified to meet the recommendation.

The change sponsor **must include the categorisation for each consultation response within a consultation response document**

- 4.104 Once it has categorised the consultation responses, the change sponsor must produce a consultation response document and submit this to the CAA before publication.
- 4.105 The consultation response document should include analysis of the feedback received during the consultation, summarising key themes raised by respondents and the change sponsor's response, including which feedback or themes the change sponsor is carrying forward to Stage 4 for further consideration.
- 4.106 We will check that the topics raised in the responses when categorised have been dealt with by the change sponsor appropriately. This could be by addressing it fully, by mitigating it to the greatest extent possible (with an appropriate rationale), or by rejecting it on justifiable grounds. If necessary, we will ask the change sponsor to change a categorisation.
- 4.107 Once it has been reviewed by the CAA, the change sponsor must publish the consultation response document on the airspace change portal.

Engagement at Stage 3

- 4.108 For some airspace change proposals where the impact is low, a scaled form of consultation - engagement - may be appropriate.
- 4.109 Engagement at Stage 3 of the airspace change process still requires the change sponsor to consider the appropriate audience, methodology and materials in order to understand stakeholders' views about the impact of an airspace change proposal. However, it is usually aimed at a more targeted audience, is less formal and may adhere to a less strict timetable.
- 4.110 However, the overall aim of Stage 3 remains the same. Change sponsors must, consider the same elements provided in the guidance above for a full consultation, proportionate to the scale and impact of their airspace change proposal.

Levels 1 and 2

- 4.111 Most Level 1 and Level 2 airspace change proposals will require a consultation, but there may be some occasions where a full consultation at Stage 3 would not be meaningful or proportionate, for example, where the change sponsor has identified a very small number of impacted stakeholders.
- 4.112 In such circumstances, the change sponsor must present its rationale for this scaled approach as part of its submission at the Stage 3 'consult/engage' gateway and ordinarily should present this during the assessment meeting in Stage 1.
- 4.113 As with a full consultation, the change sponsor must submit the required outputs to the CAA for the Stage 3 gateway and collate and review the responses after it has completed its engagement activities.

Level 3

- 4.114 The extent of engagement required will depend on local circumstances and the scale and impact of the airspace change proposal and will have been discussed already at the assessment meeting with the CAA in Stage 1.
- 4.115 However, we have developed a number of pre-scaled airspace change proposal processes for commonly requested Level 3 airspace changes, which can be found in [CAP 1616h, Guidance on Airspace Change Process for Level 3 and Pre-Scaled Airspace Change Proposals](#).
- 4.116 There is no Stage 3 gateway for Level 3 airspace change proposals but change sponsors should submit their engagement strategy and associated engagement material for CAA review and confirmation that the airspace change proposal can progress to the next stage.

- 4.117 Change sponsors are not required to collate and review responses in Stage 3 for Level 3 airspace change proposals. The change sponsor's explanation of the issues raised during engagement, and its response to the identified issues, must be included as part of the final airspace change proposal submission in Stage 4. We will assess the effectiveness of the change sponsor's engagement at Stage 5.

Outputs Required During Stage 3

Before 'consult/engage' gateway (produced and published by the change sponsor)

'Develop and assess' gateway submission, including:

- full options appraisal
- environmental assessment
- any additional assessments for habitats regulations assessment as specified by the CAA
- draft consultation strategy
- draft consultation materials
- fully developed (but unpublished) consultation pages on the Citizen Space consultations hub
- completed submission checklist.

After 'consult/engage' gateway (produced and published by the CAA)

- assessment of full options appraisal
- 'consult/engage' gateway outcome.

At start of consultation (produced and published by the change sponsor)

- consultation materials.

During consultation (produced and published by the change sponsor)

- moderated consultation responses.

After consultation (produced and published by the change sponsor)

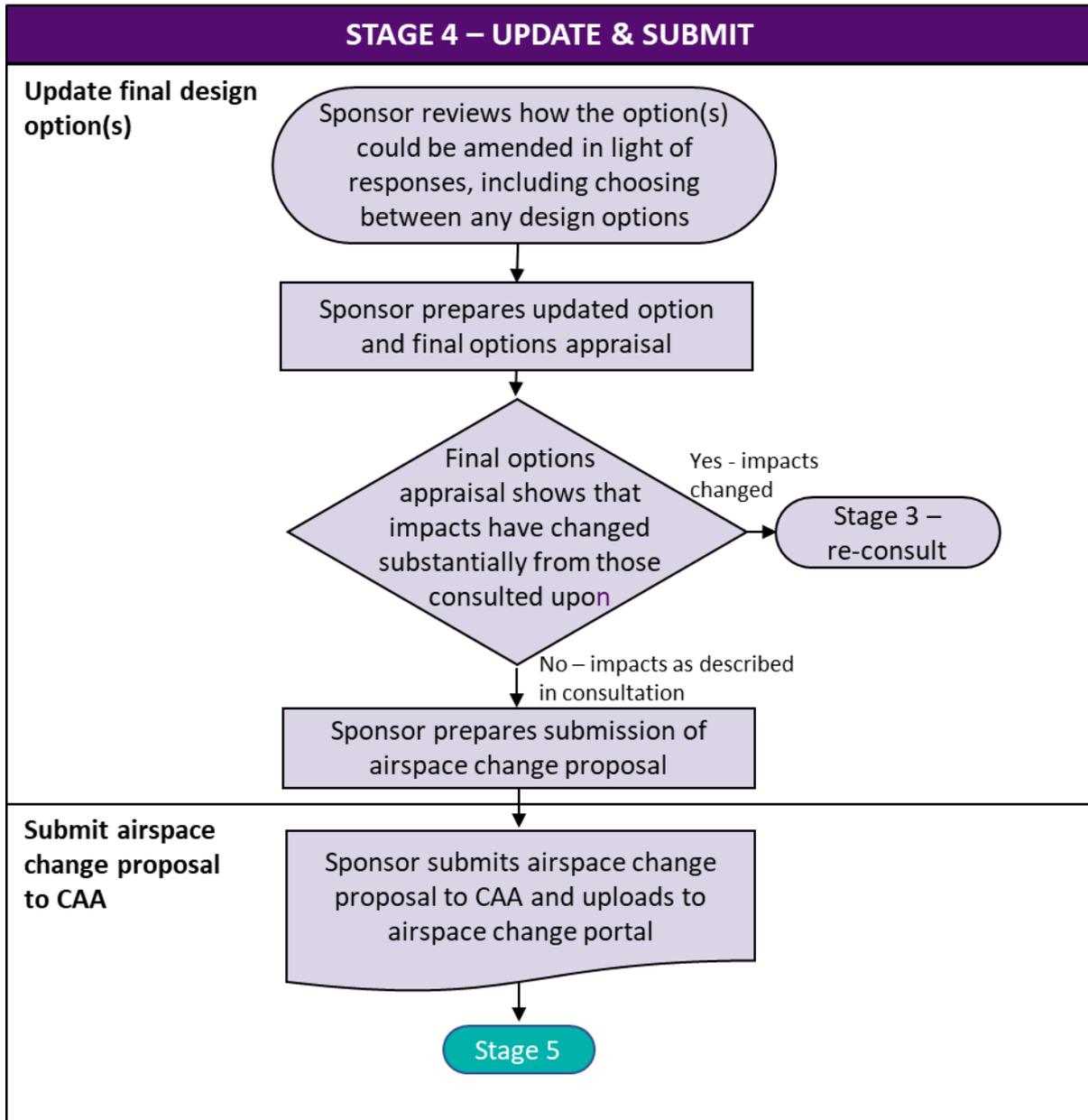
- consultation response document.

Chapter 5

Stage 4 – UPDATE and SUBMIT

Process Overview

Figure 5 Stage 4 (update and submit) process overview



Introduction

- 5.1 Having completed the ‘consult/engage’ stage, the change sponsor moves on to the ‘update and submit’ stage.
- 5.2 This is where the change sponsor will select a final design option and consider updating it in light of information received during the ‘consult/engage’ stage. The change sponsor will also conduct the final options appraisal, assess the need for additional consultation, and submit the final airspace change proposal to the CAA and stakeholders.
- 5.3 Change sponsors are supported in this stage by a checklist of requirements and a standard format template for the submission. This aids the change sponsor with ensuring that sufficiently detailed information is provided such that in Stage 5 we can make an assessment of the process undertaken in the development of the final airspace change proposal. We will conduct an assessment of the final design option against the required criteria as described by section 70 of the Transport Act 2000, the Air Navigation Guidance 2017 and other requirements placed on the CAA.
- 5.4 Stage 4 is completed with the submission of the full and unredacted version of the final airspace change proposal to the CAA, including any supplementary documents, annexes or appendices, along with publication (redacted where appropriate) on the airspace change portal.

Scaling of Stage 4

- 5.5 All change sponsors will be required to select a final design option and consider updating it in light of information received during the ‘consult/engage’ stage.
- 5.6 For Level 1 and Level 2 airspace change proposals, change sponsors must conduct a final options appraisal. Should this reveal that the impact of the final design option has fundamentally changed, change sponsors may be required to undertake additional consultation.

Update the Final Design Option

The change sponsor **must** select a final design option if more than one was consulted on, providing justification for the selection

- 5.7 Where the consultation included more than one option, the change sponsor will need to select one option to carry forward to develop their final design option, with or without any further modifications. The methodology and rationale for this selection will need to be described clearly in the final airspace change proposal.

The change sponsor **must** consider the merits and practical possibilities of updating the final design option to address issues identified in the consultation response document as requiring further consideration

- 5.8 This activity involves the change sponsor reviewing the outstanding consultation responses in the consultation response document and assessing if, and how, modifications to the design can be made to address the matters raised, even if this might involve major modifications.

The change sponsor **must** assess all feedback carried forward from the consultation response document, bringing each individual element to a conclusion as to whether it did, or did not, influence the final design option

- 5.9 It might not be possible for the change sponsor to address all matters raised during the consultation through updating the design of airspace structures. However, other ways to mitigate any potential issues might be achievable, such as by introducing or amending operating procedures defined within a letter of agreement.
- 5.10 Having considered this, the change sponsor may still determine that some matters cannot be resolved as part of their final design option. No matter what the outcome, it is important for the change sponsor to adequately assess each individual comment brought forward from the consultation response document and record if it did, or did not, lead to a change in airspace design, operating procedures, or other aspect. The rationale for these assessments is expected to be included in the final airspace change proposal, along with appropriate evidence where necessary.
- 5.11 The design, validation and implementation requirements of instrument flight procedures are described in [CAP 785B, Implementation and Safeguarding of IFPs in the UK](#), which includes the responsibilities of the change sponsor. If instrument flight procedure designs require modification, associated materials may also need to be updated.

Conduct the Final Options Appraisal

The change sponsor **must** develop the full options appraisal into a final options appraisal to consider any revised impacts due to the updated final design option and/or changes in data using the same approach as in the earlier stages

- 5.12 It is important that the analysis undertaken in the full options appraisal is updated to reflect the selected final design option and any amendments made to it. Depending on the scale of any such change to the previously consulted impacts, a qualitative and/or quantified and monetised re-assessment may be required. It is likely that an update to the options appraisal will be necessary in most cases.

- 5.13 The CAA and stakeholders will need to be able to see if any anticipated impacts have changed, for better or worse, between the full options appraisal and the final options appraisal. Therefore, the criteria and methodology used for analysing the impacts and the presentation of the information needs to be consistent with those adopted previously. Any issues with applying a consistent approach should be discussed with the CAA to determine the most appropriate course of action.
- 5.14 Due to the length of time taken to conduct Stage 3 activities and consider any design modifications, the data used to conduct the options appraisal may change between the full options appraisal and developing the final design option and completing the final options appraisal. To ensure that the assessment of the potential impacts of the final design option are as accurate as they practically can be at the point of finalising the design option, the change sponsor must use up to date, credible, and clearly referenced sources of data with modelling carried out in line with relevant best practice.
- 5.15 Even if the final design option has not been subjected to any modifications following the consultation, updates for the final options appraisal may still be required if new data has subsequently been made available.
- 5.16 The source of data and reference material needs to be clear in the final options appraisal so that the CAA, and stakeholders, can see what information was used by the change sponsor to determine the likely impacts of the final design option.

The change sponsor **must** provide a rationale for any updates made to the final design option

- 5.17 The change sponsor may need to adjust the final design option due to different factors. These could include discoveries from the consultation, the results of modelling or simulations, or from technical assessments by the approved procedure design organisation. It is important for the change sponsor to describe clearly all the changes that have been made following the consultation and why they are required.

The change sponsor **must** assess whether any of the environmental impacts have changed

- 5.18 Updates to the design, including where there have been changes to any instrument flight procedure designs, will require an assessment of whether there are changes to the environmental impacts previously consulted upon.
- 5.19 It is important for the CAA and stakeholders to see how the anticipated environmental impacts have changed following any modifications of the final design option, or any changes to the underlying data used to make the assessment. The change sponsor must perform the environmental assessment

and present related information in a manner consistent with that used throughout the consultation process.

The change sponsor **must** provide a final assessment of the impacts on safety

- 5.20 The change sponsor must review and update their safety assessment in light of any changes to the final design option as a result of Stage 3 activities. Section 70 of the Transport Act 2000 sets out the CAA's general duties in respect of its air navigation functions. The duty at section 70(1) – that the CAA must exercise these functions so as to maintain a high standard of safety in the provision of air traffic services - has priority over the other general duties.
- 5.21 As such, a detailed final safety assessment must be completed by the change sponsor and reviewed by the CAA during Stage 5. A plain English summary of the final safety assessment must be published on the online portal.
- 5.22 This final safety assessment must include:
- a description of the scope of the proposed airspace change
 - identification of the new and changing hazards
 - identification and quantification of the risks arising from those hazards
 - proposed mitigations to address the identified risks.
- 5.23 The CAA has published separate guidance regarding the conduct of safety assessments (for example, [CAP 760, Guidance on the Conduct of Hazard Identification, Risk Assessment and the Production of Safety Cases: For Aerodrome Operators and Air Traffic Service Providers](#)).

Habitats Regulations Assessment

The change sponsor **must** provide any additional assessments for the habitats regulations assessment as specified by the CAA

- 5.24 The change sponsor must contact the CAA at the earliest opportunity if they are unable to rule-out adverse effects on European sites at Stage 3. The CAA may then provide further guidance on the information it will require from the change sponsor with respect to the habitats regulations assessment. This may include details of alternative solutions to the airspace change proposal that could eliminate or reduce the adverse effects on European sites, as well as evidence to support that the proposal is required for imperative reasons of overriding public interest (IROPI) and any proposed compensation measures.

Assess the Need for Additional Consultation

The change sponsor **must** discuss with the CAA whether additional consultation is required where the final options appraisal reveals that the impacts of the final design option has substantially changed, including modifications to instrument flight procedures

- 5.25 Determining what constitutes a fundamental difference in likely impacts will depend on many factors but may involve applying judgement from subject matter experts. As such, it is important for the change sponsor to discuss with the CAA the changes in impacts of the final design option before committing to a course of action.
- 5.26 Updates that may lead to the determination that there are fundamental changes in the anticipated impacts include, but are not limited to:
- additional volumes of controlled airspace or special use airspace
 - additional air traffic service routes or instrument flight procedures
 - alteration of the intended use of airspace such that a significant number of stakeholders previously not consulted are now impacted
 - alteration of the intended use of airspace such that the scale of dis-benefits on stakeholders already consulted has substantially increased
 - change in the environmental impacts assessed in the full options appraisal.
- 5.27 We would not expect the change sponsor to re-consult on changes that only have a minor effect on the potential impacts already identified, and it is not intended that there should be a never-ending cycle of 'consult-modify-consult'.

The change sponsor **must** re-consult where there is a substantial difference between the airspace change proposal consulted on and the final design option

- 5.28 If the change sponsor is in doubt whether the modifications justify re-consultation, it should normally err on the side of doing so. We may provide guidance, but ultimately whether the change sponsor has acted reasonably will form part of the CAA's assessment of the final airspace change proposal.
- 5.29 Where it has been determined that re-consultation is necessary, the change sponsor moves back to the start of Stage 3; however, a proportionate approach should be adopted that considers the nature of the changes in the final design option following the previous consultation. This should be discussed with the CAA prior to committing to a course of action.

- 5.30 Unless the proposal has changed considerably or new people are affected, the re-consultation period can be less than the full 12 weeks.

The change sponsor **must** submit post-consultation engagement evidence, analysis, and conclusions to the CAA

- 5.31 Stakeholder engagement is an activity that occurs throughout the airspace change process. Engagement that takes place after the consultation may need to be described in the final airspace change proposal, especially where it may have influenced the final design option, associated agreements, and/or implementation requirements. As such, the change sponsor should keep records of engagement activities and outcomes during Stage 4, adopting the ‘we asked, you said, we did’ principles where appropriate.
- 5.32 It is important for the change sponsor to provide periodic updates regarding engagement activities and outcomes such that stakeholders are made aware of any developments prior to the submission of the final airspace change proposal. This is a key consideration where there has been a lengthy period between the consultation and the publication of the final airspace change proposal.
- 5.33 The airspace change portal should continue to be used throughout Stage 4 to keep stakeholders and any other interested parties up to date on the outcomes of engagement activities.

Submit the Final Airspace Change Proposal

The change sponsor **must** prepare the final airspace change proposal using the standard template format

- 5.34 The standard template format identifies the main characteristics of the airspace change proposal, drawing from the earlier outputs in the process. A list of these is contained in the final airspace change proposal template at Appendix A.
- 5.35 It is important to note that, while the final options appraisal forms part of the material to be assessed by the CAA, it serves a different function to the final airspace change proposal document(s). In principle, the reader should not need to cross-refer to the final options appraisal to understand the change and the anticipated impacts. It is likely that some information from the final options appraisal will need to be re-presented in the final airspace change proposal.

The change sponsor **must** ensure that the final airspace change proposal does not include any design elements that have not been consulted on, unless this has been approved by the CAA in advance

- 5.36 All aspects that led to the development of the final design option are required to be considered by the change sponsor and discussed with relevant stakeholders, with feedback ascertained through consultation. As such, there should be no

new design elements introduced to the CAA or stakeholders in the final airspace change proposal.

The change sponsor **must**, where relevant, ensure that their approved procedure design organisation provides the CAA with the instrument flight procedure design submission in accordance with the agreed method documented in the approved procedure design organisation's quality management system

- 5.37 Instrument flight procedures are regulated in the UK through the CAA oversight of approved procedure design organisations and the approval of the procedures before their implementation. We have a legal responsibility to ensure that only instrument flight procedures that have been deemed safe are approved.
- 5.38 The specific requirements for the oversight of approved procedure design organisations are described in [CAP 785A, Oversight of UK Approved Procedure Design Organisations](#) while the technical requirements for the approval of instrument flight procedures and the delivery of safeguarding services are published in [CAP 785B, Implementation and Safeguarding of IFPs in the UK](#).
- 5.39 The instrument flight procedure design package does not need to be sent to the CAA directly by the change sponsor, nor should these elements be uploaded to the airspace change portal. However, textual descriptions and associated graphics should be included in the airspace change proposal in the relevant sections to provide the CAA and stakeholders with a clear understanding of what the proposed airspace change involves and what the impacts are.

The change sponsor **must**, where relevant, include in the final airspace change proposal the rationale as to why no further consultation is required

- 5.40 Early in Stage 4, the change sponsor will have considered the need for further consultation. The reasoning for how the change sponsor came to this conclusion needs to be provided so that the CAA can consider it during Stage 5. This requires the change sponsor to clearly present their logic behind the decision made and any applicable evidence.

The change sponsor **must** include in their final airspace change proposal sufficient information written in plain English such that non-aviation stakeholders can understand the airspace change proposal and the anticipated impacts

- 5.41 It is important for the change sponsor to present in their final airspace change proposal a full and accurate representation of the process undertaken to develop the final design option and clearly provide all details of the changes and anticipated impacts. Not all those who may need to understand the change will be from an aviation background and therefore, although aviation can be a very

technical and complex subject, plain English explanations are required in the final airspace change proposal.

- 5.42 A proposal that does not include sufficient detail, or that is difficult to understand, could result in additional work for the change sponsor and the CAA, possibly delaying the decision-making process. The change sponsor should utilise the Stage 4 checklist of requirements as well as follow the standard format template to the maximum extent, providing succinct and clear information on the proposed changes and the anticipated impacts.
- 5.43 In Stage 5 we may offer a public evidence session for Level 1 proposals. When producing the airspace change proposal the change sponsor must be cognisant that prior to such a public evidence session (in what could be a relatively short space of time after the airspace change proposal is published) they must produce an executive summary of the airspace change proposal, a layperson's guide, and suitable graphics so that stakeholders can easily understand the potential impacts of what is being proposed. Full details of the public evidence session process are provided in the Stage 5 section of this document.

The change sponsor **must** include in their final airspace change proposal sufficient technical details such that aviation stakeholders can fully understand the airspace change proposal and the anticipated impacts

- 5.44 As well as targeting non-aviation stakeholders, the change sponsor will need to provide sufficient technical details so that the CAA and aviation stakeholders can understand the development of the final design option, the concept of operations, and the analysis undertaken that have led to the conclusions regarding the anticipated impacts, including safety.
- 5.45 For clarity, it is likely that supplementary documents, annexes or appendices may need to be used to present technical information for those that require it.

The change sponsor **must** include in their final airspace change proposal sufficient details such that the CAA can assess the airspace change proposal against the CAA's statutory duties and where applicable, government policy

- 5.46 The CAA's decision on the airspace change proposal is made in the context of a number of legal duties and where applicable, government policy.
- 5.47 It is important for change sponsors to ensure that they formulate their airspace change proposals cognisant of this legal and policy framework. Failure to do so may mean that the CAA is unable to approve their proposal.
- 5.48 Change sponsors should consider potential changes to the design against the vision and strategic objectives of the airspace modernisation strategy and the statutory factors in section 70 of the Transport Act 2000, to understand where

there may be opportunities to reduce any disbenefits, or determine if conflicts within or between any factors will remain or worsen.

- 5.49 To assist change sponsors with that task, Chapter 7 (Stage 5 – DECIDE) gives examples of the types of characteristics change sponsors should look for in helping them gauge to what extent their proposal contributes positively or negatively to the factors that the CAA must consider when deciding whether or not to approve the airspace change.
- 5.50 Information and evidence relating to these factors should be made clear in the final airspace change proposal as per the relevant sections provided in the standard template format. More detailed guidance on the CAA’s statutory duties when making airspace change decisions can be found in Chapter 7 (Stage 5 – DECIDE).

The change sponsor must include in their final airspace change proposal sufficient details such that the CAA can assess the airspace change proposal against any applicable CAA policies, including requests for policy dispensations

- 5.51 Depending on the nature of the final airspace design, there may be a number of CAA airspace policies that are key considerations for the change sponsor. The relevant aspects of these should be described where it is necessary to understand how compliance with these requirements has been assessed, or where there is a need to consider the potential for non-compliances and any associated requests for exemptions/dispensations.
- 5.52 The change sponsor may also need to describe matters relating to non-airspace regulations/policies where they are relevant to the understanding of the proposed new operation. Applications for exemptions or dispensations to these will need to be pursued outside the [CAP 1616, Airspace Change Process](#). However, this information should be included within the final airspace change proposal, especially where there are dependencies for the new operation and/or the timeline for implementation.

The change sponsor **must** include in their final airspace change proposal a realistic target implementation date that takes into account the decision process in Stage 5 and the implementation process set out in Stage 6, as well as any requirements of the change sponsor and impacted stakeholders

- 5.53 The requirements of [CAP 1616, Airspace Change Process](#) will determine some elements of the timeline, but additional aspects may be external to the airspace change process and may not be influenced by the CAA.
- 5.54 In developing a realistic implementation date, the change sponsor will need to consider all aspects of their project, such as final airspace design validation

requirements, staff training, requirements of CAA Aerodromes and Air Traffic Management, infrastructure requirements (for example, communications, navigation and surveillance equipment), finalising letters of agreement, and defined schedules for chart updates.

The change sponsor **must** include their assessment as to whether the anticipated impacts meet any of the relevant call-in criteria set out in the Air Navigation Guidance 2017

5.55 The Department for Transport will be notified once the final airspace change proposal is submitted to the airspace change portal, and the Secretary of State for Transport may determine through the call-in process that it will be decided by him/her rather than by the CAA. This activity takes place within Stage 5; however, the change sponsor will be required to present their assessment against the relevant call-in criteria in their final airspace change proposal. Full details of the call-in process and criteria to be considered are provided in Chapter 7 (Stage 5 – DECIDE).

The change sponsor **must** submit their final airspace change proposal to the CAA, noting that the technical instrument flight procedure submission (where relevant) must be submitted by the change sponsor's approved procedure design organisation

5.56 We will expect submission of the full and unredacted final airspace change proposal no later than the submission date stipulated in the agreed timeline, and will allocate resources accordingly. The method for submission of the documents is normally via email, but this may not be practicable where the documents are very large, noting that all instrument flight procedure documentation will be provided via the approved procedure design organisation.

5.57 If the change sponsor cannot meet the agreed submission deadline due to certain events the change sponsor should discuss this with the CAA at the earliest opportunity. A revised timeline may need to be agreed that includes a new implementation date.

The change sponsor **must** publish their final airspace change proposal on the airspace change portal, noting that this must not include the technical instrument flight procedure submission

5.58 We will expect the full final airspace design proposal (redacted where appropriate) to be published on the airspace change portal at the same time as being submitted to the CAA, or shortly after, noting that this should not include any instrument flight procedure documentation provided via the approved procedure design organisation.

The change sponsor **must** submit a safety case and related assessments, where required

- 5.59 The change sponsor must submit the applicable safety case and safety assessments as part of the final airspace change proposal submission following any updates to the final design option and safety assessment during the final options appraisal.

Changes to Aeronautical Information

- 5.60 As part of the development of the final airspace change proposal, change sponsors will need to identify where aeronautical information needs to be updated, for example, in the UK aeronautical information publication and charts. This is likely to be through their own reviews as well as from engagement with affected stakeholders and discussions with the CAA. It should be noted that additional engagement may be required where the change sponsor is not the data owner of the affected part of the aeronautical information publication.
- 5.61 The requirements for achieving aeronautical data quality requirements are set out in [CAP 1054, Aeronautical Data Quality – Guidance for the provision and maintenance of aeronautical data and aeronautical information in UK Aeronautical Information Products](#); it is recommended that the change sponsor discusses these aspects with the CAA prior to completing the final airspace change proposal to gain a comprehensive understanding of what is required and to obtain the latest version of the aerodata spreadsheet.
- 5.62 Not all changes to aeronautical information will be presented in an aerodata spreadsheet; where this is the case, the anticipated changes can be included in the final airspace change proposal as a supplementary document, annex or appendix.

Outputs Required During Stage 4

Final airspace change proposal submission (produced and published by the change sponsor)

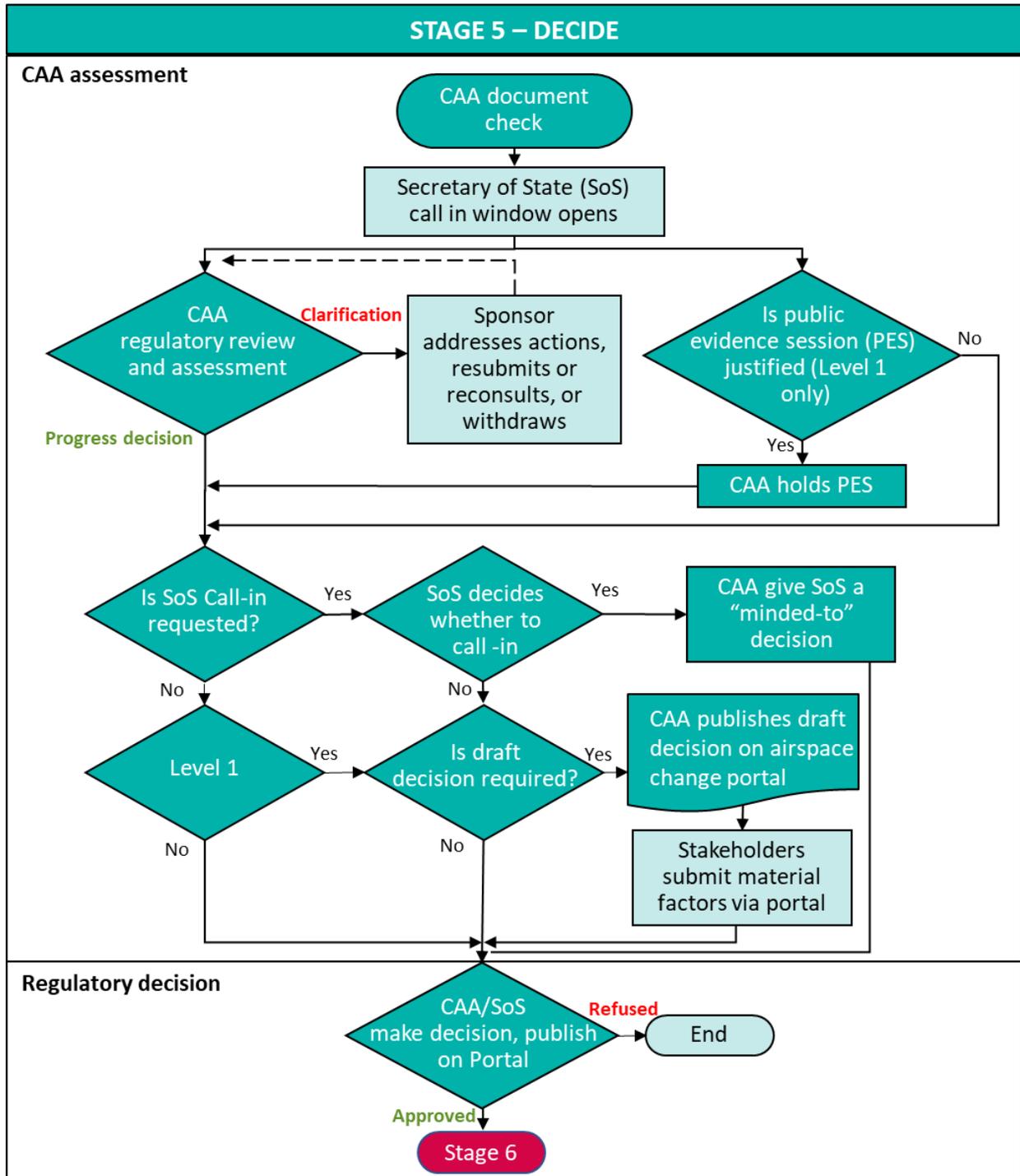
- final options appraisal and environmental assessment
- any additional assessments for habitats regulations assessment as specified by the CAA
- final airspace change proposal (in accordance with the standard template format) and all required evidence/material
- instrument flight procedure submission (if applicable) (submitted by change sponsor's approved procedure design organisation).

Chapter 6

Stage 5 – DECIDE

Process Overview

Figure 6 Stage 5 (decide) process overview



Introduction

- 6.1 Having completed the 'update and submit' stage, the change sponsor moves on to the 'decide' stage.
- 6.2 This is where the CAA reviews and assesses the final airspace change proposal, seeking further information from the change sponsor where required.
- 6.3 At this stage, stakeholders have the opportunity to request for the Secretary of State to 'call-in' the decision. Should any such request be received, we will prepare a report for the Secretary of State on whether or not the airspace change proposal, as described, meets any of the call-in criteria. If the proposal is called-in by the Secretary of State, we will prepare a 'minded to' decision.
- 6.4 For some Level 1 changes, the CAA may organise a public evidence session and/or publish a draft decision, before making a decision on whether to approve or reject the airspace change proposal.
- 6.5 The CAA's decision is made in the context of a number of legal duties and, where applicable, government policy. Our duties highlight the factors we must consider before making our decision, and these are summarised in the guidance below.
- 6.6 During Stages 1 to 4 of the airspace change process, change sponsors should ensure that they formulate their airspace change proposal cognisant of the legal and policy framework as described in this guidance. Failure to do so may mean that we will be unable to approve the final airspace change proposal.
- 6.7 Stage 5 is completed with the publication of the decision whether to approve or reject the airspace change proposal on the airspace change portal.

Document Check

The change sponsor **must** provide the CAA with all the required documentation to allow a review of the final airspace change proposal to commence

- 6.8 As explained in Chapter 6 (UPDATE and SUBMIT) We will require all submitted documentation, which will be reviewed and assessed, to be published in an unredacted readable format unless (in agreement with the CAA) there are legitimate reasons not to publish certain documents.
- 6.9 We will normally allow one week for the relevant CAA regulators to perform a check of the submission to ensure it contains the required documents to commence a review.

The change sponsor **must**, where requested, provide the CAA with any further information so that a regulatory decision can be made

- 6.10 It is recognised that, upon checking the supplied document set, we may require the change sponsor to clarify what is contained in the document set or request further documents. If this occurs, the document check period will stop and resume upon receipt of the documentation that has been requested.
- 6.11 Failure to provide a logical index of the document set (with a clear explanation (if required) in the index as to the rationale for the chronology of the documents) and/or missing documents will likely result in the document check period being extended, and the decision being delayed.

CAA Assessment and Decision Documents

- 6.12 Once the document check is complete, we will commence our review of the airspace change proposal and all the documentation and evidence accompanying it. We will then assess the submission and produce the following reports, as required²:
- **safety review/statement of acceptance:** assessing whether the proposed airspace design will maintain a high standard of safety
 - **operational assessment:** assessing the justification and options considered for the airspace change proposal, as well as the proposed airspace design and its associated operational arrangements and impacts
 - **consultation assessment:** considers if the airspace change proposal has been adequately consulted upon in accordance with the CAA's regulatory requirements and the Air Navigation Guidance 2017. This assessment also considers whether the change sponsor has categorised the responses appropriately, whether it has correctly identified the issues arising from the consultation, and has responded to those issues appropriately
 - **environmental statement:** verifies that all environmental factors have been considered in line with relevant government policy reflected in the Air Navigation Guidance 2017, plus any other request placed upon the change sponsor by the CAA or the Secretary of State
 - **final options appraisal assessment:** assessing the economic impact of the final design option compared to the baseline scenarios

² The CAA may determine that it is not proportionate to produce all or some of the reports depending on the level of the change and any scaling applied. The rationale for such a decision will be clearly explained on the airspace change portal.

- **decision log document:** containing the CAA’s decision on the airspace change proposal, and detailing the reasons on how we reached our decision within the context of our statutory duties and the policy framework. It may include any recommendations or conditions which are attached to an approval. The decision log will reference the documentation considered as part of the CAA’s assessment.
- 6.13 We will publish these reports, where relevant, on the airspace change portal shortly after the decision is made. We may issue a decision statement³, prior to publishing the document set listed above, in order for the change sponsor to meet the AIRAC schedule.
- 6.14 We will, in most cases, provide a verbal response on the outcome of the decision to the change sponsor; however, the detail of the decision will be contained in the assessment reports and decision log.
- 6.15 If an airspace change proposal is rejected, the change sponsor may make a formal request to hold a meeting with the CAA to discuss any questions it may have regarding the reasons for the decision. We may, if it is proportionate to do so, agree to hold such a meeting. The change sponsor must minute and publish the meeting minutes, unless there are reasons not to publish them (please refer to the Transparency section of CAP 1616, Airspace Change Process). The same meeting process may apply if there are conditions or modifications attached to an approval.

Secretary of State Call-in Process

- 6.16 The role of the Secretary of State to determine some airspace change proposals, rather than the CAA, is set out in the [Air Navigation Directions 2023](#).
- 6.17 The call-in process is not a CAA process; however, it is integrated into the [CAP 1616, Airspace Change Process](#) and commences immediately after the Stage 5 document check is complete.
- 6.18 Full details of the call-in process can be found on [the CAA website](#).
- 6.19 The call-in process is followed for proposals to permanently change the design of UK airspace. Level 3 airspace change proposals are unlikely to meet the criteria for a call-in due to the anticipated low impact of the change. However, we will consider each proposal on a case-by-case basis and make a determination during the document check.
- 6.20 The call-in ‘window’ will open on the airspace change portal for the airspace change proposal in question for a period of not less than 28 days. This is an

³ A decision statement will detail the changes approved or rejected, without the level of detail contained in the CAA’s assessment reports.

opportunity for stakeholders to request a call-in, not an opportunity for them to provide additional feedback.

- 6.21 Should there be a request for a call-in, we will prepare a report for the Secretary of State on whether or not the airspace change proposal, as described, meets any of the call-in criteria.
- 6.22 We have no control over the timeline which the Secretary of State will follow once the CAA report is submitted and will continue with our review and assessment of the airspace change proposal.
- 6.23 The Secretary of State will write to the CAA to inform us of their decision on whether or not to call-in the airspace change proposal and we will publish this letter on the airspace change portal.
- 6.24 There is no fixed timetable if the Secretary of State does decide to call-in an airspace change proposal, however, the Secretary of State would aim to make the final decision within three months of the date we provide our ‘minded-to’ decision⁴, or as soon as practical thereafter. The time required for consideration by the Secretary of State may need to be extended, including where the change sponsor is asked by the Secretary of State to undertake additional work.

Public Evidence Session – Level 1 Airspace Change Proposals only

- 6.25 If there is sufficient interest to justify a public evidence session, and it is proportionate to do so, we may organise and publicise a public evidence session. This is for Level 1 airspace changes proposals only. The public evidence session could be online, face-to-face, or both.
- 6.26 If we decide to convene a public evidence session, then this will add a minimum of two weeks to the assessment period. Change sponsors should consider the possibility of a public evidence session when planning their airspace change proposal timeline and discuss with the CAA as required.
- 6.27 The purpose of the public evidence session is to give an opportunity for stakeholders, other than the change sponsor, to provide the CAA decision-maker with their views on the airspace change proposal directly, in a public forum and in addition to the opportunities to provide their views at earlier stages in the process.
- 6.28 The purpose of the public evidence session is for the CAA to listen. We may ask questions, but only if we do not understand what a stakeholder or representative

⁴ The ‘minded to’ decision will contain the same information as a CAA decision with the objective of providing the CAA opinion on the proposal to the Secretary of State, who would now be the decision-maker.

is saying. There will be no opportunity for opposing parties to challenge the submissions made by other stakeholders.

6.29 The public evidence session is governed by the following principles:

- at least four weeks' notice of the public evidence session will be given on the airspace change portal once the final airspace change proposal is published
- prior to the public evidence session (in what could be a relatively short space of time after the final airspace change proposal is published) the change sponsor must:
 - produce an executive summary of its airspace change proposal – in particular, how it may differ from what was consulted upon
 - produce a layperson's guide and a graphic version of the explanation, so that stakeholders can more easily understand:
 - the potential impacts that the airspace change proposal has on them
 - what has changed between the consultation and the final airspace change proposal
- the public evidence session is chaired either by a CAA employee outside of the CAA Airspace Regulation team, or by an independent facilitator
- the public evidence session is attended by the CAA decision-maker and specialist colleagues who work on airspace matters. It is not a legal proceeding with formal rules of evidence, but it is a facilitated evidence-giving session at which representatives will be expected to speak themselves without formality or legal representation, in order to reinforce the information-receiving nature of the session
- the chair will be able to focus objectively on the key or most sensitive issues arising, and endeavour to summarise where there is agreement, where there is uncertainty, and where information or some other action is needed by any of the parties present
- we will not require a change sponsor to attend the public evidence session, as it is designed to offer stakeholders the opportunity to speak directly to the decision-maker. However, the change sponsor may be present – not to argue its case, but should the chair invite it to do so, to offer any clarification that is needed
- although the public evidence session is open to anyone to attend, we may need to limit the number of attendees in line with accommodation constraints and may ask that groups and organisations limit representatives to two or three people

- public evidence session attendees must sign in
- a series of five-minute slots will be available for booking by attendees wishing to speak; organisations representing multiple stakeholders will be able to reserve ten-minute slots
- those not attending in person will be given the opportunity to submit a written statement using a form on the online portal (or in an alternative format as agreed with us) subject to the following conditions:
 - written statements must be limited to fewer than 1,000 words
 - written statements are limited to one per individual (verified by email address)
 - written statements will be moderated by the CAA before publication to remove any unacceptable material
- we cannot give any assurance that we will take into account any written statement received more than four weeks after the public evidence session date is announced
- we will arrange for a full transcript of the statements made by all parties to be published on the online portal within two weeks; this evidence will be reviewed and taken into account by the CAA in reaching its decision
- we are unlikely to agree to give any stakeholders private sessions and stakeholders will be expected to give their views in public. Where we identify a situation that warrants a meeting, the change sponsor (if attending the session) and the CAA decision-maker need to be present. We will publish the minutes of any such meeting on the airspace change portal.

Draft Decision – Level 1 Airspace Change Proposals only

- 6.30 We will publish a draft decision on Level 1 proposals when it is considered proportionate to do so. For example, we may publish a draft decision for proposals which are highly complex or impactful, or have a high level of public interest.
- 6.31 Publishing a draft decision will add more time to the airspace change process, and in certain circumstances the delay may be disproportionate to the benefit of publishing a draft decision. In such circumstances, when we publish the final decision, we will clearly explain our reason for not publishing a draft decision.
- 6.32 The CAA's objective of publishing a draft decision for some Level 1 airspace change proposals is to ensure that the final decision is based on accurate information and is as comprehensive, clear and robust as possible. The draft decision:

- is not designed to enable stakeholders to make new representations
- should not be considered as a further opportunity to go back over material that we have already considered and addressed.

6.33 Therefore, in considering responses to the draft decision, we will not consider any representation that was, or could have been, raised at an earlier stage of the airspace change process. We will only consider comments on the draft decision that are material⁵ to the outcome.

6.34 We will publish the draft decision on the airspace change portal and will give stakeholders not less than 28 days to respond. Responses should be made using the airspace change portal, subject to the following conditions:

- responses are limited to one per individual (verified by email address) and will be published
- written statements will be moderated by the CAA before publication to remove unacceptable material
- we cannot give any assurance that we will take into account any response received more than four weeks after the draft decision is published.

6.35 If a draft Decision is published, it is likely to add a further eight weeks to the overall airspace change process and, therefore, this should be taken into account by change sponsors⁶.

6.36 We may need to extend the review and assess period depending on the feedback received as a result of publishing a draft decision. Any extension of the review and assess period will be explained on the airspace change portal.

Technical Details or Minor Amendments to Submissions

6.37 We may need to request supplementary information or technical corrections and clarifications from change sponsors where an initial assessment reveals an area of potential weakness. This may then lead to amendment of the airspace change proposal formally submitted by the change sponsor, but only to the extent that any such amendments do not substantially alter the proposal, with the purpose of rendering the proposal fit for assessment by the CAA decision-maker and/or reviewers.

6.38 This practice exists to mitigate a specific risk, which is that changes are not approved because of small errors or technical issues in the final airspace change proposal, rather than matters of substance. Rather than rejecting the airspace

⁵ This might be something that has been overlooked and could result in a significant impact to stakeholders.

⁶ The CAA **will** endeavour to highlight to the change sponsor the possibility of producing a draft decision as soon as possible in the CAP 1616 process.

change proposal and referring the change sponsor back to an earlier point in the airspace change process, a more proportionate approach is to give the change sponsor the opportunity to provide more information or clarity.

- 6.39 We may make such a request at any time during the airspace change process. Our requests will be made in writing and they will be published on the airspace change portal. The change sponsor must clearly indicate any changes to the documentation originally submitted and ensure that revised versions are published on the airspace change portal.
- 6.40 If the request for information is material to the CAA's ability to continue to progress its review and assessment then, in agreement with the change sponsor, the process may pause for a period of time (no longer than 28 days) in order for the change sponsor to carry out the required work.
- 6.41 We expect to publish a delay explanation statement on the airspace change portal where the request for information is likely to impact the target implementation date.
- 6.42 To maintain transparency, where such activity does not result in a requirement for the change sponsor to undertake additional engagement or re-consultation, the change sponsor must:
- ensure that clarifications/questions are answered and published on the airspace change portal, within any agreed delay period
 - ensure that they resubmit any updated documents as 'version 2.0' (and so on, if further revisions are needed) with any changes clearly highlighted
 - ensure that, once resolved, the CAA's request and the change sponsor's log of correspondence/meeting minutes leading to any revisions are published on the airspace change portal.
- 6.43 The CAA's expectation is that there will not be a requirement for additional engagement or re-consultation. However, the change sponsor must consider any amendments they make to their airspace change proposal as a result of clarifications/questions and inform the CAA if they believe that the amendments alter the proposal such that a degree of additional engagement or re-consultation is required.
- 6.44 The determination of what additional engagement or re-consultation may be required should take place in discussion with the CAA and as a result of a review of the proposed amendments. Regardless of the change sponsor's view, we will make our own determination as to whether or not the change sponsor's re-submission requires further engagement or re-consultation. The requirement for any further engagement or consultation will be considered against the need to be

transparent, proportionate and to ensure that stakeholders understand how any amendments or clarifications impact the airspace change proposal.

- 6.45 Should we determine that there is a requirement for further engagement or re-consultation, we will inform the change sponsor. Depending on the level of engagement or consultation that is determined to be a requirement, we may publish a statement on the airspace change portal, explaining the requirement and how they expect the change sponsor to proceed.

CAA Decision

- 6.46 The second part of Stage 5 is for the CAA, or in certain cases the Secretary of State, to decide on whether or not to approve (possibly with modifications or conditions), or reject, the airspace change proposal.
- 6.47 The Air Navigation Directions 2023 require the CAA to decide whether to approve changes to airspace design in accordance with the airspace modernisation strategy, as well as our published procedures and policy on the design and classification of UK airspace, including the airspace change process.
- 6.48 Maintaining a high standard of safety is our primary duty when we make airspace change decisions, in accordance with section 70(1) of the Transport Act 2000. Beyond this, section 70(2) requires us to consider a number of factors, including safety, security and operational and environmental impacts, some of which may conflict with others.
- 6.49 The CAA's policy approach in carrying out its duties can be found below, including what we understand those duties to mean, how we evaluate competing objectives and priorities and what evidence from stakeholders we will take into account when reaching a decision.
- 6.50 This guidance also gives examples of the types of characteristics change sponsors should look for in helping them gauge to what extent their proposal contributes positively or negatively to the factors that we must consider when deciding whether or not to approve the airspace change. It is vital that change sponsors read this guidance so that they understand the legal framework within which we make our airspace change decisions.
- 6.51 If the CAA approves the airspace change proposal, we will distribute a 'CAA AIP Change Request Authority' to the change sponsor confirming that, if required, they can submit a change request authority to the UK Aeronautical Information Service.

The Airspace Modernisation Strategy

- 6.52 The Air Navigation Directions 2023 require the CAA to maintain and keep under review the airspace modernisation strategy and to consult the Secretary of State

in relation to the airspace modernisation strategy including any current or future implementation plans associated with it. We must also report to the Secretary of State annually on the delivery of that strategy.

- 6.53 The airspace modernisation strategy lays out the overall vision for airspace modernisation by setting out the ends (strategic objectives), ways (delivery elements) and means (delivery plans) of modernising airspace. That vision is to deliver quicker, quieter, and cleaner journeys and more capacity for the benefit of those who use and are affected by UK airspace. It is underpinned by four strategic objectives (or ‘ends’) to be achieved from airspace modernisation:
- safety: maintaining and, where possible, improving the UK’s high levels of aviation safety has priority over all other ‘ends’ to be achieved by airspace modernisation
 - integration of diverse airspace users: airspace modernisation should wherever possible satisfy the requirements of operators and owners of all classes of aircraft, including the accommodation of existing users (such as commercial air transport, general aviation operations, military, taking into account interests of national security) and new or rapidly developing users (such as remotely piloted aircraft systems, advanced air mobility (aerial taxis), spacecraft, high-altitude platform systems)
 - simplification of the airspace system: consistent with the safe operation of aircraft, airspace modernisation should wherever possible secure the most efficient use of airspace and the expeditious flow of traffic, accommodating new demand and improving system resilience to the benefit of airspace users, thus improving choice and value for money for consumers
 - environmental sustainability: environmental sustainability will be an overarching principle applied through all airspace modernisation activities. Airspace modernisation should deliver the Government’s key environmental objectives with respect to air navigation as set out in the Government’s Air Navigation Guidance and, in doing so, will take account of the interests of all stakeholders affected by the use of airspace.
- 6.54 Under the Air Navigation Directions 2023, the CAA must decide whether to approve changes to airspace design in accordance with the airspace modernisation strategy. In performing this function, the CAA ensures that the proposal aligns with the vision and strategic objectives of the strategy, as well as any iterations of the airspace change masterplan, where applicable, that have been accepted into that strategy. This means that any change sponsor must take account of the airspace modernisation strategy and accepted iterations of the airspace change masterplan, where applicable, in the development of its airspace change proposal such that it is not inconsistent with the delivery of that strategy and plan.

- 6.55 For more information about the airspace modernisation strategy, including details on the ‘ways’ or elements for achieving airspace modernisation such as new airspace design, new operational concepts and implementable new technologies, see:
- [CAP 1711, Airspace Modernisation Strategy 2023–2040 – Part 1: Strategic Objectives and Enablers](#)
 - [CAP 1711a, Airspace Modernisation Strategy 2023–2040 – Part 2: Delivery Elements.](#)
- 6.56 Examples of beneficial and detrimental characteristics of an airspace change proposal which could be used to demonstrate how the proposal performs against the strategic objectives of the airspace modernisation strategy are detailed in the following section. The characteristics are examples only and are not an exhaustive list. Change sponsors do not need to meet all of the characteristics and each proposal will be looked at in its own context.
- 6.57 Not every airspace change proposal will further all the strategic objectives of the airspace modernisation strategy. Some proposals may contribute positively to one or more objectives and negatively to others. Where such conflicts arise, in deciding whether the airspace change proposal is in accordance with the airspace modernisation strategy, we will look at how the proposal performs against the strategic objectives of the airspace modernisation strategy having regard to that strategy as a whole. The CAA’s assessment will include considering how the proposal contributes to the overall aviation network rather than solely considering the proposal as an individual change.
- 6.58 Other proposals, especially those of a highly localised nature or which propose no changes to the airspace structure, may not further the objectives of the airspace modernisation strategy, but are nonetheless not inconsistent with the delivery of that strategy. This is not a bar to approval. However, change sponsors will need to provide an explanation to the CAA where they consider their airspace change proposal to be outside the scope of the airspace modernisation strategy.

The Airspace Change Masterplan

- 6.59 The airspace change masterplan is a current implementation plan associated with the airspace modernisation strategy. The purpose of the masterplan is to set out a single coordinated implementation plan for airspace changes in the UK up to 2040 to upgrade the UK’s airspace and deliver the objectives of airspace modernisation at a strategic level. In doing so, the airspace change masterplan:
- identifies where and when airspace change proposals need to be developed in coordination to support delivery of the objectives of the airspace modernisation strategy

- describes how individual airspace changes relate to each other (that is, interdependencies) and where there are potential conflicts in their proposed designs
- explains how trade-off decisions to resolve those conflicts have been made
- sets out the proposed timelines for implementation of the individual airspace changes
- demonstrates the anticipated cumulative impact of the airspace change proposals identified in the masterplan.

6.60 The airspace change masterplan consists of a series of iterations, and once they are accepted in the airspace modernisation strategy, they form a basis against which airspace change decisions are made by the CAA. In other words, for those airspace change proposals of the airspace change masterplan, the CAA must make its decisions in accordance with any accepted iterations of that masterplan and therefore in the best interests of the overall aviation network and airspace modernisation, and not just in the interests of one individual airport or air navigation service provider.

6.61 For more information about the airspace change masterplan, including the criteria against which we will decide whether to accept an iteration of the masterplan into the airspace modernisation strategy, see:

- [CAP 2156a, Airspace Change Masterplan – CAA Acceptance Criteria](#)
- [CAP 2156b, Airspace Change Masterplan – Assessment Framework.](#)

Examples of AMS Beneficial and Detrimental Characteristics

Airspace modernisation strategy strategic objective: Safety – Maintaining and, where possible, improving the UK’s high levels of aviation safety has priority over all other ‘ends’ to be achieved by airspace modernisation.

Examples of a beneficial characteristic for this objective

- Safety remains the primary consideration. The characteristics that contribute positively or negatively to maintaining a high level of safety will vary and depend on individual circumstances.

Examples of a detrimental characteristic for this objective - N/A

Airspace modernisation strategy strategic objective: Integration – Airspace modernisation should wherever possible satisfy the requirements of operators and owners of all classes of aircraft, including the accommodation of existing users (such as commercial air transport, general aviation operations, military, taking into account interests of national security) and new or rapidly developing users (such as remotely piloted aircraft systems, advanced air mobility (aerial taxis), spacecraft, high-altitude platform systems).

Examples of a beneficial characteristic for this objective

- facilitates access by diverse airspace users with a transition towards greater integration of air traffic
- no segregation (for example, aircraft types do not need to be segregated from one another, but can operate alongside one another in the same block of airspace).
- where segregation is necessary, it is proportionate (for example, in terms of volume, duration and time of day/year)
- where segregation is necessary, mitigations are put in place to reduce impacts (for example, danger area crossing service for a proposed danger area)
- facilitates the planning and ongoing demand for airspace (including utilising information available from flight intent/plan data), improving predictability for airspace users
- enables an electronically interoperable environment (for example, adoption of electronic conspicuity to enable integration)
- manages airspace in a flexible, near real-time operation (for example, maximises the amount of time that access is possible in airspace that at some point requires segregation)
- allows for operators to achieve their desired business trajectory
- greater integration of air traffic without adding undue complexity to the design of the airspace (that is, routing and procedures).

Examples of a detrimental characteristic for this objective

- fails to facilitate access by diverse airspace users
- increases segregation of airspace (for example, long/excessive periods of time set aside for airspace reservations, denying access to other users)
- airspace is designed to accommodate a use which is not supported by credible evidence (for example, larger volumes of controlled airspace than necessary)
- does not facilitate the effective use of the electronic interoperability of the airspace
- leads to a lack of interoperability between systems (for example, lack of interoperability between aircraft/remotely piloted air systems and air traffic management systems)
- reduces the ability to manage airspace in a flexible, real-time operation
- prevents, or reduces the opportunity for operators to achieve their desired business trajectory.

Airspace modernisation strategy strategic objective: Simplification – Consistent with the safe operation of aircraft, airspace modernisation should wherever possible, secure the most efficient use of airspace and the expeditious flow of traffic, accommodating new demand and improving system resilience to the benefit of airspace users, thus improving choice and value for money for consumers.

Examples of a beneficial characteristic for this objective

- introduces the least complex airspace design to satisfy the objectives of the airspace change (which may include airspace volume, airspace classification, air traffic management procedures, or a combination of any of these)
- designed to optimise aircraft equipment capabilities to maximise their best equipment performance (for example, performance-based navigation)
- removes unnecessary airspace structures and/or alters the classification freeing up airspace capacity for other airspace users
- increases the strength of airspace network resilience (for example, reduces controller intervention)
- increases capacity through optimised design
- reduces delays for airspace users and enables the network to be more effectively managed (for example, reduced need for short term air traffic flow management measures)
- enables a high proportion of predicted movements, which are planned and/or follow pre-planned paths (predictability) (for example, performance based navigation)
- greater integration of air traffic without adding undue complexity to the design of the airspace (that is, routing and procedures)
- reduces the need for airborne delays
- results in a low number of controller interactions/tactical interventions, which may include 3D/4D operations – automatically managed utilisation of 3D
- allows optimum sectorisation and/or number of air traffic controllers required to service demand
- results in a consistent application of airspace classification and the use of rules set, applicable to that classification, making it simpler for users to understand available air traffic services
- allows interoperability and consistency with international obligations including operational interfaces.

Examples of a detrimental characteristic for this objective

- introduces and/or retains unnecessary complexities in airspace design
- prevents the use of the best aircraft equipment capabilities (for example, is designed with a lower navigational specification thus leads to larger volumes of airspace forming part of the design)
- results in the creation and/or maintenance of otherwise unnecessary airspace structures
- reduces the strength of airspace network resilience (for example, increases need for tactical controller intervention by radar vectoring)
- decreases capacity through poor design

- increases the need for air traffic flow management thus the potential for delays for airspace users (for example, increased need for short term air traffic flow management measures)
- reduces the predictability of air traffic movements
- increases the need for airborne delays
- increases number of controller interactions/tactical interventions
- difficulty for operators to navigate as they move from one type of airspace to another (that is, complex boundaries)
- increases flight deck workload and air traffic controller overload (for example, increased pilot radiotelephony to request clarification of level, route etc.)
- does not allow for interoperability and consistency with international obligations.

Airspace modernisation strategy strategic objective: Environmental sustainability –

Environmental sustainability will be an overarching principle applied through all airspace modernisation activities. Airspace modernisation should deliver the Government's key environmental objectives with respect to air navigation as set out in the Government's Air Navigation Guidance and, in doing so, will take account of the interests of all stakeholders affected by the use of airspace.

Examples of a beneficial characteristic for this objective

- demonstrates that the environmental objectives of the Air Navigation Guidance 2017 have been met at a system-level
- enables improvements to environmental impacts, or at least, no reduction in the level of environmental impact or protection at a system-level.

Examples of a detrimental characteristic for this objective

- fails to demonstrate that the environmental objectives of the Air Navigation Guidance 2017 have been met at a system-level
- Worsens environmental impacts or the level of environmental protection at a system-level.

Section 70 of the Transport Act 2000

- 6.62 Section 70(1) of the Transport Act 2000 places the CAA under a general duty when deciding whether to approve airspace change proposals to do so in a way that maintains a high standard of safety in the provision of air traffic services. That duty is to have priority over the CAA's other duties in this area of work. Beyond this, section 70(2) requires us to consider a number of factors, including operational and environmental impacts, some of which may conflict with others. Therefore, it is important for details relating to these factors to be made clear in the final airspace change proposal. The following paragraphs describe, with context, how the CAA assesses the factors in section 70(2) of the Transport Act 2000 when making its decision.
- 6.63 Section 70(2)(a) - We have the duty to secure the most efficient use of the airspace consistent with the safe operation of aircraft and the expeditious flow of air traffic. We regard an efficient use of a scarce resource as one that makes the best use of it. In determining the best use of airspace, we have identified the different elements that could make up an airspace change and its consequences, applying recognised principles of statutory interpretation. For example, because section 70(2)(a) explicitly refers to both the efficient use of airspace and the expeditious flow of aircraft, the latter cannot be viewed as a synonym for the former. Therefore, while expeditious flow may contribute to the efficient use of airspace and is therefore a consideration in determining efficient use of airspace, efficient use of airspace must mean something different. Similarly, the matters set out in sections 70(2)(b) to (g) cannot be viewed as characteristics of an efficient airspace change; they are different material factors and, applied individually, would yield different outcomes.
- 6.64 We consider the most efficient use of airspace to mean the most aircraft movements through a given volume of airspace over a period of time in order to make the best use of the limited resource of UK airspace from a whole system perspective. We consider the expeditious flow of air traffic to be the shortest amount of time that an aircraft spends from gate to gate, from the perspective of an individual aircraft, rather than the wider air traffic system. Therefore, we would regard the increased efficiency of an individual flight, sometimes referred to as flight efficiency, as a factor in expeditious flow rather than an efficient use of airspace⁷.
- 6.65 The CAA may consider multiple factors in assessing a proposal against the duty of making the most efficient use of airspace. Those factors may also be relevant

⁷ It is a standard feature of airspace management that the most expeditious flow for an individual aircraft is sacrificed in the interests of the most efficient use of airspace, that is aircraft do not fly their most direct route to their destination; they fly their most direct route permitted by air traffic control within an airspace structure designed to make the most efficient use of airspace, from a whole-system, all-aircraft, perspective.

to the CAA's other section 70(2) duties. In general, the CAA will be guided by the factors that contribute to an efficient use of airspace (please refer to Page 115), but not all will be relevant in a given airspace change proposal, and some may actually oppose each other.

- 6.66 When approaching this duty, we consider all airspace affected by the airspace change proposal and not only the airspace that is the subject of the airspace change proposal. To judge this, we regard the appropriate metric as the number of aircraft through a given volume of airspace. While it is theoretically possible to attribute a value to different types of use of airspace, and/or to measure the efficient use of airspace in terms of the number of passengers, these metrics are not currently technically feasible. In assessing the efficient use of airspace, we will therefore count each aircraft, whatever its size or purpose, as one. In July 2019, the High Court ruled that “the most efficient use of airspace” is capable of referring to an increase in the capacity of airspace to accommodate aircraft movements as well as, or in addition to, actual numbers. The court ruled that the CAA is not confined to considering a predicted increase in movements “as a matter of fact”, given that the CAA is dealing with evaluations and predictions⁸.
- 6.67 Section 70(2)(b) - We have a duty to satisfy the requirements of operators and owners of all classes of aircraft.
- 6.68 Section 70(2)(c) - We have a duty to take account of the interests of any person (other than an owner or operator of an aircraft) in relation to the use of any particular airspace or the use of airspace generally. We interpret ‘any person (other than an operator or owner of an aircraft)’ as including airport operators, air navigation service providers, people or businesses on the ground who may be affected by aviation noise or other environmental impacts (although the environmental impacts on all stakeholders is also considered separately), passengers on aircraft, owners of cargo being shipped by air, or anyone else affected by an airspace change proposal.
- 6.69 Section 70(2)(ca) - We are required to take into account any guidance relating to spaceflight activities. In September 2021, the Department for Transport issued additional guidance under this section which modifies certain sections in the Air Navigation Guidance 2017 relating to the calculation of environmental impacts of proposed changes to airspace design that facilitate spaceflight activities.
- 6.70 Section 70(2)(d) - We are required to take into account the Air Navigation Guidance 2017. In the Air Navigation Guidance 2017, the Government has set environmental objectives with respect to air navigation. These environmental

⁸ Lasham Gliding Society Ltd, R (On the Application Of) v Civil Aviation Authority, England and Wales High Court (Administrative Court) (31 July 2019).

objectives are designed to minimise the environmental impact of aviation within the context of supporting a strong and sustainable aviation sector.

- 6.71 Section 70(2)(e) - We have a duty to facilitate the integrated operation of air traffic services provided by or on behalf of the armed forces of the Crown and other air traffic services.
- 6.72 Section 70(2)(f) - We have a duty to take account of the impact any airspace change may have upon matters of national security.
- 6.73 Section 70(2)(g) - We have a duty to take account of any international obligations of the UK notified to the CAA by the Secretary of State. No such international obligations have been notified to the CAA.
- 6.74 Where a proposed airspace change would contribute positively to some of the material factors, but negatively in respect of others, section 70(3) refers to this situation as a conflict. Section 70(3) then requires the CAA to apply those material factors in the manner it thinks is reasonable having regard to them as a whole.
- 6.75 As a starting point, when considering a proposal, the CAA will give its duty to 'secure' something higher weight than its duty to 'satisfy' or 'facilitate'. For example, the CAA would give the obligation to secure the most efficient use of airspace greater weight than the obligation to satisfy owners and operators of aircraft. The CAA regards the term 'to take account of' as meaning that the factors in question may or may not be applicable in a particular case (for example, national security) and also that the range of ways they could affect our decision could be wide. This means that, sometimes, a factor we must 'take account of' is prioritised over one we need to 'secure'. Not all of the factors will be relevant in all airspace change proposals.
- 6.76 The change sponsor should endeavour to determine any areas of conflict prior to formally submitting its airspace change proposal. In such cases, the CAA may be prepared to provide guidance to change sponsors, prior to the proposal being submitted formally, about how this conflict could be minimised, including encouraging the change sponsor to engage as appropriate with affected stakeholders about how this might be achieved. A summary of any such guidance will be published on the portal.
- 6.77 As envisaged in section 70(3), there may be good reasons why the CAA would not always give greater weight to the matters that it is required to secure. Some examples are given below, but this list is not exhaustive:

- local circumstances – such as where the CAA might make an airspace change that takes account of the noise of aviation over the ability to secure the most efficient use (that is, where design principles, as described in Stage 1 of the process, mean an airspace design creates less efficient paths that avoid a population centre, where this is supported by the change sponsor and by local communities)
- interdependencies – such as where the CAA might make an airspace change decision that reduces the efficient use of airspace or does not meet the requirements of operators and owners in order to meet an international obligation
- magnitude of the impact – such as when the impact of an airspace change on a higher- weight objective is small, whereas the impact on a lower-weight objective is large
- complexity of the airspace – such as when an airspace structure modified through the consultation process in an attempt to meet different user requirements may render it safe, but almost unusable by operators or owners of aircraft, or unworkable by air traffic control
- airspace not at full capacity – such as when it is deemed that securing the efficient use of airspace is less important and it could be appropriate to increase the weight placed on other factors.

6.78 For the avoidance of doubt, it should be noted that the obligation on the CAA in section 70(3) is not fulfilled by securing the most efficient use of airspace. That objective, in section 70(2) (a), is just one of the section 70(2) factors that the CAA must consider in making its decision.

6.79 The characteristics described below act as guidance for airspace change sponsors to help them gauge whether or not any of the statutory factors are in conflict (section 70(3) of the Transport Act 2000). If there is conflict between any factors, this does not mean that the proposal automatically fails and is refused by the CAA. What it does mean is that the CAA will need to use its judgement and discretion to apply the factors in the manner it thinks is reasonable having regard to them as a whole and that the proposal may be approved. The examples are not an exhaustive list, nor should they be taken as examples that will demonstrate a factor under every circumstance. However, it is expected that for most proposals that reflect these examples, there will be evidence that a change sponsor has considered the factor in question.

6.80 While some of the beneficial and detrimental characteristics for the strategic objectives of the airspace modernisation strategy may appear to be seeking the same or similar information as those for the statutory factors in section 70 of the Transport Act 2000, it is important that sponsors have considered how their proposal contributes to each in their own right. When judging a proposal against

the airspace modernisation strategy, the CAA's assessment will include considering how the proposal contributes to the overall aviation network rather than solely considering the proposal as an individual change.

Examples of Section 70 Beneficial and Detrimental Characteristics

Transport Act 2000 section 70(2)(a)

“to secure the most efficient use of airspace”

The efficient use of airspace is defined as:

“The most aircraft movements through a given volume of airspace over a period of time in order to make best use of the limited resource of UK airspace from a whole system perspective.” (See also the High Court judgment referred to in Chapter 7 (Stage 5 – DECIDE))

Examples of a beneficial characteristic for this factor

- enables more aircraft than is currently the case to use the airspace and there is a likelihood that capacity will be utilised
- the volume of regulated airspace (meaning controlled and subject to a classification other than G) is appropriate (including any buffer) for operations intending to use the airspace but no bigger
- airspace classification is appropriate for operations intending to use the airspace but classification is no higher than necessary
- high proportion of movements are sequenced
- high proportion of movements take place alongside aircraft with similar capability (uniformity)
- high proportion of movements are planned and/or follow pre-planned path (predictability) (assuming a high demand for use of a particular airspace)
- low number of controller interactions
- least complex airspace design appropriate for the intended utilisation (one way of achieving this is systemised airspace, for example, performance based navigation)
- enables access to airspace in a flexible way (see note below)
- appropriate surveillance capability for the intended use in accordance with national policy
- minimises the occurrence of ‘choke-points’.

Note: Arrangements that better support access to shared airspace for all users could take various forms, such as:

- a letter of agreement (LoA) – an operational agreement between an air navigation service provider and airspace users, usually bilateral, giving primacy to specified airspace users in a defined region of airspace at specified times under specified conditions; some examples can be viewed on the British Gliding Association website <https://members.gliding.co.uk/library/loas/>
- switching the airspace classification according to time of day; for example, where a commercial aerodrome has no night-time operations, the classification is downgraded during those hours according to a fixed schedule which is recorded and published in the UK aeronautical information publication.
- a more dynamic variant of the second example above, but for safety and efficiency reasons this would first require enabling technology such as real-time information sharing using electronic conspicuity; it therefore remains a longer-term ambition, to be built into future airspace structures once the CAA is satisfied that a safe and tested regulatory solution is in place.

Examples of a detrimental characteristic for this factor

- reduces/restricts the total number of aircraft movements
- existence of obsolete or unused procedures and/or profiles
- inappropriate airspace classification that results in a reduction in the total number of aircraft in an airspace, for example because the airspace is classified as X when all the other factors in fact only require Y
- a greater need for tactical interventions
- a high number of controller interactions.

Transport Act 2000 section 70(2)(a)

“the expeditious flow of air traffic”

Examples of a beneficial characteristic for this factor

- enables optimum routes (vertical and/or horizontal)
- enables trajectory-based operations and free route airspace
- short or no delays (airborne holding or on the ground).

Examples of a detrimental characteristic for this factor

- increases gate-to-gate times
- creates sub-optimal routes, for example, longer track miles, stepped climbs/descents.

Transport Act 2000 section 70(2)(b)

“to satisfy the requirements of operators and owners of all classes of aircraft”.

Examples of a beneficial characteristic for this factor

- satisfies the requirements of all operators
- minimum financial cost to operators using airspace (that is, minimum cost of capability/equipment) (equipment)
- enables trajectory-based operations and free route airspace
- establishes the least restrictive airspace structure
- enables the most fuel efficient routes to be flown thereby reducing the cost of fuel for operators.

Examples of a detrimental characteristic for this factor

- fails to satisfy the requirements of all operators in an equitable manner
- restricts access for some operators
- increases costs to aircraft operators for access to airspace.

Transport Act 2000 section 70(2)(c)

“to take account of the interests of any person (other than an operator or owner of an aircraft) in relation to the use of any particular airspace or the use of airspace generally”.

Examples of a beneficial characteristic for this factor

- no increase or a reduction in third-party safety risk
- no reduction or an improvement in third-party impact
- meets known requirements of interested parties, for example air navigation service providers, airports, government (local and national), non-governmental organisations, residents, general public
- no negative impact on other commercial interests.

Examples of a detrimental characteristic for this factor

- increases third-party safety risk
- a potential reduction in competition in a particular market – for example, between competing airports or operators
- consequences that run counter to government policy or instruction
- increases public annoyance due to overflights
- negative impact upon tranquillity of National Parks, Areas of Outstanding Natural Beauty (AONB), National Scenic Areas (NSA) and designated Quiet Areas.

Transport Act 2000 section 70(2)(d)

“to take account of any guidance on environmental objectives given to the CAA by the Secretary of State”.

Examples of a beneficial characteristic for this factor

- demonstrates that the requirements and priorities of the Department for Transport’s Air Navigation Guidance 2017 have been met
- improvements to environmental impacts, or at least no reduction
- improvements or no impact on any environmental factors required by the CAA.

Noise

Limits and, where possible, reduces the number of people in the UK significantly affected by adverse impacts from aircraft noise, by, for example:

- using more noise efficient operational practices
- minimising total population overflown
- minimising the number of people newly overflown
- enabling more continuous climbing and descending based on aircraft capability
- avoiding population centres and noise-sensitive areas
- enabling aircraft to navigate more accurately around population centres and noise sensitive areas
- demonstrating a broad range of options and flexibility in the approach to noise management to accommodate the needs of community stakeholders.

Greenhouse gas emissions

Ensures that the aviation sector makes a significant and cost-effective contribution towards reducing global emissions, by, for example:

- reducing total annual emissions
- enabling more direct flightpaths / fuel-efficient routes
- enabling more frequent continuous climbing and descending
- reducing the time taken for climbing aircraft to reach their optimum cruising altitude
- reducing the need for holding.

Local air quality

Minimises local air quality emissions and in particular ensure that the UK complies with its international obligations on air quality, by, for example:

- minimising the impact on the overall air quality pollution levels in the local area
- complying with national air quality objectives and air quality standards, including limit and target values in the UK Air Quality Strategy

Examples of a detrimental characteristic for this factor

- fails to demonstrate that the requirements of the Air Navigation Guidance 2017 have been met
- worsens any environmental impacts
- negatively impacts any of the environmental factors required by the CAA.

Noise

- fails to introduce climbing and descending performance based on aircraft capability
- overflies population centres and noise sensitive areas
- introduces an inappropriate mix of options for noise dispersal and concentration

Greenhouse gas emissions

- increases total annual emissions
- creates routes with longer track miles
- introduces stepped climbs and descents / maintains inefficient climb and/or descent profiles
- increases the time taken for climbing aircraft to reach their optimum cruising altitude
- increases the need for holding.

Local air quality

- contributes to the overall air quality pollution levels in the local area
- breaches national air quality objectives and air quality standards, including limit and target values in the UK Air Quality Strategy.

Transport Act 2000 section 70(2)(e)

“to facilitate the integrated operation of air traffic services provided by or on behalf of the armed forces of the Crown and other air traffic services”.

Examples of a beneficial characteristic for this factor

- facilitates Ministry of Defence access where required
- maintenance of tactical freedom

- use of common communication, navigation, surveillance platforms negating technical non-compatibility
- technical interoperability.

Examples of a detrimental characteristic for this factor

- increases unnecessary costs imposed on Ministry of Defence
- inadequate access for Ministry of Defence
- increases resource implications for military lower airspace radar services units.

Transport Act 2000 section 70(2)(f)

“to take account of the interests of national security”

Examples of a beneficial characteristic for this factor

- maintains or improves national security
- improves the ability to react to national security needs.

Examples of a detrimental characteristic for this factor

- weakens national security
- negative impact on tactical freedom/military training.

Timelines

6.81 The CAA offers a key performance indicator of the time period for the decision at Stage 5, in the form of ‘best endeavours to make the decision within 17 weeks for Level 1 changes (16 weeks + one week for document check) or 10 weeks for Level 2 and Level 3 changes, subject to the change sponsor also meeting its time commitments’. Note that the timelines for the decision making step of the airspace change process can also be scaled.

6.82 Adherence to any timescales will be dependent on:

- the timeline provided by the change sponsor for the submission of the final airspace change proposal at Stage 4, subject to our agreement
- the CAA and change sponsor agreeing and adhering to those deadlines
- whether or not the change sponsor has fulfilled the requirements set out in this guidance and submitted a proposal that does not require clarification
- whether we hold a public evidence session
- whether we publish a draft decision.

Review of a CAA Decision

6.83 There is no appeals mechanism in the airspace change process in respect of an airspace decision or its terms and conditions. All CAA decisions are subject to

judicial review, a legal challenge to the High Court on the fairness and lawfulness of the process followed by the CAA in reaching a decision. Detailed guidance on the judicial review process can be found on the [Courts and Tribunals Judiciary website](#).

Outputs Required During Stage 5

Output from Stage 5 CAA regulatory assessment (by whom produced and published - in brackets)

- confirmation that document check is complete (CAA)
- date of any public evidence session – Level 1 only (CAA)
- if required for a public evidence session, an executive summary of the airspace change proposal – Level 1 only (change sponsor)
- if required for a public evidence session, an executive summary of the airspace change proposal with associated guide and graphics (some Level 1 changes only)
- transcript of any public evidence session – Level 1 only (CAA)
- minutes of any additional meetings between the CAA and stakeholders that form part of the public evidence session - Level 1 only (CAA)
- request for any further technical details or minor amendments (CAA)
- response or revised airspace change proposal as ‘version 2.0’ (and so on, if further revisions are needed if any) (change sponsor)
- draft decision document/minded-to decision – Level 1 only (CAA)
- feedback on any draft decision document – Level 1 only (affected stakeholders, moderated by the CAA prior to publication)
- Secretary of State call-in requests (affected stakeholders, moderated by the CAA prior to publication)
- assessment of whether the airspace change proposal meets one or more of the call-in criteria, where a call-in request has been made (CAA)
- any notification that the airspace change proposal is eligible for call-in and has been called-in by the Secretary of State (where relevant) and if subsequently called in, a ‘minded to decision’ (Department for Transport).

Output from regulatory decision (CAA and/or Department for Transport)

Possible decision documents including:

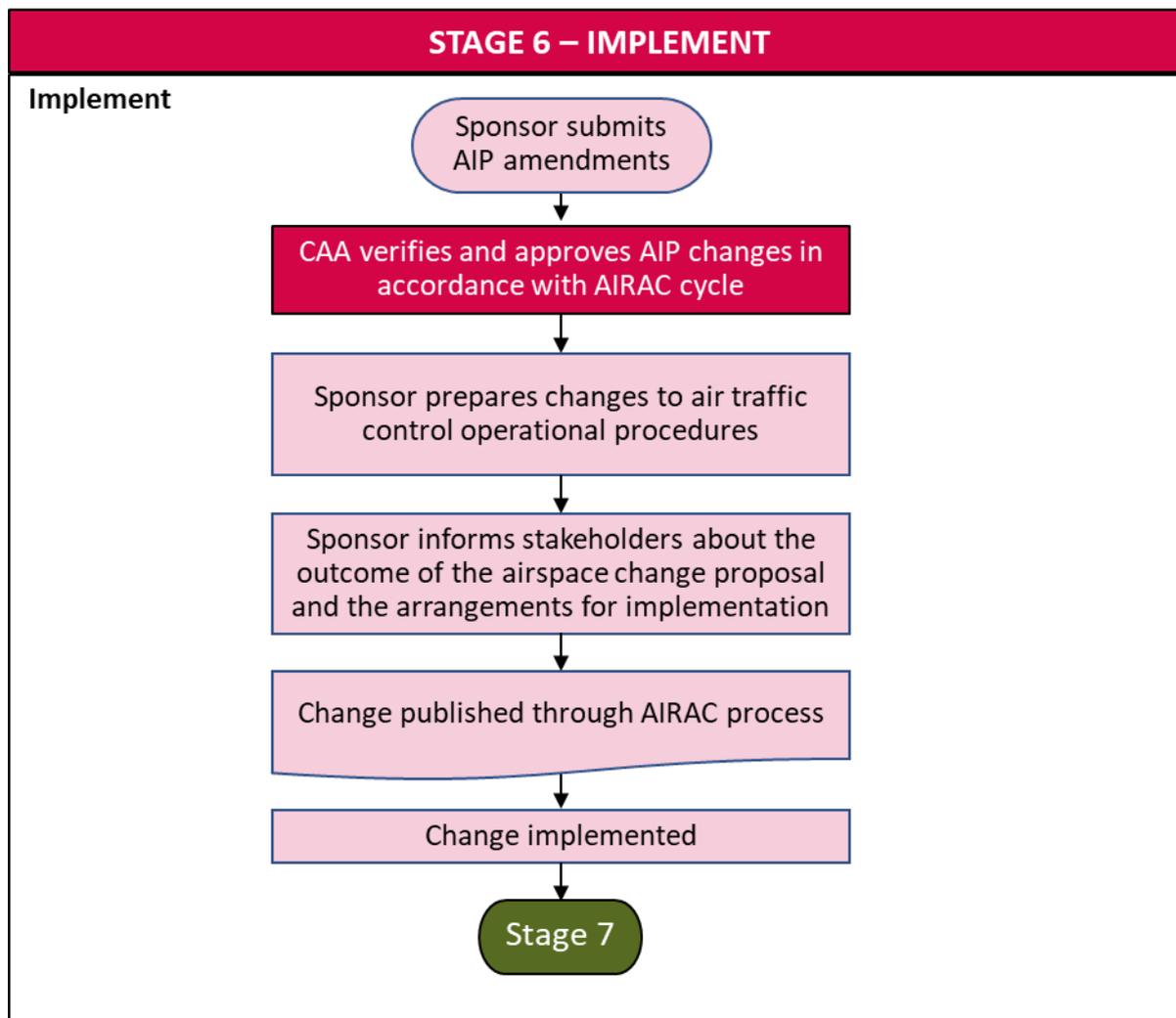
- decision statement
- CAA final options appraisal assessment

- CAA safety review (plain English summary)
- CAA operational assessment
- CAA consultation assessment
- CAA environmental statement
- CAA decision log (explanation of how we reached our decision and required conditions/modifications).

Chapter 7

Stage 6 – IMPLEMENT

Process Overview

Figure 7 Stage 6 (implement) process overview

Introduction

- 7.1 Having completed the 'decide' stage, the change sponsor moves on to the 'implement' stage.
- 7.2 This is where the change sponsor engages with the UK Aeronautical Information Service to make the changes necessary in the UK aeronautical information publication and other national regulatory documents. Once implemented, the change sponsor will monitor the impacts of the airspace change, by collating and reviewing feedback from stakeholders.
- 7.3 Stage 6 is completed when the airspace change is implemented, as agreed by the CAA.

Implementing the Change

The change sponsor **must** fulfil any conditions or modifications set out in the CAA's regulatory decision

- 7.4 When we make a decision to approve an airspace change proposal at Stage 5, there may be conditions or modifications attached to the decision. Change sponsors must address the modifications or conditions during implementation of the airspace change, which will be assessed during the post implementation review at Stage 7.

The change sponsor **must** finalise and submit aeronautical data to the CAA for aeronautical data quality validation

- 7.5 The change sponsor is responsible for finalising the aeronautical data submitted to the CAA at Stage 4. The requirements for achieving aeronautical data quality requirements are detailed in [CAP 1054, Aeronautical Data Quality – Guidance for the provision and maintenance of aeronautical data and aeronautical information in UK Aeronautical Information Products](#). Once the aeronautical data has been finalised, it must be submitted to the CAA for validation. Following aeronautical data quality validation, the aeronautical data must be submitted to the UK Aeronautical Information Service for publication in accordance with the approved AIRAC cycle.

The change sponsor **must** update all relevant documentation including, but not limited to, aeronautical publications, charts, operational documentation, letters of agreement and air traffic management systems

- 7.6 Proposed amendments to the aeronautical information publication which do not require aeronautical data validation should be submitted to the CAA in a format that clearly identifies the paragraph or table number, the current text and the proposed change. We will verify and approve the aeronautical information

publication changes, at which point the information can be sent to the UK Aeronautical Information Service in accordance with the approved AIRAC cycle.

7.7 The change sponsor should submit a change management plan, with associated timelines, to the CAA for review at Stage 5. This does not form part of the decision making process but provides the CAA with the opportunity to assess how the changes will be implemented and to give feedback on areas that may not have not been considered by the change sponsor. The following items should be considered for inclusion in the plan:

- the change must comply with the air navigation service provider's published change management process
- updating of local operational documentation such as the manual of air traffic services part 2, though the issuing of supplementary instructions/temporary operating instructions, as appropriate
- updating of any additional related documentation, including maps, radar displays/overlays, controller information displays etc.
- coordination with other air navigation service providers impacted by the change, including the update of relevant letters of agreement
- training plans and methods of assessment of affected personnel (air traffic control officers, engineers etc.), accounting for the notification and approval period required by CAA Aerodromes and Air Traffic Management
- consideration of any trial/evaluation period, prior to full implementation
- updating of equipment and systems including communication, navigation and surveillance and IT systems
- instrument flight procedure validation and implementation timelines (see [CAP 785B, Implementing and Safeguarding of IFPs in the UK](#))
- changes to ground infrastructure, including the requirement for flight inspection and any consequential impacts to existing instrument flight procedure.

The change sponsor **should** consider the extent of the aeronautical information publication amendments as a whole, including those of adjacent aerodromes and/or neighbouring states

7.8 As part of the implementation process, the change sponsor should consider the extent of the aeronautical information publication amendments that its airspace change will generate. Changes that result in flight planning arrangements should be co-ordinated with NATS Operations Policy. In the case of airspace changes in the vicinity of an airport, these may go beyond the change sponsor's entry in the aerodrome (AD) section and require changes to the en-route (ENR) and general (GEN) sections or the aerodrome entries of adjacent aerodromes in the

aeronautical information publication. Similarly, en-route or off-route changes may impact upon standard instrument departures, standard instrument arrivals, instrument flight procedures and terminal airspace structure charts within the aerodrome section. En-route or off-route changes may also impact upon the airspace structures of adjoining states. The change sponsor should therefore consider the impacts upon the aeronautical information publication as a whole, and possibly the aeronautical information publications of neighbouring states. We can provide advice if requested, but responsibility rests with the change sponsor.

The change sponsor **should** consider how to notify relevant stakeholders

- 7.9 The CAA's (or, if applicable, the Secretary of State's) decision will have been published on the airspace change portal and is therefore visible to all. Change sponsors should also consider how to notify relevant stakeholders such as members of the local community and other stakeholder groups about the ultimate outcome of the consultation and the decision. In order to publicise a forthcoming change to as many airspace users (and perhaps service providers) as possible, the change sponsor should consider contacting the Ministry of Defence, the commercial general aviation press, local general aviation events, relevant community organisations and the local press, as well as using social media and the change sponsor's own website. All that may be needed is a reference to the online airspace change portal where the decision has been published.
- 7.10 Most importantly, this means letting those impacted know when they may begin to experience changes, how the change sponsor intends to manage the transition from the change process to business as usual, and that there will be a post implementation review.

The change sponsor **should** bring the airspace change to the attention of the aviation community

- 7.11 In addition to the formal promulgation of the airspace change, the change sponsor should bring it to the attention of the aviation community. This will often initially take the form of an aeronautical information circular outlining the details of the change including effective date and, where appropriate or feasible, a map of the revised airspace structure. Ideally, any such aeronautical information circular should be published at least one month prior to the distribution of the aeronautical information publication amendment containing the airspace change.

Monitor the Impacts of the Change

The change sponsor **must** continue to engage with stakeholders and review and collate feedback received regarding the impacts of the airspace change (note this is in addition to the requirements of the post implementation review at Stage 7)

- 7.12 During the first year of implementation, and prior to the CAA instigating the post implementation review (see Stage 7), the change sponsor may receive feedback on the impact of the airspace change (if the CAA also receives feedback during this period, then we will send this to the change sponsor). The change sponsor must normally continue to engage with its stakeholders during this first year of implementation.

The change sponsor **must**, if problems arise, consider what steps it can take to address those problems within the constraints of the final airspace design

- 7.13 If problems arise, then the change sponsor must consider what steps it can take to address those problems. Any actions taken to address problems must remain within the constraints of the airspace design approved by the CAA.

Outputs Required During Stage 6

Output from Stage 6 (by whom produced and published - in brackets)

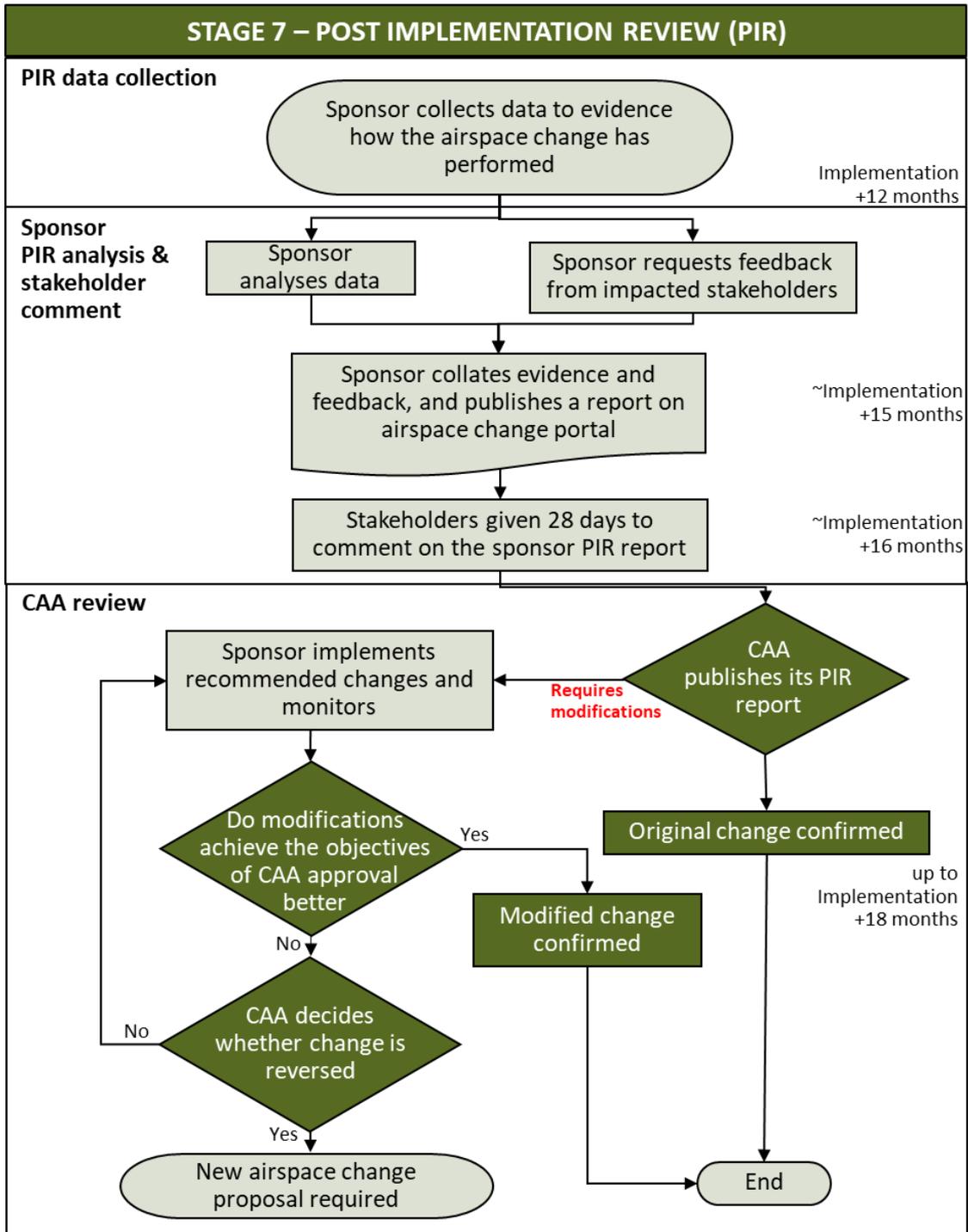
- aeronautical data verification completed and returned to the change sponsor, or submitted directly to the UK Aeronautical Information Service where relevant (CAA)
- approval of aeronautical information publication change request authority (CAA)
- aeronautical information publication change request submitted to UK Aeronautical Information Service (change sponsor)
- aeronautical information publication updated and published (on implementation date) in accordance with AIRAC cycle (UK Aeronautical Information Service)
- publish and provide the change sponsor with the post implementation review data request form (if it is required; see Stage 7 for detail on the post implementation review) (CAA).

Chapter 8

Stage 7 – POST IMPLEMENTATION REVIEW

Process Overview

Figure 8 Stage 7 (post implementation review) process overview



Introduction

- 8.1 Having completed the 'implement' stage, the change sponsor moves on to the 'post implementation review' stage.
- 8.2 This is where the change sponsor analyses the data and feedback that they have gathered, before submitting a report and publishing it on the airspace change portal. The CAA will seek feedback from stakeholders on whether the impacts of the airspace change are those expected. We will then assess the change sponsors data submission and review stakeholder feedback, before deciding on whether or not to confirm the airspace change.
- 8.3 Stage 7 is completed with the publication of the final outcome of the post implementation review on the airspace change portal.

Scaling of Stage 7

- 8.4 A post implementation review must be completed for all Level 1 airspace change proposals. It will only be completed for Level 2 and Level 3 airspace change proposal when the CAA determines that it is proportionate to do so.
- 8.5 Where a post implementation review is required, the CAA may proportionately reduce the extent of evidence and data required from the change sponsor. The CAA will provide the change sponsor with a 'data request form', clearly setting out the data that is required to enable the completion of the post implementation review and this will have been published on the airspace change portal during Stage 6.

Change Sponsor Evidence Collection and Analysis

The change sponsor **must** commence gathering data, including collating and responding to stakeholder feedback from the date of implementation

- 8.6 The change sponsor must begin monitoring and gathering data on the impacts of the airspace change as soon as it is implemented, and respond to stakeholder feedback received, keeping a record of any interactions. This includes the impacts on airspace users and those on the ground affected by aviation noise or other environmental factors.

The change sponsor **must** engage with the CAA throughout the first 12 months after implementation regarding issues with the airspace change that may affect the post implementation review, or any safety concern or emergent issue related to the implemented airspace design

- 8.7 Although the post implementation review usually takes place 12 months after the airspace change is implemented, the change sponsor must engage with the CAA if safety concerns or emergent issues relating to the airspace design arise, or

any other issues that may affect the post implementation review. The CAA may offer further guidance depending on the nature of the issue.

The change sponsor **must** provide a request to the CAA, with justification, if an extension to the data gathering period or the data analysis period are required

8.8 If the change sponsor requires an extension to the data gathering period, then it should contact the CAA stating the length of the requested extension and the justification. We will consider requests for a longer period on a case by case basis.

The change sponsor **must** produce a submission and publish this on the airspace change portal, within the agreed timescales

8.9 The CAA may include requirements that the change sponsor must complete for the post implementation review in the decision document or otherwise we will write to the change sponsor, during Stage 6, using the post implementation review data request form, informing them of:

- the precise data, operational information and other evidence that they must collect during the 12 months from implementation in preparation for the post implementation review
- the format in which this information is required
- how the impacts are to be measured
- when to submit this information to the CAA (this will usually be up to three months after the end of the 12-month evidence collection period).

8.10 If the post implementation review data request is utilised, it will have been published on the airspace change portal during Stage 6.

8.11 The assessment will also consider whether any assumptions in the original environmental assessment remain valid. All assumptions and estimates used in order to perform the initial assessment will therefore have to be reviewed by the change sponsor in the light of actual data since implementation.

8.12 The change sponsor must also ensure that it has collected the data it will need for proper comparison covering the period before implementation. Therefore, when using data samples to represent periods of operation, sample periods after implementation must be comparable with any sample periods used before the change.

8.13 The change sponsor must publish the data submission on the airspace change portal and provide a copy to the CAA for review.

Stakeholder Feedback

- 8.14 Once the change sponsor's data submission is published on the airspace change portal, the CAA will open a feedback window, during which any stakeholder can provide feedback about whether the impacts of the airspace change are those expected, 12 months on. Stakeholders should have no less than 28 days from publication of the complete data submission by the change sponsor to provide any feedback. The CAA can extend this period if it considers it proportionate to do, for example, if a review of the initial data set shows that further data is required, the feedback window may be extended to allow for responses to the new data.
- 8.15 Stakeholders will be able to submit feedback on the airspace change portal (or in an alternative format as agreed with us). Submissions are limited to one per individual (verified by email address). We give no assurance that we will take account of submissions made outside the feed-back window.

Engagement and Timelines

- 8.16 The CAA usually initiates the post implementation review 12 months after the airspace change is implemented, to ensure that a full cycle of winter and summer operations has been observed in all weather and air traffic conditions. However, if a change sponsor, or another stakeholder, makes a representation that a different period is needed to collect more representative data, the CAA will be prepared to consider an extension. This might be because, for example, the route that was the subject of the airspace change has been used only infrequently and an extended period would allow a better data sample with a wider range of weather conditions. The CAA may also initiate a review at any other time post implementation if it considers this is appropriate to do so. This can be a review of specific elements of the airspace change, not necessarily fulfilling the standard post implementation review requirements in time or scale.
- 8.17 The amount of time required by the CAA to review the evidence and publish its conclusions on the post implementation review will depend on the level and quality of data submitted by the change sponsor. While it may be possible for us to complete this work within three months of the change sponsor's data submission being published on the airspace change portal, we may need additional time for the following reasons:
- where there is a very high volume of stakeholder feedback to the published data
 - where the CAA's initial assessment of this data leads us to ask for additional data from the change sponsor

- where the outcome of the review is that design modifications are required, in which case the timescales could be extended significantly depending on the extent of any redesign.

Outcomes from the Post Implementation Review

- 8.18 The third element of the post implementation review involves the CAA review and assessment of the change sponsor's data submission and a confirmation as to whether, or not, the airspace change has satisfactorily met the intended objective(s), as approved.
- 8.19 The nature of each review is determined by the scale and impacts of the airspace change, and during the assessment phase, the CAA may decide to revise the scope and objectives of the review or to request more information.
- 8.20 The change sponsor may be required to undertake additional actions as a result of the post implementation review report. The CAA will publish the CAA post implementation review report on the airspace change portal and will confirm one of the following outcomes:
- the CAA may confirm that the implemented design satisfactorily achieves – within acceptable tolerance limits – the objective and terms of the CAA's approval, and the airspace change is confirmed. No further actions required by the change sponsor
 - the CAA may require modifications to better achieve the objective and terms of the CAA's approval; once the modifications have been implemented and operated for a period (approximately six months), there are three further possible outcomes:
 - noting that the modifications did not better achieve the objective and terms of the CAA's approval, the CAA may conclude that the original design was satisfactory and the original airspace change is confirmed. No further actions required by the change sponsor
 - noting that the modifications did not better achieve the objective and terms of the CAA's approval, the CAA may conclude that the original design was not satisfactory and the original airspace change is not confirmed. In this case, in order to pursue its airspace change, the change sponsor will need to commence a fresh airspace change proposal from Stage 1
 - the CAA may conclude that the modifications do better – within acceptable tolerance limits – achieve the objective and terms of the CAA's approval and so the modified design will be confirmed. No further actions required by the change sponsor

- the CAA may determine that the implemented design does not satisfactorily achieve the objective and terms of the CAA's approval, and modifications are not practicable. In any such case, the change sponsor may be required to revert to the previous airspace design.

- 8.21 Even when the airspace change has been found to have satisfactorily achieved the objective(s) expected within the tolerances proposed, it may be appropriate for the change sponsor to carry out further mitigations or engagement activity to address issues that have emerged during the course of the airspace change.
- 8.22 The CAA will set out any requirements it regards as warranted, with justification, in the post implementation review report.
- 8.23 Examples of the data the CAA may expect a change sponsor to collect are given below.

Potential post implementation review data requirements

Safety data – incidents related to the airspace design:

Data/information

- recurring instances of instrument flight procedures (initial approach procedures, standard instrument departures, standard instrument arrivals, holds) not being flown correctly to be notified to the appropriate CAA instrument flight procedures regulator who approved the procedure
- mandatory occurrence reports
- AIRPROX reports
- air safety reports.

Why it is needed

The change sponsor will need to provide data to enable an assessment whether that the new airspace design is at least as safe as the original design, if not safer (taking into account changes in traffic levels).

How it is assessed

The CAA will review the change sponsor's statistics concerning these events and assess whether the revised airspace design is a contributory factor in those incidents.

Service provision/resource issues:

Data/information

- data on refusals of service
- data on air traffic delays
- details of additional resource allocated, taking into account daily and seasonal flight behaviours/patterns.

Why it is needed

The change sponsor will need to demonstrate that adequate resources are in place to facilitate the operation of the new airspace design, and that air traffic services are being provided as forecast in the original proposal without unanticipated impact on other airspace users.

How it is assessed

The CAA will assess whether there is adequate resource in place to support the operation comparing the change sponsor's data with the approved proposal.

Utilisation of continuous climb operations and continuous descent operations**Data/Information**

- percentage achieving continuous climb operations and/or continuous descent operations, compared monthly before and after the change.

Why it is needed

Where the original change cited improvements in continuous climb operations/continuous descent operations utilisation, the change sponsor will need to provide data to demonstrate any subsequent improvement.

How it is assessed

The CAA will assess whether the anticipated benefit has been delivered comparing the change sponsor's data against the approved proposal.

Infringement statistics**Data/information**

- percentage change in infringements, compared monthly before and after the change.

Why it is needed

Where the revised airspace design changes the dimensions of controlled airspace, the change sponsor will need to provide an analysis of airspace infringements.

How it is assessed

The CAA will assess whether the airspace design was a contributory factor in any increase in infringements and if an infringement risk that was identified in the approved proposal has been mitigated.

Traffic figures (air transport movements)**Data/information**

(actual vs predicted figures)

- percentage change compared monthly before and after the change

- reconfirmation that there have been no factors that would cause a material change to the traffic forecasts provided in support of the original proposal, that is that the original forecasts are still reasonable.

Why it is needed

Traffic figures over the period will give a general overview of the nature of the operation following the implementation of the change. In addition, where the change was predicated on a forecast increase in traffic numbers, the change sponsor will need to confirm whether or not the increase in forecast in the approved proposal has been realised.

How it is assessed

The CAA will consider the extent of any difference between the predicted and actual traffic figures and the extent to which the impacts of the change can be explained by those differences.

Traffic dispersion comparisons

Data/information

- graphical representation (traffic density plots)
- lateral and vertical analysis.

Why it is needed

It is necessary to establish whether aircraft are flying to routes forecast in the approved proposal. A key part of the CAA's post-implementation review will be to analyse the 'before and after' dispersal of aircraft to understand whether the new airspace design is being operated as anticipated.

How it is assessed

The CAA will assess whether the dispersion of traffic is as anticipated in the approved proposal.

Operational feedback:

Data/information

- air safety reports
- direct feedback from airlines
- relevant flight operation sub-committee (sub-group of airport consultative committee).

Why it is needed

The change sponsor will have to present any feedback directly received by aviation stakeholders operating in, or affected by, the revised airspace design.

How it is assessed

The CAA will assess whether there have been any unforeseen or unintended operational impacts of the proposal.

Denied access statistics

Data/information

- refusals of access (month on month/before and after the change)
- reasons for individual refusals of access.

Why it is needed

This links to service provision/resources mentioned above. The change sponsor provides data on refusals of access to the revised airspace design and any underlying factors.

How it is assessed

The CAA will assess whether other airspace users are being impacted other than as anticipated as a result of the change. The CAA will analyse the reasons for any refusals.

Utilisation of standard instrument departures/standard instrument arrivals/instrument flight procedures

Data/Information

- percentage of flights achieving track keeping, compared month on month before and after the change.

Why it is needed

Information concerning the utilisation of the various procedures implemented as part of the change. The information may highlight areas of unforeseen consequence, for example where a particular procedure is being used more than anticipated with a subsequent impact.

How it is assessed

The CAA will assess whether the utilisation data is other than expected.

Letters of agreement

Data/information

- operational agreements between air navigation service providers and airspace users
- data on activation/utilisation of letter of agreement procedures.

Why it is needed

Where a letter of agreement detailing specific procedures was a specific condition of the CAA approval, the change sponsor will need to evidence the level of use of that agreement.

How it is assessed

The CAA will assess whether any letters of agreement have had the anticipated effect of mitigating the impact of the change on stakeholder activities.

Impact on environmental factors

Data/information

In general, change sponsors will undertake a re-assessment of the impacts that formed part of the original proposal. Depending on the level and scale of the proposal, that may include:

- re-assessment of noise impacts, taking account of actual flight behaviours/patterns and traffic volumes
- re-assessment of greenhouse gas emissions, taking account of actual flight behaviours/patterns and traffic volumes.

Why it is needed

The change sponsor will have to either:

- confirm that the impacts are as anticipated and presented in the approved airspace change proposal (together with any necessary supporting evidence); or
- present a re-assessment of the impacts presented in the airspace change proposal using actual data to update the results.

How it is assessed

The CAA will review and assess the change sponsor's analysis and determine the extent to which the CAA agrees.

International obligations – impact

Data/information

- details on any feedback from operators or neighbouring states.

Why it is needed

The change sponsor will need to:

- demonstrate that any international obligations identified at the time of the change have been discharged.

How it is assessed

The CAA assesses whether the obligations have been met.

Impact on Ministry of Defence operations

Data/information

- details on any feedback from the Ministry of Defence.

Why it is needed

The change sponsor will need to demonstrate that there has been no unforeseen impact on Ministry of Defence operations.

How it is assessed

The CAA assesses whether there has been any unforeseen impact on the Ministry of Defence that would need rectifying.

Stakeholder feedback**Data/information** (in the format specified by the CAA)

- feedback/complaints received by the change sponsor and CAA in the period between implementation and postimplementation review.
- details of location of complaints.

Why it is needed

Feedback is needed to identify any issues from a community perspective that were not anticipated as part of the approved proposal; monthly data over the course of a year is needed so that seasonal traffic changes are taken into account.

How it is assessed

An assessment is made to identify any unforeseen or unintended impacts of the proposal.

Outputs Required During Stage 7

Output from Stage 7 (by whom produced and published - in brackets)

- data submission for review (change sponsor)
- CAA post implementation review report, including confirmation of whether original change is confirmed or requires modification (CAA).

APPENDIX A

Final Airspace Change Proposal – Template

Preliminary Information

Airspace Change Reference

Drafting note – Provide the airspace change proposal title and unique identification as presented on the airspace change portal.

Authorship and Revision History

Drafting note – Provide a clear and transparent indication of any updates to the submission and to maintain version control of the document(s). The first submitted version of the document(s) should normally be annotated as version 1; where updates are required after publication, the version number should be updated accordingly, with a summary provided of what changes have been made, why they have been made, and where those changes can be found within document(s).

Contents

Drafting note – List of the section headings and should ideally include hyperlinks.

Introduction

Drafting note – Provide a brief introduction to the document, including who the change sponsor is and the purpose of the document.

Executive Summary

The Drivers for Change

Drafting note – Describe why there is a need for change. Outline any regulatory, policy, operational or other matters that make it clear as to why the change sponsor has determined that a change to the airspace structure, and/or the operation of the airspace, is required.

Statement of Need

Drafting note – Provide the latest version of the statement of need as presented on the airspace change portal.

If not already specified in the statement of need, the change sponsor must state here whether the final airspace change proposal forms part of the plan for delivering the airspace modernisation strategy, and, if not, confirmation that it is not inconsistent with the strategy.

Aims of the Proposal

Drafting note – Provide the high-level aims, objectives, and requirements for the proposal, including a statement as to whether they will be achieved, in full or with any compromises, through the implementation of the final design option. It may be useful to reference within this section the anticipated performance against relevant design principles to show how the change sponsor has determined that the aims, objectives, and requirements will be met.

Assumptions and Constraints

Drafting note – Provide a concise description of any high-level assumptions and constraints (external and/or those derived by the change sponsor) that were identified at the beginning of the proposal, or have developed throughout the process.

Summary Description of the Current Airspace and Operation

Drafting note – Provide a clear non-technical summary of the current airspace, its operation, and how it is utilised, using diagrams where appropriate. Examples of aspects to consider include:

- *controlled airspace*
- *special use airspace*
- *air traffic service routes*
- *instrument flight procedures*
- *navigation aids and waypoints*
- *airspace usage*
- *Navigation specification*
- *provision of air traffic services*
- *operational efficiency, complexity, delays and choke points*
- *flight planning and air traffic flow and capacity management*
- *airspace management*
- *safety*

Summary Description of the Changes to Airspace Design and Operation

Drafting note – Provide a clear non-technical description of all aspects of the airspace design and operation that will be modified or affected by this change, using diagrams where appropriate. The intent of this section should be for the main elements of the change to be understood by all readers, including those from a non-aviation background, without needing to consider any technical information.

Summary of Options Analysis

Drafting note – Provide a concise non-technical summary of the options appraisal process undertaken, describing the options considered, the analysis of those options, and why the final design option was selected.

Summary of Engagement and Consultation

Drafting note – Provide a concise non-technical summary of the engagement and consultation activities undertaken throughout the development of the final design option, indicating what has influenced the outcome, and outlining changes that have been introduced because of feedback from the consultation. This section should include the rationale for why the change sponsor considers that any modifications to the final design option do not require re-consultation.

Summary of Anticipated Impacts

Drafting note – Provide a concise non-technical summary of the anticipated impacts of the changes, including:

- *a description of the impacts, such as on airspace users, service providers, etc.*
- *the impact on safety (relating to section 70(1) of the Transport Act 2000 and the airspace modernisation strategic objective on safety)*
- *the impact on the efficient use of airspace (see section 70(2)(a) of the Transport Act 2000 and the airspace modernisation strategic objective on simplification)*
- *the impact on the expeditious flow of air traffic (see section 70(2)(a) of the Transport Act 2000 and the airspace modernisation strategic objective on simplification)*
- *the impact on the requirements of operators and owners of all classes of aircraft (see section 70(2)(b) of the Transport Act 2000 and the airspace modernisation strategic objectives on simplification and integration)*
- *the impact on the interests of any person (other than an operator or owner of an aircraft) in relation to the use of the airspace (see section 70(2)(c) of the Transport Act 2000 and the airspace modernisation strategic objective on sustainability)*
- *the impact on any matters relating to spaceflight activities (within the meaning of the Space Industry Act 2018) given to the CAA by the Secretary of State (see section 70(2)(ca) of the Transport Act 2000 and the airspace modernisation strategic objective on integration)*
- *the environmental impacts (see section 70(2)(d) of the Transport Act 2000 and the airspace modernisation strategic objective on sustainability)*

- *the impact on the air traffic services provided by or on behalf of the Ministry of Defence and other air traffic services units affected by the changes (see section 70(2)(e) of the Transport Act 2000 and the airspace modernisation strategic objectives on simplification and integration)*
- *the impact on national security (see section 70(2)(f) of the Transport Act 2000)*
- *the impact on any international obligations of the UK notified to the CAA by the Secretary of State and subsequently notified to the change sponsor (see section 70(2)(g) of the Transport Act 2000).*

Assessment of criteria for the Secretary of State for Transport's Call-in Process

Drafting note – While the call-in process is a consideration for Stage 5, there is a need for the change sponsor to assess whether the anticipated noise impacts meet one of the relevant call-in criteria set out in the Air Navigation Directions 2017. Provide a summary statement describing that assessment in this section (see the Stage 5 guidance for further information on the call-in process criteria).

Timeline for implementation

Drafting note – Notwithstanding that a full implementation plan is required in Stage 6, provide a statement outlining the main activities to be completed prior to implementation, along with an indicative timeline. While the target AIRAC number and implementation date must be included, along with the UK aeronautical information service cut-off date, other identified 'next steps' should be included as necessary, such as:

- *final airspace validation/simulation exercises*
- *staff training*
- *notification of changes to CAA Aerodromes and Air Traffic Management*
- *completion of modifications to infrastructure, including air traffic control displays, and/or related licensing*
- *completion and sign-off on letters of agreement.*

Detailed Description of the Proposal and Impacts

Drafting note – This section can be used to expand on the information provided in the executive summary. While needing to be detailed, the aim should still be for non-aviation stakeholders to understand the main aspects of the current airspace design. However, technical aspects are also important to some stakeholders, so additional information is likely to be required and the change sponsor may wish to use supplementary documents. Instrument flight procedure materials produced by the approved procedure design organisation, including charts, are not to be replicated as part of the final airspace change proposal documentation.

Detailed Description of the Current Airspace and Operations

Drafting note – A full description of the current airspace and usage that expands on the information provided in the executive summary, utilising diagrams where appropriate and showing the current design of the airspace and how it is utilised.

Detailed Description of the Changes to Airspace Design and Operation

Drafting note – A full description of the proposed changes to airspace design and operation that expands on the information provided in the executive summary, with the inclusion of those elements below where relevant:

- *new or modified airspace structures; for example, controlled airspace, air traffic service routes, special use airspace, instrument flight procedures, waypoints etc. and how they will interact with other existing airspace structures*
- *the hours of operation of airspace structures and any seasonal variations, including aspects relating to airspace management*
- *descriptions of instrument flight procedures, matching or taken from the instrument procedure design technical report, including relevant details on what has influenced the final design option*
- *supporting information on traffic data including statistics and forecasts for the various categories of aircraft movements (passenger, freight, test and training, aero club, other) and terminal passenger numbers*
- *details of the purpose of new, or modified, draft letters of agreement, including any that have developed out of consultation and/or from airspace management requirements*
- *evidence that the airspace design is compliant with International Civil Aviation Organisation standards and recommended practices and other applicable UK policies, or sufficient information for the CAA to consider any applications for dispensation*
- *high-quality diagram(s) of the airspace change in its entirety as well as supplementary diagrams illustrating different parts of the change as necessary. These diagrams must, as a minimum, show the extent of the airspace change in relation to known geographical features and centres of population.*

Detailed Description of Anticipated Operational Impacts

Drafting note – A full description of the anticipated impacts of the change on all airspace users, aerodromes, service providers, and traffic levels that expands on the information provided in the executive summary. Where appropriate this should include an outline concept of operations describing how operations associated with the new design will be managed. Consideration should be given to:

- *the impact on the flow of instrument flight rules flights, including general air traffic and operational air traffic*
- *the impact on visual flight rules operations*
- *the impact on existing procedures and airspace/airport capacity*
- *the impact on aerodromes and other aviation activities within or adjacent to the area of the proposed changes*
- *any flight planning or navigation requirements*
- *details of any changes to the provision of air traffic services, including justification for any delegation of the provision of air traffic services*
- *the impact of the traffic mix on complexity and workload of operations*
- *consideration of access requirements of other airspace users in accordance with the type and classification of airspace structure, including details on the ability to support the provision of air traffic services in accordance with the nature of the operation and the classification of airspace*
- *consideration of how connectivity to/from the air traffic service network is to be achieved, including arrangements for aerodromes outside controlled airspace.*

Supporting Infrastructure and Resilience

Drafting note – A full description of the anticipated impacts of the change on supporting infrastructure and resilience, with details of analysis undertaken against associated regulations, policies, and guidance. Consideration should be given to:

- *matters relating to communication equipment and services, including operational coverage of frequencies and contingency procedures*
- *matters relating to conventional navigation equipment and services, including navigation specifications and contingency procedures*
- *matters relating to satellite-based navigation equipment and services, including navigation specifications and contingency procedures*
- *matters relating to surveillance equipment and services and associated display equipment, including electronic conspicuity, contingency procedures.*

Regulations, Policies and Harmonisation

Drafting note – A full description of analysis conducted against relevant regulations, policies and guidance material relating to the establishment, publication, use, and management of airspace and airspace structures. This should include requests for dispensations to CAA airspace policies, along with supporting arguments and evidence. Any matters relating to CAA oversight outwith the airspace change process, such as those associated with change management where CAA Aerodromes and Air Traffic

Management has oversight responsibilities, must be discussed with the appropriate CAA department prior to the submission of the airspace change proposal. Examples of relevant materials can be found in the CAP 1616, Main Process Document Bibliography.

Safety

Drafting note – A full description of the anticipated impacts of the change on safety, related safety assessment work (for example HazID report, airspace safety review and validation simulation reports) and proposed mitigations to support the safe implementation of the change (if approved). This section should be used to set out the ‘Safety Case’ which demonstrates to the CAA how the proposal maintains a high standard of safety, while seeking to enhance current levels of safety. Change sponsors are encouraged to consider the contents of CAA guidance related to the development of a Safety Case (for example [CAP 722a, Unmanned Aircraft System Operations in UK Airspace – Operating Safety Cases](#), and [CAP 760, Guidance on the Conduct of Hazard Identification, Risk Assessment and the Production of Safety Cases](#)) and should liaise with relevant CAA subject matter experts to seek further clarification on the level of detail to be provided in this section.

Environmental Assessment

Drafting note – A full description of the anticipated impacts of the change on all environmental metrics required including:

Baseline scenarios and traffic forecasts

- *year 1 and year 10 for the baseline scenarios and final design option.*

Noise

- *noise exposure contours above 51 dB $L_{Aeq, 16h}$ daytime and 45 dB $L_{Aeq, 8h}$ night-time and evaluated by Department for Transport’s transport analysis guidance (TAG) for impacts on health and quality of life*
- *number above contours: N65 for daytime and N60 for night-time noise*
- *overflight contours*
- *operational diagrams*
- *other noise metrics where relevant*
- *assessment of whether the anticipated noise impacts meet the criteria for a proposal to be called-in by the Secretary of State (paragraph 7(c) of Direction 6 of the Air Navigation Directions 2023).*

Greenhouse gas emissions

- *annual CO_{2e} totals and evaluated by Department for Transport’s transport analysis guidance (TAG).*

Local air quality

- *explicit consideration of, and evaluated by Department for transport analysis guidance (TAG) where necessary.*

Tranquillity

- *explicit consideration of impacts on National Parks, Areas of Outstanding Natural Beauty (AONB), National Scenic areas (NSA), designated Quiet Areas and any other locally identified tranquillity areas using overflight contours or operational diagrams.*

Biodiversity

- *explicit consideration of impacts on European sites and other locally identified biodiversity areas using overflight contours or operational diagrams.*
- *assessment under habitats regulations assessment requirements as specified by the CAA.*

Final Options Appraisal

Drafting note - A full assessment of the economic impact of the final design option compared to the baseline scenarios. It should consider any revised impacts due to the updated final design option and/or changes in data using the same approach as in earlier stages. This should include:

- *A description of the final design option, including details on how it may have been modified post consultation and why.*
- *An explanation of the criteria and methodology adopted to assess the impacts of the airspace change proposal and how consistency between the initial, full and final options appraisals has been ensured.*
- *A description of the data sources, reference materials and assumptions used for the final options appraisal.*
- *Qualitative assessment of the impacts of the final design option for all relevant metrics as listed in Chapter 4 (Stage 2 – DEVELOP and ASSESS).*
- *Quantified and monetised assessment of the impacts of the final design option for all relevant metrics as listed in Chapter 4 (Stage 2 – DEVELOP and ASSESS).*
- *A cost benefit analysis of the airspace change proposal.*
- *An annex containing outputs from any calculations conducted as part of the cost benefit analysis, such as TAG workbooks, with the full workbooks being included as supplementary documents.*

List of Supplementary Documents

Drafting note – Provide a list of supplementary information that is contained in annexes and/or appendices along with a brief description of their contents. Examples of required information include:

- *TAG workbooks*
- *aeronautical data spreadsheet*
- *comprehensive documentation of all other required changes to aeronautical information publication and charts*
- *supporting data*
- *supporting evidence*
- *technical information*
- *draft letters of agreement*
- *instrument flight procedures package (submitted via the change sponsor's approved procedure design Organisation).*

Summary

Drafting note – The change sponsor's closing statement(s) if required.

APPENDIX B

Consultation Strategy - Template

Note to Sponsors: Particular regard should be given to the guidance in this document prior to completing the strategy. References made within this strategy to consultation can be read as also referring to engagement where that is being progressed.

Introduction

Drafting note - This section should be used to 'set the scene' by detailing the purpose of this document (to detail the strategy to be used to facilitate an effective airspace change consultation) and to provide some context/background information in relation to the proposed change.

Objectives

Drafting note - This section should be used to document some high-level objectives that will underpin the development of this consultation strategy.

Summary of Engagement Activity Undertaken to Date

Drafting note - This section should be used to provide a summary of the engagement activity completed during Stages 1 and 2. Change sponsors should also detail what engagement activity (if any) has been completed to specifically support the development of the consultation strategy.

Audience

Drafting note - This section should detail which stakeholders are likely to be affected (positively or negatively) by what is being proposed and those who are interested in the proposal. It should also explain what their information needs are and should (where appropriate) consider any seldom-heard audiences.

Approach

Drafting note - This section should detail how the change sponsor will inform audiences of the consultation and what opportunities they (including those with no internet access) will have to engage/respond (channels used). It should also include a timetable of associated consultation activities (for example, drop-in sessions/roadshows).

This section should also detail how the change sponsor will respond to unexpected events and challenges (for example, what their contingency plans are) and what steps will be taken to generate an appropriate level of participation, minimise the chances of the consultation strategy failing and their intentions if the strategy does fall short of expectations.

Materials

Drafting note - This section should detail how the change sponsor intends to provide stakeholders with appropriate information to ensure that they understand the issues and the potential impacts of the proposal on them to ensure that they are able to give informed responses.

It should also set out how the supporting materials will be developed to suit a range of audiences, such as how technical information will be communicated in an accessible way.

Length

Drafting note - This section should detail the start/end dates of the consultation and confirm its length. It should also be used by the change sponsor to present their case/rationale (where appropriate) for pursuing a shorter or longer consultation period than the recommended 12 weeks.

Post-Consultation

Drafting note - This section should summarise next steps.