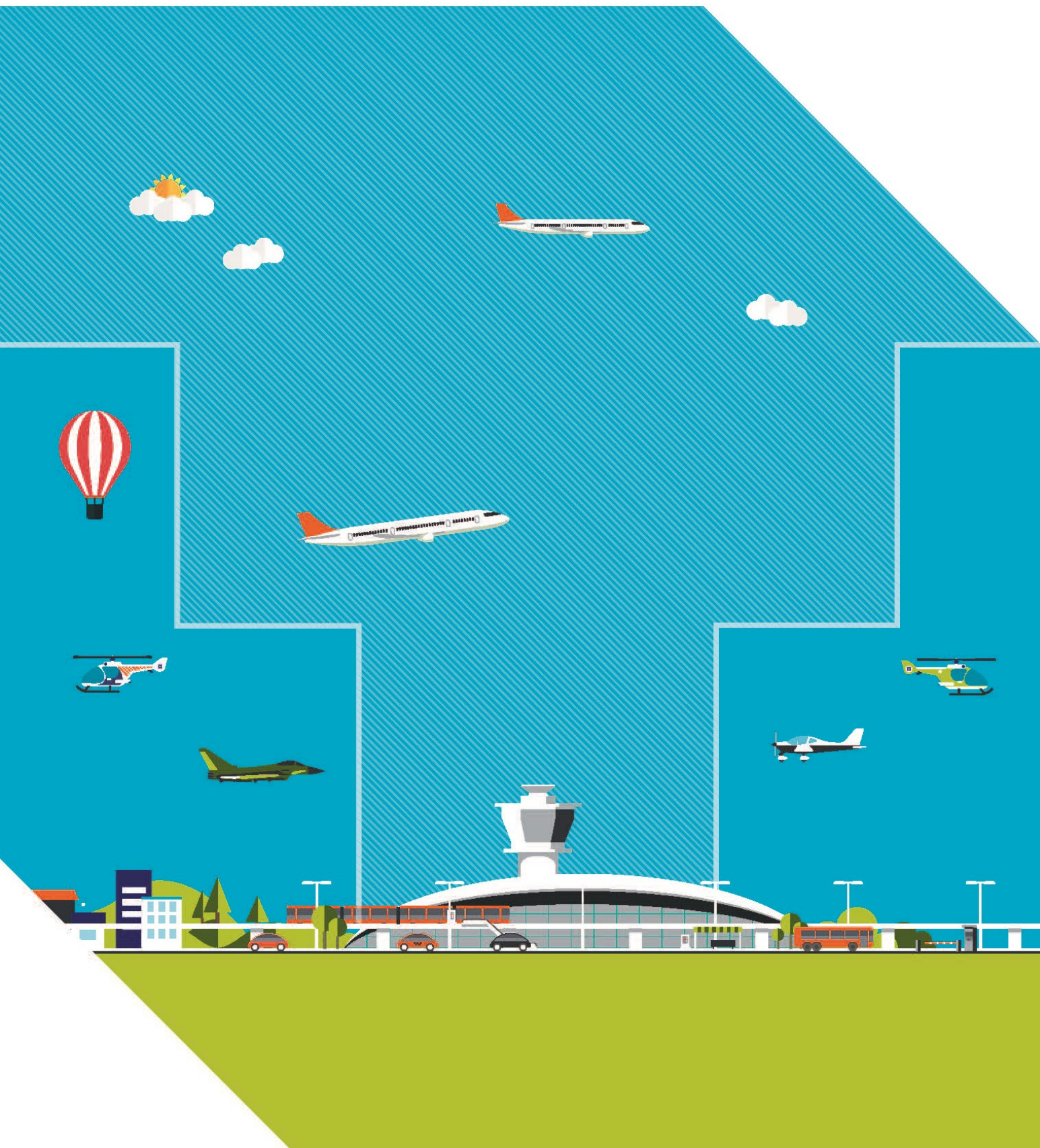


Outcome of the consultation on the Airspace Classification Review 2019/20

CAP 1935



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Chapter 1

The consultation

Purpose of this document

- 1.1 In December 2019, the CAA launched a consultation asking you to help us identify volumes of controlled airspace in which the classification could be amended to better reflect the needs of all airspace users on an equitable basis.
- 1.2 This document outlines the content of the responses received and how the CAA plan to take these forward once the new procedure to review and amend airspace classifications has been developed and implemented at the end of 2020. This document is not seeking further views.

Background

- 1.3 In October 2019, the Secretary of State wrote to the CAA to amend the 2017 Air Navigation Directions. The Directions set the CAA's functions, meaning the role we must carry out with respect to airspace. Direction 3 states that the CAA must:
 - (a) develop and publish a national policy for the classification of UK airspace*
 - (b) classify UK airspace in accordance with such national policy, publish such classification, regularly consider whether such classification should be reviewed, carry out a review (which includes consultation with airspace users) where the CAA considers a change to classification might be made and, as the CAA considers appropriate, amend any classification in accordance with procedures developed and published by the CAA for making such amendments;*
 - (ba) in developing the national policy referred to in sub-paragraph (a), classifying UK airspace under sub-paragraph (b), or amending the classification of a volume of airspace under that sub-paragraph, seek to ensure that the amount of controlled airspace is the minimum required to maintain a high standard of air safety and, subject to overriding national security or defence requirements, that the needs of all airspace users is reflected on an equitable basis;*
- 1.4 This means the CAA must:
 - regularly consider whether to review the current classifications of airspace
 - consult airspace users as part of that review
 - where we consider a change to classification might be made, amend it ourselves in accordance with a new process that we must develop and publish

- in developing that procedure and our policy describing airspace classifications, seek to ensure that the amount of controlled airspace is the minimum required to maintain a high standard of air safety and, subject to overriding national security or defence requirements, that the needs of all airspace users are reflected on an equitable basis.

- 1.5 In response to this, the CAA decided to initiate a review of the classification of UK airspace in December 2019, in parallel with developing the new procedure. Taking into consideration the obligation to consult with airspace users before carrying out the review, this consultation sought to engage stakeholders by inviting them to each identify up to two volumes of airspace where amendments to current structures and access arrangements should be considered. Stakeholders were asked to identify the location of the opportunities as well as the flight level, and time of the day and year when the classifications could be amended. We asked respondents to provide a rationale and supporting evidence for their suggestions.
- 1.6 To support this request, the CAA published a number of visualisations of controlled airspace. These were ordered by geographical area of the UK (North, Central and South) and then by height (presented as four flight levels) and at representative times of the day.
- 1.7 Directions 3(a), (b) and (ba), mentioned in paragraph 1.3 above require the CAA to have a procedure for amending airspace classifications. That procedure is currently being developed, and is now undergoing a public consultation.¹ This means that the next steps the CAA takes on the volumes of airspace identified by respondents to our first review will be determined by the new procedure. The new procedure must be in place by 1 December 2020.

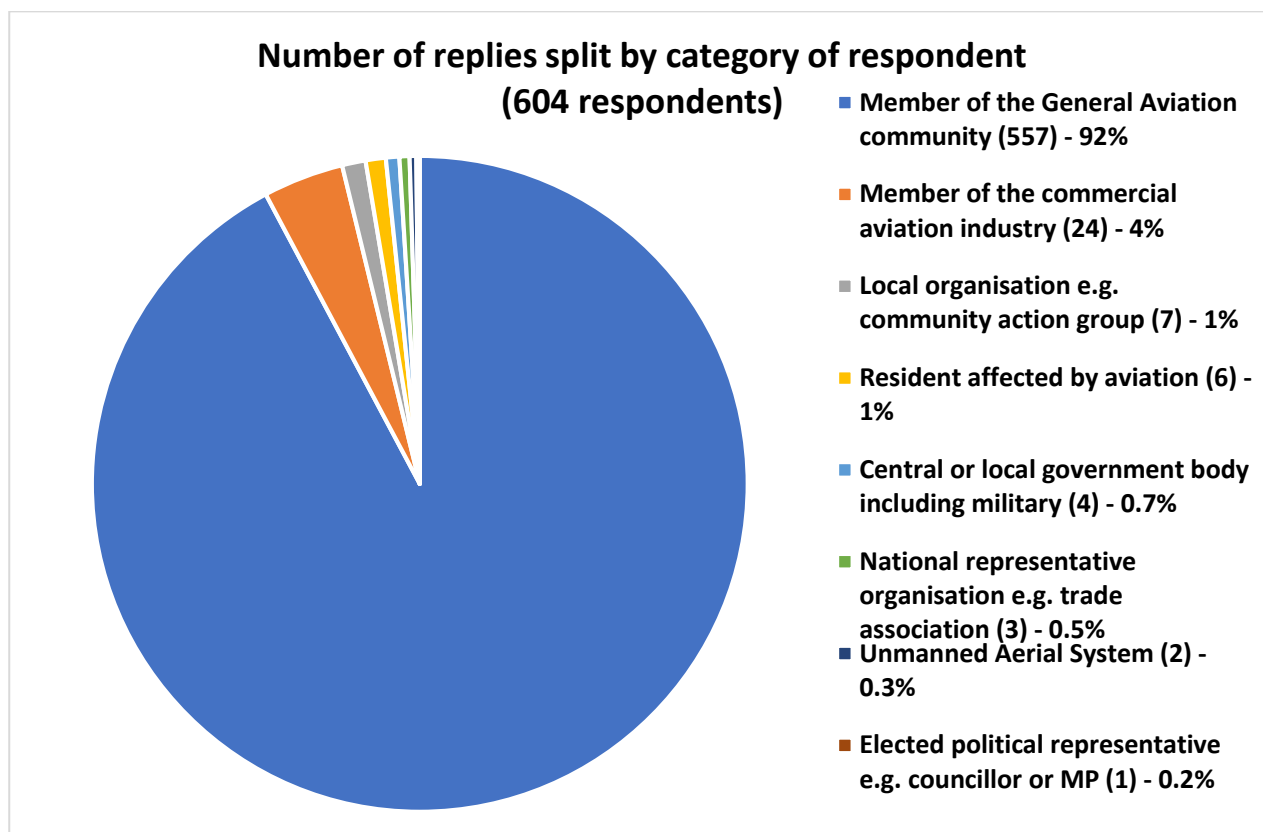
Who responded to this consultation

- 1.8 We had 604 responses in total, after removing duplications. Three respondents submitted more than one identical response, meaning there were 607 respondent entries. For the purposes of the analysis we have disregarded the second response, making the total received 604.
- 1.9 We asked respondents to categorise themselves into one of the following nine categories:
- Resident affected by aviation
 - Airline passenger

¹ <https://consultations.caa.co.uk/policy-development/draft-procedure-to-review-airspace-classification>

- Member of the General Aviation community, broken down further by:
 - Balloon
 - Fixed Wing 0-2 Tonne MTOW
 - Fixed Wing 2+ Tonne MTOW
 - Glider
 - Hang Gliding and Paragliding
 - Helicopter
 - Microlight
 - Model aircraft
 - Other. Please specify (free text box)
- Unmanned Aerial System Operator
- Member of the commercial aviation industry, broken down further by:
 - Airline
 - Airport
 - Air Navigation Service Provider
 - Business Aviation
 - Other. Please specify (free text box)
- Central or local government body including military
- Elected political representative e.g. councillor or MP
- National representative organisation e.g. trade association
- Local organisation e.g. community action group.

Figure 1.1 responses to the consultation by category of respondent



1.10 Of the 604 respondents

- 557 responses were from members of the General Aviation category
- 24 responses were from the commercial aviation industry of which 17 were from air navigation service providers and seven were from airports
- Seven responses were from local organisations/action groups.
- Six responses were from residents affected by aviation
- Four responses were from central or local government body including military
- Three responses were from a national representative organisation e.g. trade association
- Two responses were from Unmanned Aerial Systems Operators
- One response was from an elected political representative e.g. councillor or MP

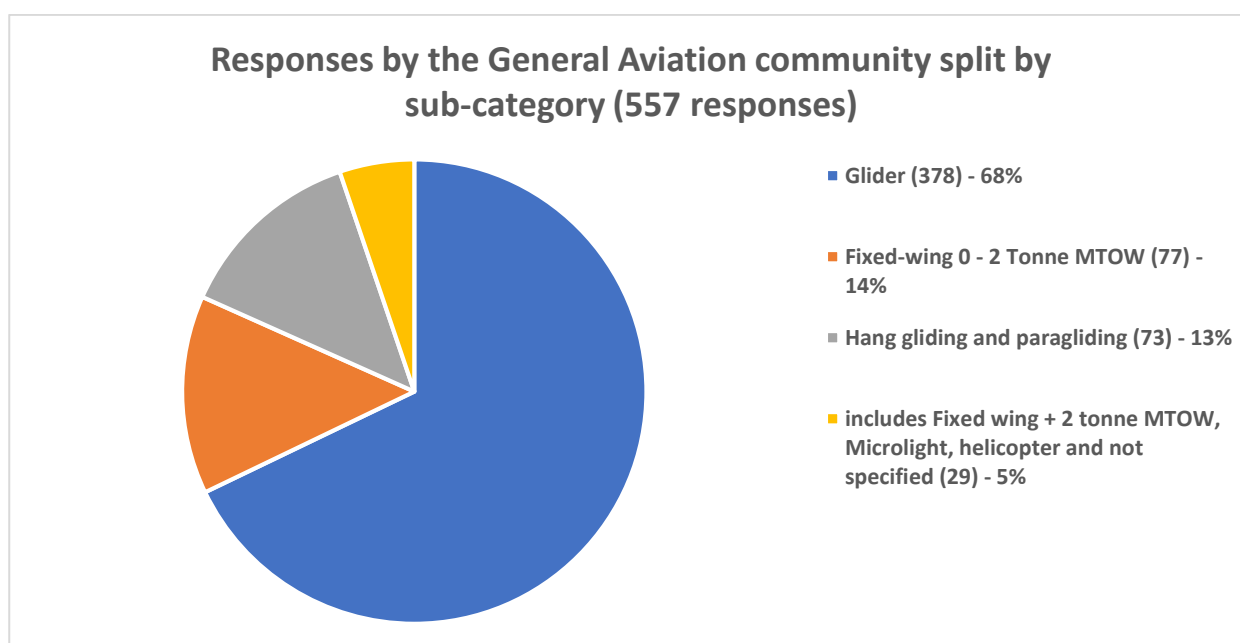
1.11 Several respondents identified themselves as answering on behalf of a non-general aviation category and then added a general aviation sub-category to reflect their personal flying activities. These included one representative from the central or local government body category, one elected political representative, four local organisations, three members of the commercial aviation industry, one

national representative organisation and one resident affected by aviation. In all these cases, we respected the main category that respondents had selected and excluded their data from the general aviation analysis.

1.12 There were two instances where respondents identified themselves as belonging to a local organisation e.g. community action group, but then went on to declare that they were not responding on behalf of that group. As in both these cases a general aviation sub group had been added, we have recategorised the responses to the general aviation category.

1.13 We had no responses in the airline passenger category.

Figure 1.2 responses from the General Aviation community split by sub category



1.14 The 557 responses from the general aviation community were broken down into sub categories as follows:

- 378 (68%) glider
- 77 (14%) fixed wing 0-2 tonne MTOW
- 73 (13%) hang gliding and paragliding
- 29 (5%) was made up of the remainder i.e. fixed wing 2+ tonne MTOW, microlight, helicopter and those where the sub category field was not completed.

1.15 No responses were received from model aircraft or other sub categories

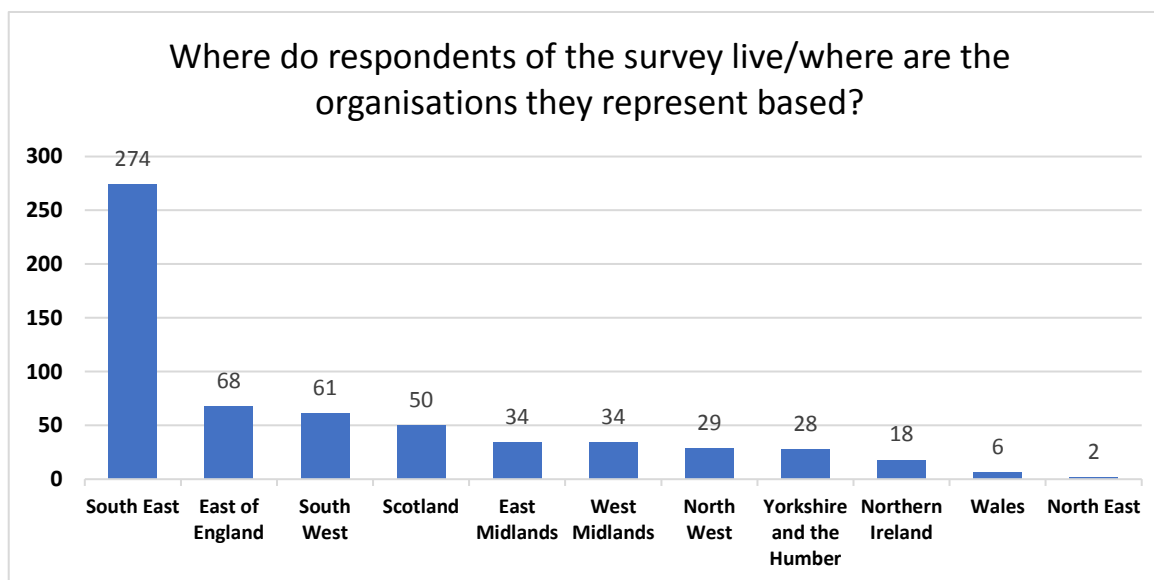
1.16 A full list of respondents appears at the end of this chapter

Geographic spread of responses

1.17 The 604 respondents identified themselves as living, or responding on behalf of an organisation based in the following areas:

- South East (274)
- East of England (68)
- South West (61)
- Scotland (50)
- East Midlands (34)
- West Midlands (34)
- North West (29)
- Yorkshire and Humber (28)
- Northern Ireland (18)
- Wales (6)
- North East (2)

Figure 1.3 category of respondent by geographic region



Engagement regarding the consultation

1.18 To encourage a wide engagement in this initial review, on the day of launching the consultation the CAA contacted approximately 730 individuals and

organisations through a direct email and a further 13,000 through the CAA's Skywise platform. These communications advised that the Airspace Classification Review consultation had gone live, provided a link to the consultation and requested that all representative groups forward a copy to their members. Presentations were also given at meetings with the Industry Communications for the Airspace Modernisation Strategy group and the CAA's Unmanned Aerial System Forum. A reminder email was sent to all original recipients two weeks before the end of the 11-week consultation period, reminding stakeholders that the consultation would close on 3 March 2020.

1.19 Four stakeholder engagement events were held in January 2020. The first of these was in the form of an open information session, to which we invited all organisations listed in the CAA's Airspace Modernisation Governance Structure². To further fulfil the requirement for consultations with airspace users, this was followed by three roundtable discussions, to which we invited relevant representative groups in the Governance Structure. Two of these roundtables focused on attendees from the general aviation community and one was focused on commercial aviation and the Ministry of Defence. The Department for Transport attended all the events. Representatives from the following organisations and groups attended the roundtable sessions:

- Airspace4All
- Airport Operators Association
- General and Business Aviation Strategic Forum
- General Aviation Partnership
- Gatwick Airport
- Heathrow Airport
- Manchester Airport Group
- Ministry of Defence
- NATS

1.20 These events allowed us to explain in more detail the background and purpose of the review and how we planned to carry out the work, as well as providing more information on the supporting evidence supplied and how it might be used to inform responses. Attendees were invited to engage in a focussed

² As set out in the Airspace Modernisation Strategy (CAP 1711) and in more detail in [The Airspace Modernisation Governance Structure \(CAP 1711b\)](#).

conversation on what they felt the review needed to achieve, what evidence we should use and provide thoughts on how we might work with them to help deliver their desired outcome.

- 1.21 More detail on feedback from the engagement sessions can be found in Chapter 3.

Our analysis of the responses

- 1.22 The consultation asked respondents to identify two volumes of airspace, described as opportunities, that they were familiar with and where amendments to current structures and access arrangements could be considered.
- 1.23 Six open (free text) questions were asked for each opportunity. These questions were used to capture details of the volume of airspace in question, including the location, relevant flight level (height) and time of day when the change could be implemented. Respondents were also asked to provide a rationale and upload any supporting evidence for each of their suggested opportunities. This gave respondents an opportunity to outline why they were suggested and the potential benefits or dis-benefits. We were also interested in whether any local arrangements were currently in place, such as a Letter of Agreement³.
- 1.24 A general comments box invited further views on the purpose of the review and the project in general.
- 1.25 As well as detail on the suggested opportunities, respondents were able to use the open questions to raise any suggestions or ideas they wanted us to consider. We applied a basic qualitative research approach to analysing those responses, to identify key themes raised by respondents, which category of respondent raised them, and how often. Chapter 3 details some of the most significant themes listed in the free text responses, including some examples, where permission has been given by respondents to do so.

³ A Letter of Agreement is a formal agreement between two parties describing operational scenarios, associated procedures, the operational responsibilities placed upon each party and emergency contact information.

List of those responding to the consultation by category of respondent

Resident affected by aviation (6)

- Six individuals

Member of the General Aviation community⁴ (557)

- Avon Hang Gliding and Paragliding Club
- Bath, Wilts and North Dorset Gliding Club
- Bognor Regis Gliding Club
- Bristol and Gloucestershire Gliding Club
- British Microlight Aircraft Association
- Burn Gliding Club
- Cairngorm Gliding Club
- Cambridge Gliding Club
- Derbyshire and Lancashire Gliding Club
- Dover and Folkestone Hang Gliding Club
- First Flight Paragliding School
- Herefordshire Gliding Club
- Isle of Wight Hang Gliding and Paragliding Club
- Kent Gliding Club
- Lasham Gliding Society
- Light Aircraft Association
- Mendip Gliding Club
- Midland Gliding Club
- Norfolk Hang Gliding and Paragliding Club
- Pennine Soaring Club
- Rattlesden Gliding Club

⁴ Six of the general aviation clubs and societies shown were represented by more than one respondent but for the purposes of this document they have only been listed once. It is recognised that the General Aviation clubs and societies listed here are responding on behalf of a large membership base.

- Saltersland
- Sky Surfing Club
- Southdown Gliding Club
- Southern Flyers (Sussex)
- Sportflight Scotland
- Staffordshire Gliding Club
- Stratford on Avon Gliding Club
- The Yorkshire, Derbyshire, Nottinghamshire and Lancashire Regional Soaring Airspace Group (East)
- The Yorkshire, Derbyshire, Nottinghamshire and Lancashire Regional Soaring Airspace Group (West)
- Ulster Hang Gliding and Paragliding Club
- Xclent Paragliding Club
- York Gliding Centre
- Yorkshire Gliding Club
- 499 individuals
- 18 clubs/groups who wished to remain anonymous

Unmanned aerial system (2)

- Two operators of unmanned aerial systems who wished to remain anonymous.

Member of the commercial aviation industry (24)

- BAE Systems Warton
- Birmingham Airport
- Birmingham Airport Air Traffic Limited
- NATS
- Heathrow Airport
- Norwich Airport
- SkyDemon
- Air Navigation Solutions

- Sixteen members of the commercial aviation industry that preferred to remain anonymous.

Central or local government body including military (4)

- Prestbury Parish Council
- Independent Commission on Civil Aviation Noise
- Two central or local government bodies that preferred not to be identified.

Elected political representative e.g. councillor or MP (1)

- One individual.

National representative organisation e.g. trade association (3)

- British Balloon and Airship Club
- British Gliding Association
- Prospect Air Traffic Controllers Branch.

Local organisation e.g. community action group (7)

- Edinburgh Airport Noise Advisory Board - OAG
- Nutfield Conservation Society
- Richmond Heathrow Campaign
- Four local organisations that preferred not to be identified.

Chapter 2

Outcome of the consultation

The opportunities

- 2.1 Respondents were asked to submit up to two opportunities each. With over 600 responses received, the CAA assessed over 1000 opportunities submitted through the consultation. These opportunities corresponded to 57 locations, which are listed and further described in paragraph 2.9 below. The opportunities have been summarised into ranges of airport/airspace location, showing the number of respondents listing one or more airport/airspace locations within that range.
- 2.2 Sometimes, respondents used other open (free text) consultation questions to list additional volumes. There were 110 instances where respondents included, sometimes numerous, additional opportunities in the general comments section of the consultation. The CAA read every response, but we have not been able to include the additional volumes suggested in this quantitative analysis.
- 2.3 The questions we asked were designed to help us identify a specific volume of airspace. We asked respondents to refer to the images published as part of the consultation, which showed radar data for airspace at various flight levels and various times of day. Respondents often used local methods or generalised locations to identify which volumes of airspace they highlighted for review, for example describing the airspace or place names on the ground. In the absence of this nomenclature in responses, we have had to undertake further research to assist in identifying the specific airspace proposed, including reviewing the qualitative descriptions and uploaded evidence in the responses.
- 2.4 The CAA therefore reviewed all the different suggestions, however they were named or described, and decided to identify the volumes with the specific airspace as promulgated in the UK Aeronautical Information Publication EN-Route Section 6.⁵ This was the best method to create a single list of airspace volumes with a common naming system and help identify duplications.
- 2.5 As described above, the CAA has conducted a high-level review to create a definitive list of opportunities as proposed by respondents. At this stage we have not attempted to draw up a plan for the volumes of airspace where we believe the classification could be amended and where we should consider the best options for such amendments. This initial consultation was the first step in creating a new long-term regulatory function for the CAA to undertake a regular

⁵ <http://www.nats-uk.ead-it.com/public/index.php.html>

review of airspace classifications and allow us to amend them where appropriate. Once the new procedure has been agreed and implemented, we will use that to review the potential opportunities and identify those where we think the classification could be amended.⁶

- 2.6 The new procedure is only in draft form at present. It outlines how we intend to use appropriate intelligence, including continuous monitoring of airspace safety, access or utilisation issues, to create a plan that lists the airspace volumes where the classification could be amended, and consult airspace users on the plan.
- 2.7 Some respondents asked how quickly changes can be made. This will depend on the procedure we put in place for amendment – which we are designing to be proportionate, but which must include certain activities such as writing a safety case and appropriate consultation – and the complexity of the individual airspace amendment. The cooperation of stakeholders such as the airspace controlling authority that operates a given volume of airspace will also play a part in the number of changes we might reasonably expect to make in a year.

List of opportunities suggested by respondents

- 2.8 The full set of airspace volumes suggested by respondents as candidates for a classification change is listed in the table below. As noted earlier in this report, the CAA is consulting on the procedure for amending airspace classifications. The draft procedure includes a list of criteria that we propose should be used to assist in filtering the airspace volumes suggested by stakeholders during the review stage of the procedure, to create a plan for volumes that the CAA believes could have potential for amendment. The criteria may change after the consultation once we have taken responses into account. They will therefore only be confirmed once the new procedure is in place for the 1 December 2020 implementation date. However, for illustrative purposes only, we have chosen three opportunities, submitted through the December 2019 consultation and conducted a short case study to show the likely effect of applying the proposed criteria in the draft procedure on which we are consulting. It should be noted that the volumes discussed in these case studies will be subject to a full and detailed analysis once the new procedure has been implemented. This could result in the volumes meeting one of the proposed filtering criteria, which could potentially change the likely outcome specified below.

⁶ Further information on the future procedure is available at <https://consultations.caa.co.uk/policy-development/draft-procedure-to-review-airspace-classification>

Table of volumes of airspace

2.9 The table below shows the range of volumes suggested by respondents for each airport/airspace location, together with the number of respondents that suggested one or more volume within that range.

Airport /airspace location	Volumes suggested by respondents	Number of respondents mentioning one or more volumes within that range	Commentary
Aberdeen	CTA/CTA 3	5	P600 and CTA received the highest number of mentions at 14 and 4 respectively.
	CTR	1	
	P600	14	
Belfast	TMA	1	
Belfast Aldergrove	CTR	1	TMA 1 received the highest number of mentions at 30
	TMA1/TMA 2	34	
Belfast City	CTA 3	1	
Benson	MATZ	2	
Biggin Hill	ATZ	1	
Birmingham	CTA	3	CTA 9 and CTA 3 received the highest number of mentions with 4 and 3 respectively
	CTA 3,4 5,8, 9, 10,18	8	
Birmingham and East Midlands	EGBB CTA 3 & 8, EGNX CTA 11, 12 & 13	2	
Boscombe Down	MATZ	2	
Boscombe Down & Middle Wallop	MATZ & Danger Areas	1	
Bristol	CTA 1, 3, 5, 6, 7 & 8	23	CTA 7,8 was the most popular combination with 13 mentions followed by CTA 8 with 5 mentions
	CTR	1	
	South West	1	
Bristol Area	R154 Oldbury	1	
	R155 Berkeley	1	
Bristol/Cardiff	CTA 6, 7, 8	2	
Brize Norton	CTR	46	
Cardiff	CTA 6 & 8	3	
	N864	1	
Cotswold CTA	CTA 3, 4, 13 & 14	1	
	CTA 5 & 6	1	
Danger Area	D006 - Falmouth Bay, D007 - Fowey	1	The most common combination was D123, 124, 125, 126, 127 - SPTA

Airport /airspace location	Volumes suggested by respondents	Number of respondents mentioning one or more volumes within that range	Commentary
	D123, Imber, 124, 125, 126, 127 - SPTA	18	with 16 mentions, followed by Porton Down with 6
	D127 - Porton Down	6	
	D129 Weston-on-the-Green	3	
	D130 - Longmoor	1	
	D147 - Pontrilas	4	
	D216 - Creden Hill	1	
Daventry CTA	All	1	The most common combination was CTA 1 & 7 with 10 mentions. CTA 9 proved the most common individual CTA with 17 mentions
	CTA 1, 2, 3, 4, 7, 8, 9, 10, 18, 20	44	
	CTA 4 & LTMA 19	1	
	Various	4	
	CTA 9 southern end	1	
Doncaster/Sheffield	CTA 1 - 13	50	The most common combination was CTA 5 ,6, 8, 9, 10 & 11, with 8 mentions. Of the individual CTAs, CTA 5 and 6 got the highest number of mentions with 18 and 19 respectively.
	CTR/CTA	45	
	Don/EMA Gap	1	
	CTR/CTA 5, 6, 8, 9, 10 & 11	2	
Durham Tees Valley	CTA 3	1	
	CTR/CTA	9	
East Midlands	CTA/CTA 11 & 12	2	
	South CTR	1	
Edinburgh	Arrival routes over Midlothian	1	
	CTA/CTA 1, 2, 3 & 4	6	
Fairford	MATZ	2	
Farnborough	CTA 1, 2,3, 5, 6,7, 8, 9,	18	CTR/CTA was the most common combination with 15 mentions. CTA8 proved the most common individual CTA with 11 mentions
	TMZ	2	
	Odiham MATZ	1	
	CTR/CTA	15	
Feshiebridge	N560	3	
Gatwick	CTR/CTA	3	

Airport /airspace location	Volumes suggested by respondents	Number of respondents mentioning one or more volumes within that range	Commentary
	General - VFR corridors	1	LTMA1 received the highest number of mentions at 5
	LTMA 1, 20	6	
	Routes 3 & 4	1	
Glasgow	CTA 1,3	3	CTR proved the most popular with 13 mentions
	CTR & Scottish TMA 5	15	
Heathrow	CTR/CTR - White Waltham ATZ/ LTMA	4	Of the LTMA's, LTMA 1 proved the most popular with 7 mentions
	LTMA 1, 3, 4, 11, 23	11	
Huddersfield Gap	ATS Route L975	1	
Inverness	Proposed CTR/CTAs	6	
Kemble	Parachute DZ near Western edge of Brize CTA	1	
Leeds Bradford	CTA joined with Manchester CTA	1	Most popular combination was CTA 3, MAN CTA 3, TMA 1 L975 mentioned 6 times. Looking at individual CTAs, CTA 3 proved the most popular with 13 mentions
	CTR/CTA 1, 3 & L975	10	
	CTA 3, Man CTA 3, TMA 1, L975	6	
Linton-on-Ouse	MATZ	1	
Liverpool	CTA 2 & 4, Holyhead CTA 2 & 17	1	
	North West Liverpool CTA-2 and CTA-4	1	
London FIR	Daventry CTA1, 7 & 10; Manchester CTA 3 & TMA1 EAST	1	
London TMA (LTMA)	LTMA/ LTMA 1 - 5, 8, 11, 13-14, 20-21, 23-24	254	Breaking down the LTMA's, LTMA 20, LTMA 4 and LTMA 3 proved the most popular with 97, 90 and 50 mentions respectively.

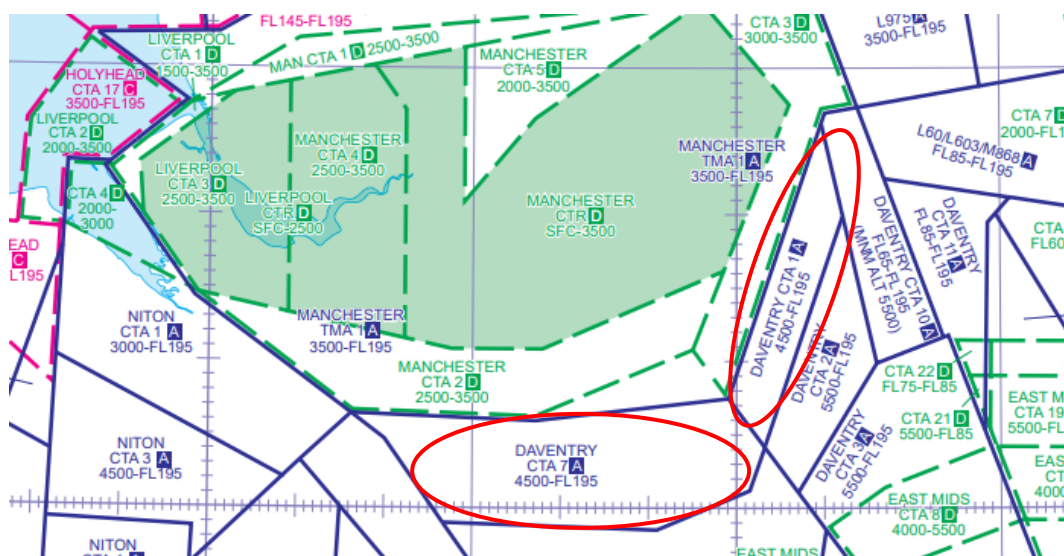
Airport /airspace location	Volumes suggested by respondents	Number of respondents mentioning one or more volumes within that range	Commentary
	LTMA 1 West, Near Rochester, LTMA 2, 3, 4, 7, Southend CTA4, Stansted CTA 3	8	
	LTMA 3 - Wycombe, Stansted, Southeast	42	
	Specific portions of LTMA 1 NW of KK, LTMA 3 East of KK, LTMA20 S of KK	2	
Luton	All	3	
	CTR/CTA 2, 4, 5	3	
Manchester	All	1	TMA1- SE Corner received the most mentions with 16
	CTR/CTA 1, 2, 3, L975,	10	
	LL Corridor	2	
	N57 FL55 segment North of Manchester	1	
	TMA 1 NW, NE, SE Corners	24	
Manchester/Leeds Bradford	L975-1, MAN CTA-3 & TMA-1 and LBA CTA-3	1	
Newcastle	CTA 2	1	
Niton CTA	CTA 3, 10, 11	3	
North Weald	Stansted TMZ	1	
Norwich	All/All CTR/CTA above 2000'	51	'All' areas attracted 50 mentions, followed by West CTA, which was mentioned 6 times
	CTR/CTA/CTA 1,	11	
	NW, West & SE CTA	7	
Portsmouth	CTA 5	1	

Airport /airspace location	Volumes suggested by respondents	Number of respondents mentioning one or more volumes within that range	Commentary
Prestwick	All	1	
Scottish FIR	N560	8	P600 was the most popular location with 12 mentions
	N601, N57,L612,T256 ATS Route complex	1	
	N864/N864 (North of EDI)	3	
	P600	12	
Scottish TMA	Scottish TMA, P600 and N864	1	TMA 3, 7 was the most popular combination 4 mentions. EDI/GLA Gap also received 4 mentions
	All	1	
	EDI/GLA Gap	4	
	Glasgow CTR, TMA7	2	
	TMA/TMA 2, 3, 7	6	
Solent	CTA 1, 2, 3, 4, 5, 6,	11	CTA 3, 5 was the most common combination with 8 mentions
	CTA All	1	
South Cerney DZ	All	22	
South Cerney, Keevil, SAS zone NW of Hereford & SAS Zone North of Abergavenny	All	1	
Southampton	All Airspace	1	
	CTR	1	
	Eastern area	1	
Southampton/Solent CTA	All Airspace	2	
Southend	CTA 7, 8	4	CTR/CTA was the most popular combination with 5 mentions
	CTR/CTA/CTR CTA Southern Tip	7	
Stansted	CTA North, CTA South, TMZ	2	
	CTR	1	
	TMZ between Stansted and Luton CTR's	1	
Stansted, Luton & Southend	All	1	

Airport /airspace location	Volumes suggested by respondents	Number of respondents mentioning one or more volumes within that range	Commentary
UK FIR	MATZ and ATZs	1	
	T256	1	
Wittering	MATZ	2	

Case Study One

- 2.10 This case study refers to the suggestion that the base of Daventry control areas CTA 1 and CTA 7, which currently have a base level of 4500 feet, should be raised to 5500 feet. The areas in question are highlighted in the chart below.

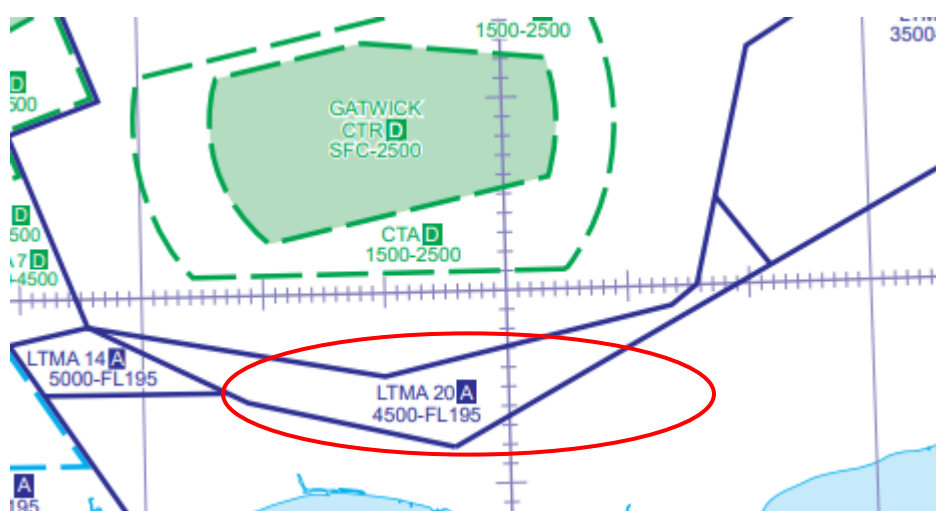


- 2.11 As the Daventry area is not directly subject to an ongoing or recent airspace change proposal, or likely to impact Ministry of Defence operations, the suggested volume may have the potential to be taken forward as part of our plan. We will need to carry out further analysis, which will include determining whether there are any significant safety, operational or environmental impacts from making such a change.
- 2.12 If, for example, we would need to make changes to departure and arrival routes at aerodromes, then we would not progress the proposal any further using the classification procedure. This is because such a proposal would constitute a significant change in airspace design, where the impacts must be thoroughly assessed through the more detailed CAP 1616 process. Instead we would request that the airspace controlling authority considers addressing the airspace issue through the existing airspace change, or through any future airspace

design change in the future. Alternatively, and where appropriate, we might discuss any other short-term solutions with them to enable better access to the airspace.

Case Study Two

- 2.13 This case study refers to the London Terminal Manoeuvring Area LTMA 20. Several suggestions were received requesting that the base of this airspace should be raised from 4500 feet to 5500 feet. The area in question is highlighted in the chart below.



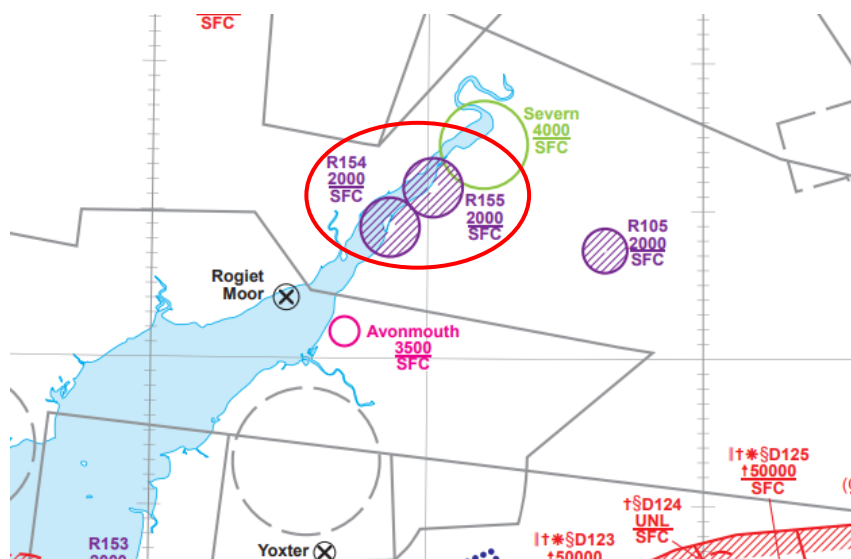
- 2.14 This airspace is potentially part of the wider FASI South project and airspace change masterplan required through the CAA's Airspace Modernisation Strategy. There are currently several live airspace change proposals in the early stages of development that may impact on this area. Until these proposals reach a level of maturity that would enable the CAA to determine the likely impacts, the draft criteria in the proposed procedure make this suggestion unsuitable to be taken forward through the new procedure.
- 2.15 In this case we would instead share the intelligence we have derived with the relevant airspace change sponsor and, where appropriate, the Airspace Change Organising Group⁷. We would request that the sponsor take this additional information into account as part of its airspace change proposal consultation as it progresses through the CAP 1616 process.

Case Study Three

- 2.16 This case study relates to restricted areas R154 & R155 in the Bristol area. These restricted areas were suggested as being no longer required due to a

⁷ The Airspace Change Organising Group, usually known as ACOG, was established in 2019 to coordinate the delivery of key aspects of the Airspace Modernisation Strategy. It operates as a fully independent organisation overseen by the CAA and Department for Transport. <https://www.ourfutureskies.uk/about-us/who-are-acog/>

change of use of the ground below the restricted area. The areas in question are highlighted in the chart below.



- 2.17 It should be noted that any change to the status of restricted airspace would not represent a classification change and as such would not be taken through the new procedure. However, this is an example of how improved ongoing monitoring by the CAA of airspace safety, access or utilisation issues will be used to flag areas where current restrictions exist that may need to be reviewed. In cases such as these we would refer the information received to our Airspace Regulation team who, under an existing CAA procedure, would confirm the requirement by contacting the original airspace change sponsor. If a status change is confirmed, the CAA would request a change in accordance with the relevant policy and for the change to be published in the Aeronautical Information Publication.

Chapter 3

Qualitative analysis of free text responses

- 3.1 This chapter considers the key themes that were raised in the open text boxes and addresses additional comments made at our stakeholder engagement events.
- 3.2 As part of the consultation, respondents were invited to identify each opportunity by completing six open text boxes, with guidance included on the type of information required to be input. A general comment open text box was also included.
- 3.3 Most respondents took the opportunity presented by the open text boxes to share their views, evidence or rationale for their answers. A few recurring themes were evident across the responses. In this chapter we summarise what those themes were, and who raised them.
- 3.4 Much of the feedback made at the stakeholder engagement events is discussed under the Key Themes section, with any additional points raised summarised below.

Methodology

- 3.5 We used a basic qualitative research method to analyse the open-text responses which involved identifying, and then applying a list of key points or themes raised by respondents. To create this list of themes, three members of CAA staff each read 20 responses in full, listing the topics, concerns and comments raised within them. These lists were then discussed and consolidated, creating an agreed list of themes identified by unique tags. Nine staff members then read all 604 unique responses and, using the software contained in the consultation hub, allocated 'tags' to each section of the response. This method ensured that:
- every individual response was read from start to finish by a member of CAA staff
 - the themes we discuss in this chapter were generated by the respondents in their free text responses – they were not pre-identified by the CAA but are the key points raised directly by the respondents themselves, and
 - key themes emerging in each response were noted so that, where possible, they were analysed quantitatively (i.e. so that we know how many respondents, and of which stakeholder group, raised a particular topic or concern).

- 3.6 Each consultation response was analysed by recording the themes raised for each question. If a respondent raised the same theme in several questions, each instance was counted, but each theme was only counted once per question, per response. For example, if a respondent mentioned 'safety' once in response to a question, that counts as one instance; if they mention it three times in response to that question, it is still counted as one instance; if they mention it in response to five separate questions that will counts as five instances.

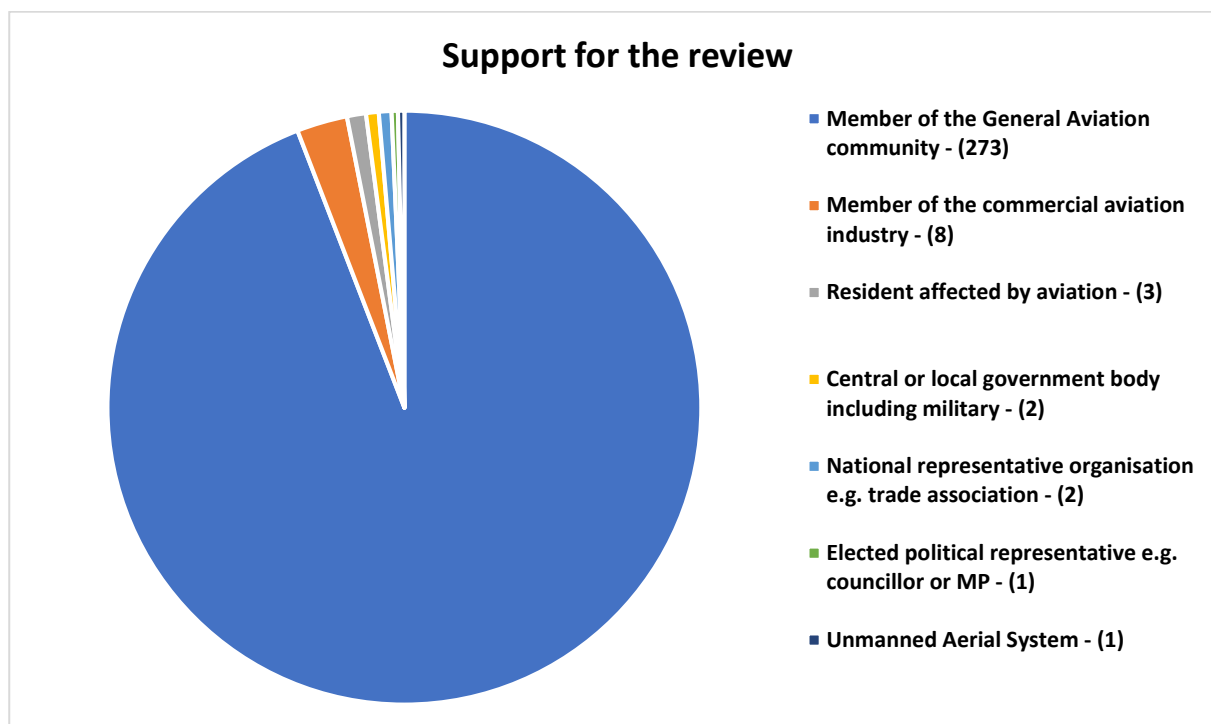
Key themes

- 3.7 There were many themes identified in the consultation responses and the most significant of those are discussed below. For each theme, where we have permission, we have quoted from examples of actual responses to illustrate the sentiments being expressed.
- 3.8 The themes most commonly found in the responses are:
- Support for the CAA's work on the classification review
 - Concerns that the visualisations accompanying the consultation were inadequate
 - Safety concerns
 - Expression of views for or against using airspace flexibly
 - Concern that general aviation needs have been ignored
- 3.9 A full list of the themes used in the analysis can be found in Appendix A.

Support for the CAA's work on the classification review

- 3.10 Support for the concept and intention of the classification review was mentioned 290 times, of which 273 were by members of the general aviation community

Figure 3.1 Respondents mentioning support for the review



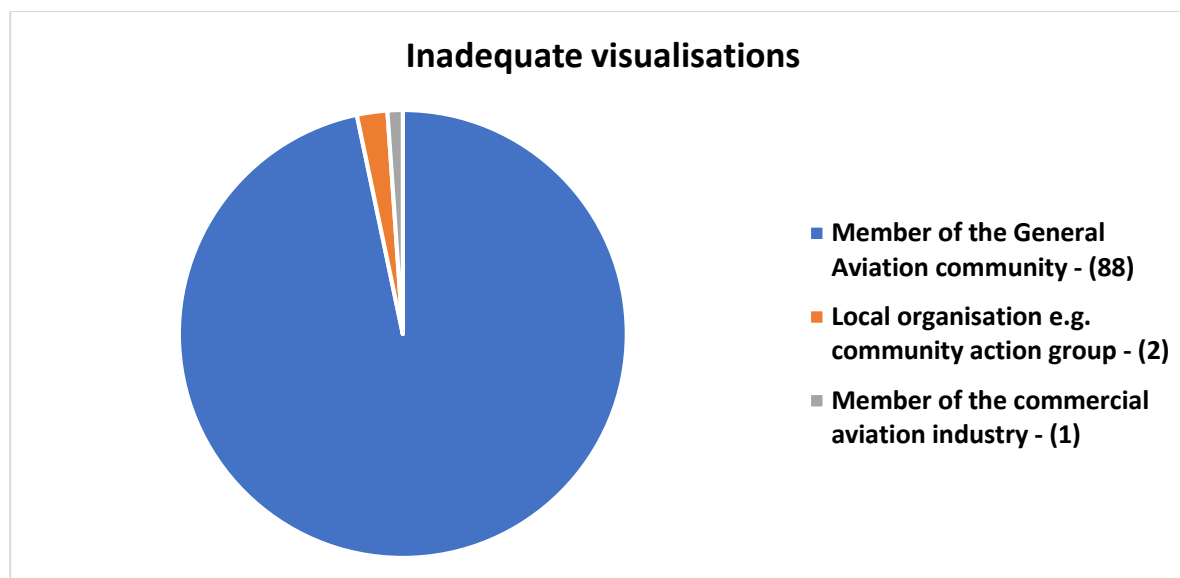
- 3.11 The general aviation community expressed a high level of support for the review with several respondents commenting on the engagement opportunity. One general aviation community member said: *“Fantastic to be given an opportunity to make some comments which may prove beneficial to aviation in general.”*
- 3.12 Particular support was received from the gliding community. A representative from the Southdown Gliding Club said: *“The airspace classification review and project is enormously welcomed by the gliding and general aviation communities, who for decades have suffered the frustration of being excluded from areas of controlled airspace which is rarely if ever used.”*
- 3.13 A member of the general aviation gliding community said: *“I am very pleased at long last there is a review of UK airspace. It has been a long time in coming”,* whilst The British Gliding Association said: *“We strongly support the need to review the classification of airspace in the UK with the aim of safely minimising controlled airspace restrictions.”*
- 3.14 One member of the general aviation community commented on the engagement opportunity presented by the consultation: *“I really welcome this form of consultation: it is hard for individual members of the GA community to arm themselves with data and finance to respond fully and effectively to Airport operators’ continual requests to aid their commercial expansion - this initiative helps give us a voice and some degree of confidence we may be listened to - SO A SINCERE THANK YOU!”.*

- 3.15 Support was also received from members of the commercial aviation industry. Birmingham Airport Air Traffic Ltd said: *“Birmingham Air Traffic Control welcome the review of Airspace Classification and are committed to continually improving the design, classification and operation of its airspace. We are committed to the ethos of Airspace for all in equal measure and fully support the UK Airspace Modernisation program. While we can demonstrate that our airspace is fit for purpose for the foreseeable future, we will always seek to identify improvements that enhance safety.”*
- 3.16 Heathrow Airport echoed this point commenting: *“Heathrow Airport is fully supportive of the CAA’s Airspace Modernisation Strategy, which aims to deliver an efficient use of airspace through the modernisation of both airspace design and air traffic management tools and techniques.”*
- 3.17 Norwich Airport also expressed support, saying: *Norwich Airport welcomes and supports any process that reviews and updates procedures and protocols; this includes the management of airspace.”*

Visualisations accompanying the consultation were inadequate

- 3.18 Dissatisfaction with the visualisations included in the consultation was mentioned 91 times, 88 of which were from the general aviation community.

Figure 3.2 Respondents mentioning that the visualisations were inadequate



- 3.19 There was a high level of dissatisfaction expressed over the quality and usefulness of the visualisations included in the consultation. A representative from SkyDemon, a provider of navigation services, commented that *“This review consultation was published without enough data for stakeholders to properly comment. The data provided is appalling and is not fit for use”*

- 3.20 A representative from the Light Aircraft Association commented that: *“We are disappointed to note the data supplied in the consultation documentation is inadequate and potentially misleading. The visualisation images do not provide a clear indication of activity in the various controlled airspace areas shown. Movement data is available but was not supplied in the consultation. We are very surprised by the apparent lack of detail from the consultation sponsor.”*
- 3.21 Several comments were received on the accuracy of the visualisation diagrams in demonstrating the flight volume position at each airfield. Respondents felt that the traces shown were too wide, and the inclusion of general aviation traffic with commercial gave the impression that the controlled areas were heavily used. It was widely felt that this was not the case for many of the airfields, and a more professional analysis that distinguished between commercial and all other traffic movements would demonstrate that.
- 3.22 In our engagement events to support the consultation, this issue was also raised. Stakeholders offered to share data on specific requests to support identified opportunities and requested that CAA should additionally look at future traffic profiles to inform our analysis. It was felt that the visualisations provided to support the consultations represent historic data and should not be used in isolation in the decision-making process.
- 3.23 Attendees at our engagement events also raised a concern that the CAA limited ‘opportunities’ to two per response in the consultation, when General Aviation organisations, representing a wide range of people, will come up with more than two (with overlapping or different views) that would be valuable for the CAA to consider alongside individual responses.

CAA response

The CAA appreciates that many respondents felt that the images supplied to support this consultation failed to provide adequate information to enable an informed response. We wanted to publish a single and simple evidence base to assist respondents in identifying volumes of airspace for the review. While there is no perfect data set, NATS’ radar data offered the best coverage over the UK and is factually accurate. The images used were ‘snapshots’ – in time, height and region and were designed to be a starting point for further analysis and discussion. While the images were used to help respondents visualise and identify airspace volumes, the CAA will undertake further analysis and apply logical criteria to decide whether to amend an airspace volume. Further details on our proposed approach is outlined in more detail in our consultation document, Draft Procedure for Reviewing the Classification of Airspace, CAP 1934.

It was important to keep the consultation, and the analysis we would have to do to respond to it, proportionate. We therefore made the decision to limit the

number of suggestions we received. We received over 1000 opportunities through this initial consultation from over 600 respondents and, as shown throughout this document, we have analysed the responses to correctly identify the volume of airspace being raised by the respondent and to consider whether we can take it forward for amendment. Once the new procedure has been implemented, the CAA will regularly consider whether to undertake a review of the classifications of airspace, and there will be other opportunities in the future to identify airspace volumes that could be amended.

Safety concern

3.24 A safety concern with a specific area of airspace was mentioned 121 times, and the potential safety implications of any further increases in controlled airspace was mentioned 65 times. Of these concerns, those originating from the General Aviation community were 95% and 87% respectively.

Figure 3.3 Respondents mentioning a current safety concern

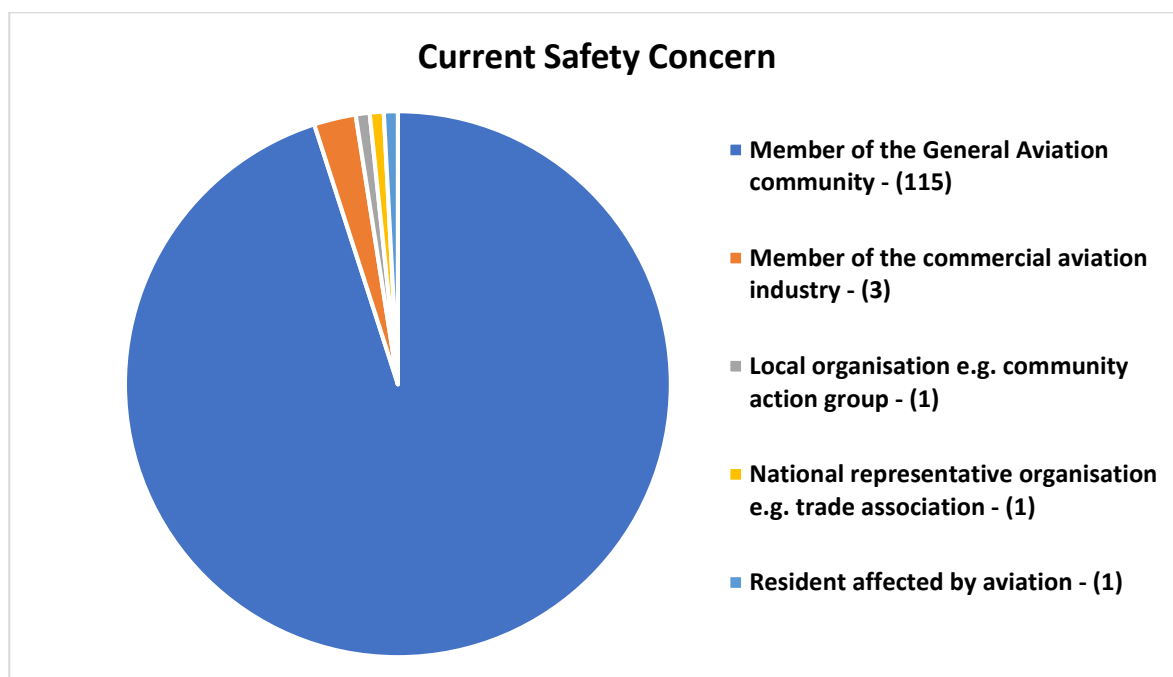
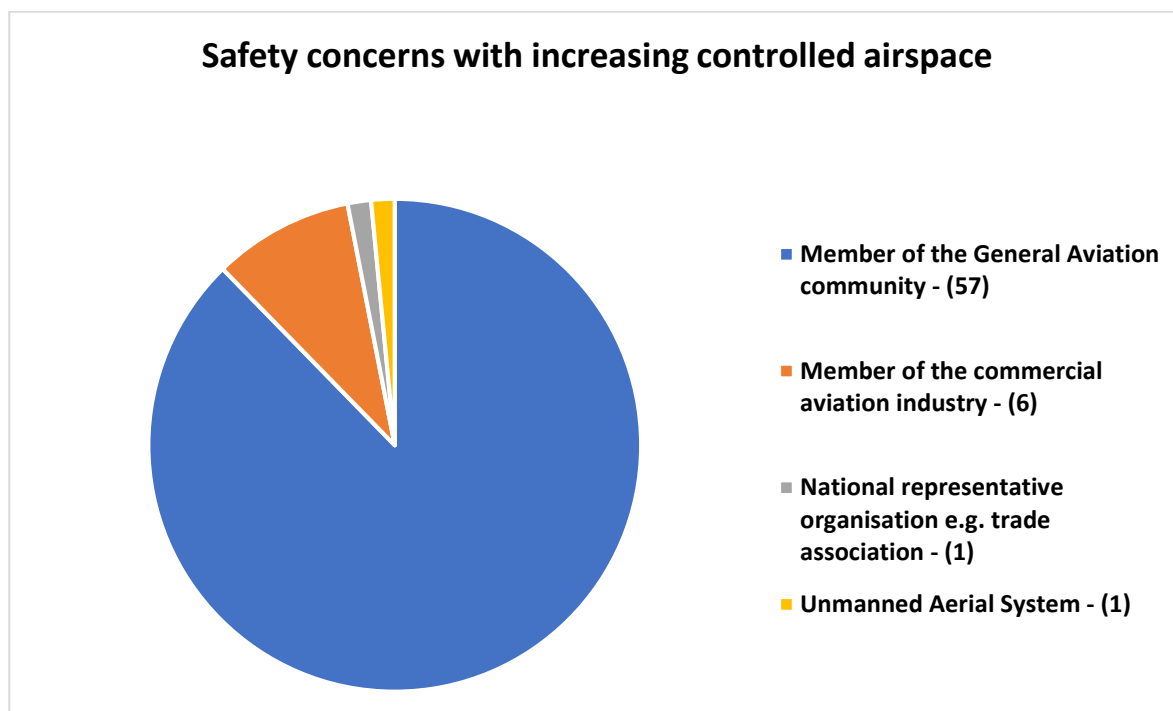


Figure 3.4 Respondents mentioning a safety concern with increasing controlled airspace



- 3.25 A high level of support was expressed for the need to modernise and rationalise UK airspace to create structures which are safe, efficient and proportionate for all users. A common concern however – expressed on numerous occasions by the general aviation community – involved safety issues of the current airspace design and the implications of continually increasing the level of controlled airspace. One member of the general aviation community said: *“The increasing controlled airspace has significantly reduced the height of Class G airspace for gliding which has brought gliders in closer proximity to other powered traffic.”* Another commented *“We are forced to fly lower than we would like, and in many obvious known choke points, throughout large regions of the UK, especially in the South, just because of the poor and out-dated design of the UK’s airspace. This is a flight safety issue. Height = safety. The higher we are - the safer we are, so CAA, please don’t unnecessarily limit the height we can climb to, because if the CAA does that, then the CAA is reducing our safety margins.”*
- 3.26 Similarly, other general aviation community members expressed concern that the current restrictions on general aviation movements had resulted in flights being funnelled into tight corridors, creating pinch-points, which *“increase the chance of mid-air collisions, near misses and infringements.”* Many comments were made on the need for this, and future reviews of airspace to *“...consider the safety of general aviation pilots in your reviews.”*
- 3.27 Members of the commercial aviation industry also commented on the need to address the level of airspace infringements. Air Navigation Solutions said: *“Systemisation of VFR traffic allows higher numbers of VFR within controlled airspace and potentially lowers the number of airspace infringements. This can*

be further reduced by increasing air traffic services available in uncontrolled airspace.”

- 3.28 Similarly, Heathrow Airport said: *“A specific concern would be a potential increase in incursions if there was to be a change to controlled airspace around Heathrow, as this could increase uncertainty for pilots as to which parts of airspace they can or cannot access.”*
- 3.29 A commercial airline commented that current controlled airspace, where used, needs to be preserved, and where it is proven necessary, extended, to allow for *“the expansion of current civil airline use. This will increase our level of protection from other traffic as well as military and drones.”*
- 3.30 The safety implications of changing an airspace classification was also mentioned at our engagement events. Stakeholders suggested that the CAA should not lose sight of the excellent safety record of current airspace, noting that safety is of a high standard despite the complex traffic mix of General Aviation and commercial airfields co-existing in the busy London area.

CAA response

The CAA fully appreciates the safety concerns highlighted by respondents. The primary concern of the CAA is the safe operation of all flights and our safety duty sits above all others in Section 70 of the Transport Act 2000. We fulfil this duty when making airspace change decisions and all our decisions are held to the highest safety standard.

The CAA’s new role to review and amend airspace classifications will give us an opportunity to review the extent of controlled airspace and to change it safely. In designing the new procedure, our overriding objective will always be to maintain a high standard of safety, and any additional safety drivers that may lead to improvements in airspace classifications can be explored through this new process.

Views for or against using airspace flexibly

- 3.31 Support for the introduction of using airspace flexibly was expressed 43 times, 81% of which were from the general aviation community. Five respondents expressed concern with the deployment of flexible airspace.

Figure 3.5 Respondents supporting flexible airspace use

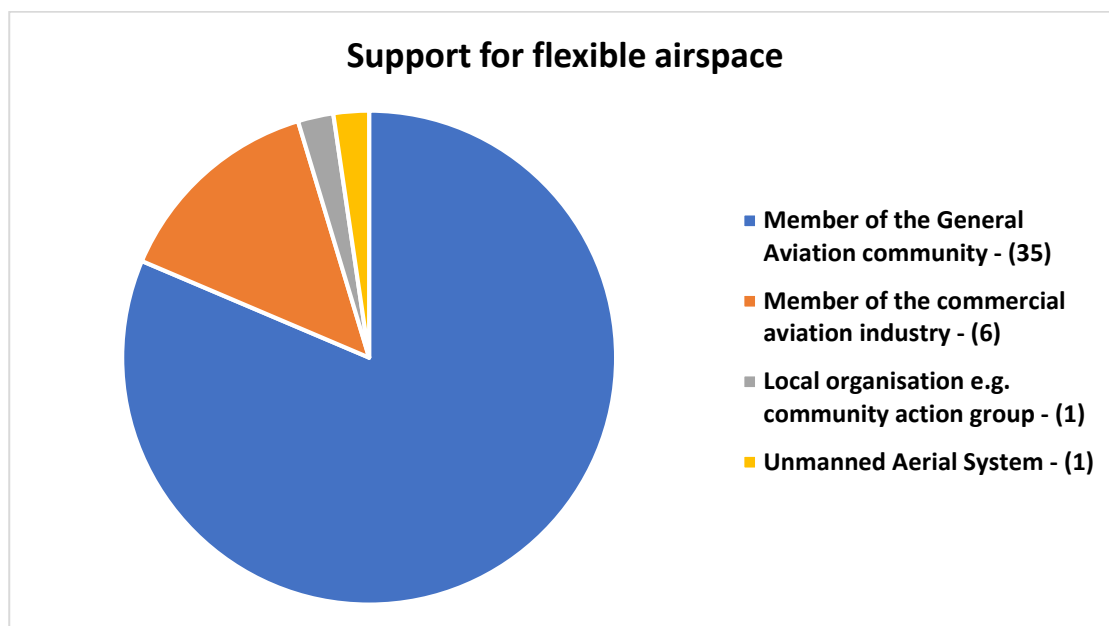
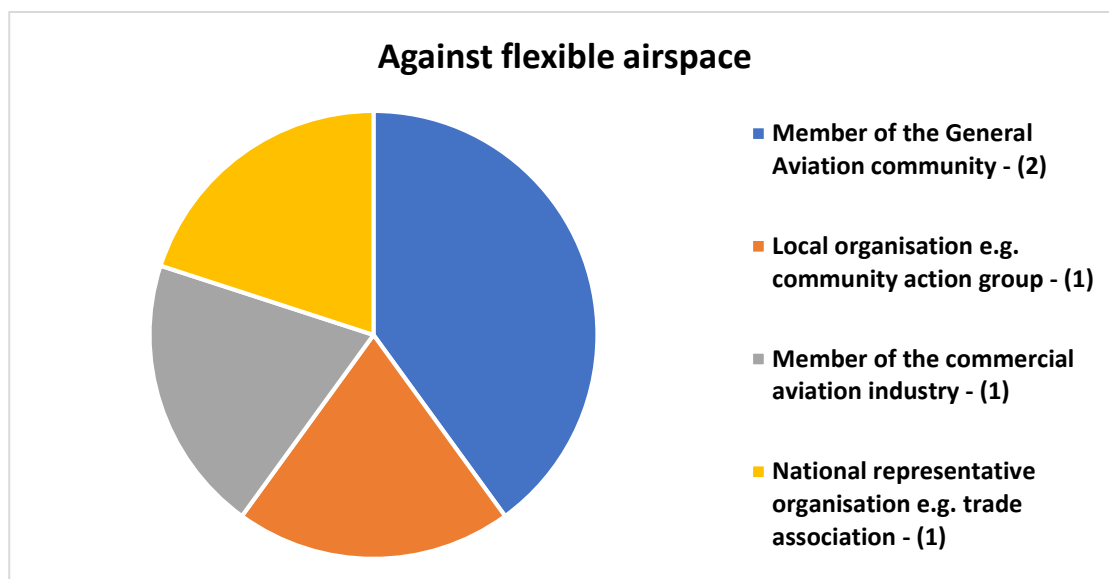


Figure 3.6 Respondents against the introduction of flexible airspace use



- 3.32 Several respondents expressed support for the deployment of flexible airspace. An unmanned aerial system organisation stated *“we welcome the efforts of the CAA to modernise airspace classification to better reflect the varying and diverse needs of the UK’s airspace users. We also agree with the proposition that flexible airspace classification would maintain essential levels of safety while significantly improving efficiency”*. They went on to say: *“...although airspace should be classified as controlled during times of use by pre-authorized manned aircraft, it should not be unnecessarily blocked off to other airspace users (including drone operators) in times when it could be available”*.

- 3.33 Similarly, representatives from the general aviation community commented: *“More flexible use of airspace, maybe by time of day, use of mandatory radio areas etc is to be welcomed rather than permanent control”* And *“Our airspace must be managed flexibly, both in terms of daily/seasonal changes and a change so that an existing allocation can be rescinded as easily as it was granted”*.
- 3.34 Several respondents commented on the need for technological solutions, such as electronic conspicuity, to be implemented to support the deployment of flexible airspace, ensuring maximum collaboration and communication between all airspace users. Comments from the general aviation community included: *“Consideration should be given to developing Electronic Conspicuity interoperability that allows users to roam more freely around the UK where levels of traffic are low”*. Another commented, *“Personally, I believe that flexible time of activation combined with better application of Electronic Conspicuity options would increase safety in this region.”*
- 3.35 Other respondents felt that the introduction of flexible airspace would just add confusion. Members of the general aviation community commented: *“Any amendment has to be permanent, there are enough incidents of zone infringements with fixed zones without adding the complication of time restricting.”* And *“Ideally the amendment should be permanent to avoid confusion.”*
- 3.36 This view was echoed by Prospect Air Traffic Controllers Branch, the professional Trade Union representing UK Air Traffic Controllers, who stated: *“Flexible use of airspace is a common approach taken with our partners in the military and generally works well at higher altitudes, allowing civilian aircraft to access military airspace when it is not in use. However, these procedures are very clear with a centralised system and authority in place for allowing aircraft to enter these areas at appropriate times. There is a significant risk that if flexible airspace was introduced at lower levels around airfields, confusion could arise, particularly in the general aviation community about times the airspace is available, almost certainly increasing the number of airspace infringements.... Flexible use of airspace has its benefits, but we strongly caution this approach around busy airfields, and we believe it could introduce significant additional risk, that will require strong mitigation.”*
- 3.37 Attendees at our engagement events also expressed concern with how general aviation pilots will be educated on using airspace flexibly (particularly the lighter end of general aviation, with limited technology) and further moves towards ICAO rules of the air. Several attendees stressed that any technological solutions implemented by CAA must be proportionate and mindful of the potential costs.

CAA response

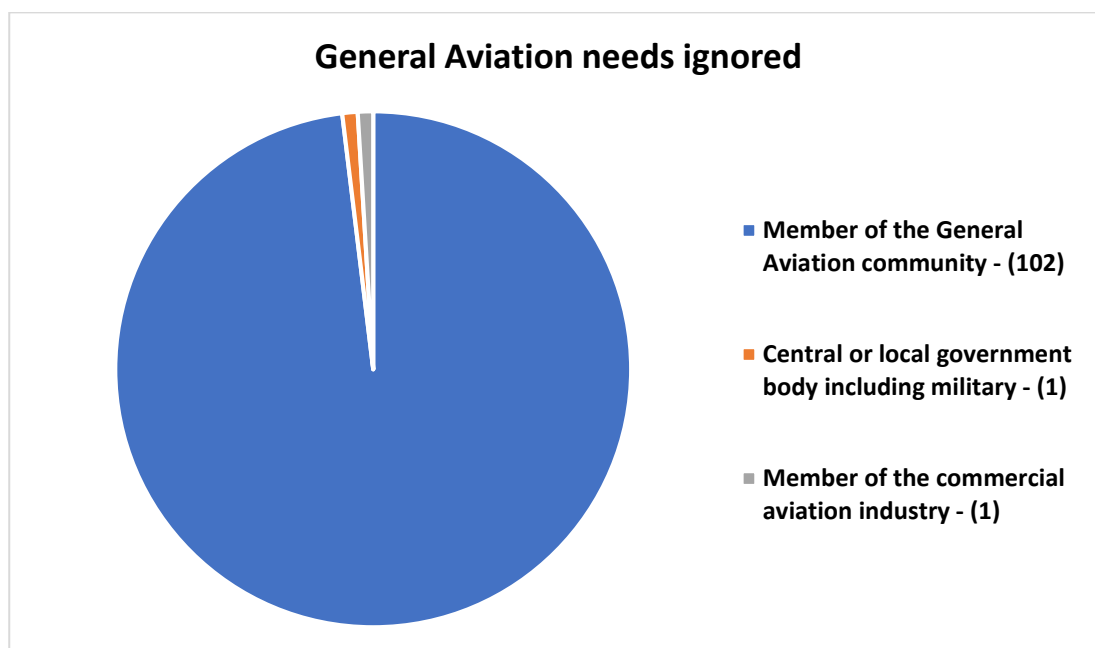
UK airspace is a finite resource and as the demand for airspace access from both existing and new users continues to grow, airspace sharing methods will be one of the ways the UK will enable equitable access where possible. For example, using airspace flexibly is a concept where controlled airspace is in effect 'switched off' when it is not in use for Instrument Flight Rules traffic. To deliver this methodology, new procedures, supporting technologies and associated education and training will need to be introduced. We are also considering short term measures that could include existing Letters of Agreement⁸ where it is appropriate to do so.

The CAA's overriding duty is that those flying and those overflown are kept safe. Any introduction of using airspace flexibly will always have to be safe and any new procedures developed will fully take that into account.

General aviation needs are being ignored

- 3.38 There were 104 instances where respondents felt that the needs of the general aviation community were largely being ignored. Of these comments, 102 were made by the general aviation community.

Figure 3.7 Needs of the general aviation community are being ignored



- 3.39 Comments were received from the general aviation community on airspace change decisions taken within the last few years, and the resulting detrimental

⁸ A letter of agreement is a formal agreement between 2 parties describing operational scenarios, associated procedures, the operational responsibilities placed upon each party and emergency contact information

effect they have had on the community and their ability to use airspace. General Aviation respondents, particularly those from the gliding community, felt that their interests had been side-lined in favour of financial interests rather than safety, with one gliding community member saying: *“Unfortunately the allocation of controlled airspace seems to be almost exclusively to the benefit of commercial operators and airfields. Further, it is an almost completely additive process, underutilised and unnecessary airspace is almost never removed and hence the GA community in particular are left with less airspace and compromised flight safety as a result.”* The member went on to say: *“Controlled airspace should not be permanent and should be subject to regular review and if it is no longer justified it should be removed. I hope that this review is the start of such a process and not just paying lip-service to GA’s needs”.*

- 3.40 Similarly, many respondents expressed concern that these restrictions have had a debilitating effect on the health of general aviation industry, cautioning that: *“Many of our future professional pilots (military and civilian) will likely be starting off in GA powered and/or gliding experiences - that experience is being diminished, and events threatened as the volumes of available GA airspace is needlessly eroded.”*
- 3.41 Despite welcoming the review, several concerns were expressed that it will fail to deliver any tangible benefits to the general aviation community. One member said: *“Whilst on the one hand I am pleased that a consultation is taking place, on the other hand I have no confidence that the CAA will take note of GA’s comments, or needs.... In creating controlled airspace consideration needs to be given to the people who use the uncontrolled airspace”*

CAA response

The CAA understands that recent airspace change decisions have frustrated members of the general aviation community. The CAP 1616 airspace change process,⁹ has been designed to give all those who feel that they may be impacted by the proposal an opportunity to have their views heard. Under the oversight of the CAA, the change sponsor is required to show how they have responded to these views, including where appropriate how impacts can be mitigated.

The new role given to the CAA by the Secretary of State means that we will review and, where appropriate, amend airspace classifications through a new procedure. As outlined in Chapter 1, the new Directions require the CAA to ensure that the amount of controlled airspace is the minimum required to maintain a high standard of air safety and, subject to overriding national security

⁹ [CAP1616](#)

or defence requirements, that the needs of all airspace users is reflected on an equitable basis. The CAA will be guided by our statutory duties and government policy. With competing stakeholder interests to consider, our decisions will not always fall in the favour of any given stakeholder group and this includes the general aviation community. We have noted the feedback received through this first review and will assess every suggestion received. As a result, our first plan to amend volumes of airspace where a reduction in controlled airspace and its classification may be possible, will be published following the implementation of our new procedure in December 2020.

Additional feedback from stakeholder engagement events

- 3.42 Four stakeholder engagement events were held in January 2020, at which a range of stakeholders were invited to share their views and ideas on the purpose of the review and how the CAA planned to carry out the work. The format for these events and the organisations that attended are set out in Chapter 1. Much of the feedback from these events is discussed under the Key Themes section above, but a summary of additional points that were raised is set out below. This summary is anonymised and brings together points made across all the events.

Transparency and communication

- 3.43 Attendees mentioned that the CAA needed to be clearer on the benefits of the airspace classification review and to ensure that they are widely understood. They also said that transparency is required on the work the CAA is doing on innovation and on the level of environmental impact analysis that would be carried out during the decision-making process. The reach of the consultation was questioned. Did we originally consult widely enough and include all the community groups?

CAA response

The CAA understands the need for the benefits of its new role in airspace classification to be widely understood and engaged with. Our communication strategy during this initial consultation focussed on involving a wide section of stakeholders and we were encouraged by the number of responses received. All communications to representative groups included a request to pass the information onto their members and encourage a response to the consultation. A description of how we plan to carry out this work and the benefits we anticipate

for airspace modernisation generally is outlined in our consultation document, Draft Procedure for Reviewing the Classification of Airspace, CAP 1934.¹⁰

The CAA appreciates that the innovation landscape is changing quickly, and our Innovation Hub continues to work with industry to help answer regulatory questions, including those relating to airspace use. More information on how we are supporting innovation in aviation and a range of guidance papers can be found on the Innovation Hub's section of our website.¹¹

Section 70 of the Transport Act 2000 requires the CAA to take account of environmental objectives. The Secretary of State has asked the CAA to consider the environmental consequences of proposals we make for airspace reclassification, but he also specifically *disapplied* the existing Air Navigation Guidance which we apply to a change in airspace design going through the CAP 1616 process. We are proposing that the principles we use for environmental assessment would be the same as the Air Navigation Guidance, but without any of the obligations on process that the guidance contains.

Funding and resource

- 3.44 A general concern was expressed about how the CAA's new function will be funded. Attendees were concerned that the CAA lacks the resource and instrument flight procedure experience to carry out the airspace modernisation programme and questioned whether additional resource could be found within the Department for Transport.

CAA response

Airspace resources are usually included as part of the En-Route Rate, which best captures all commercial airspace users, but the timing of the new Directions meant that this new activity had not been included in the budget. We are considering whether there are other options for recovering our costs. Our proposed approach to resourcing the work for the first twelve months is outlined in our consultation document, Draft Procedure for Reviewing the Classification of Airspace, CAP 1934.

Airspace Modernisation

- 3.45 In the discussion, some attendees suggested that the CAA's work on classifications should integrate with other areas/groups working on airspace design and technology being developed in this area and align with the Airspace

¹⁰ <https://consultations.caa.co.uk/policy-development/draft-procedure-to-review-airspace-classification>

¹¹ <https://www.caa.co.uk/Our-work/The-CAA-Innovation-Hub/>

Modernisation Strategy Masterplan. It was recognised that work was currently being carried out on the “FASI” airspace changes which involve a complex range of stakeholders. This includes the airspace changes associated with two of the initiatives in the Airspace Modernisation Strategy, including those in the airspace change masterplan that the CAA and the Department for Transport commissioned from the Airspace Change Organising Group.¹² It was suggested by attendees that this should be the focus of the CAA’s work, and make the best use of what they termed the CAA’s ‘limited resource and experience’. It was mentioned that the vast amount of airspace covered in the airspace change masterplan may result in a reduction of controlled airspace which could benefit other airspace users such as members of the General Aviation community. It was suggested that the industry’s heavy investment in the current system needs to be recognised as well as its need to make a rate of return on that investment.

- 3.46 There was a concern that a classification change may impact on an approved and implemented airspace change proposal, which would have been highly resource - and cost - intensive for the sponsor.
- 3.47 Some attendees suggested that Government policy needs to clearly outline and disseminate information on increasing capacity and reducing emissions (which airspace design can deliver but will impact airspace users) and whether that is more of a priority than giving General Aviation greater access.

CAA response

The new procedure we are proposing includes the use of a series of filters to remove proposals that are unsuitable to be taken through the new procedure because they are part of an ongoing or recent airspace change proposal.

In cases where a classification amendment is not progressed due to an ongoing or recent change in airspace design, the CAA will formally notify (where appropriate) the relevant airspace change sponsor and the Airspace Change Organising Group¹³ of the intelligence we have derived.

The order of prioritisation between different airspace factors is a matter for government policy.

¹² See Chapter 6 of the Airspace Modernisation Strategy, CAP 1711. ACOG is the Airspace Change Organising Group, set up by NATS to prepare the airspace change masterplan.

¹³ The Airspace Change Organising Group, usually known as ACOG, was established in 2019 to coordinate the delivery of key aspects of the Airspace Modernisation Strategy. It operates as a fully independent organisation overseen by the CAA and Department for Transport. <https://www.ourfutureskies.uk/about-us/who-are-acog/>

Existing CAA policies to be reviewed

- 3.48 At the engagement sessions, the CAA asked attendees to consider whether there were any existing policies that were out of date and should be reviewed. The Controlled Airspace Containment Policy, published in January 2014¹⁴, and The Application of ICAO Airspace Classifications in UK Flight Information Regions, published in November 2014¹⁵, were highlighted as a CAA policy documents that could benefit from a strategic review.
- 3.49 Rule 11 was highlighted as being unclear. The Rules of the Air Regulations 2015, of which Rule 11 is part, alongside the Standardised European Rules of the Air, fulfil several aspects of the UKs obligations towards the implementation of ICAO Standards and Recommended Practices and the Procedures for Air Navigation Services.
- 3.50 A concern was expressed over the intent of the consultation and how it relates to the Regulatory requirement under EU 2017/373 Annex IV Part-ATS. Once implemented, the new process to review airspace classifications will consider all factors affecting airspace modernisation, including new or amended regulatory requirements, and our international obligations (ICAO or EU). This will enable airspace classifications to be assigned, providing air traffic services appropriate to the airspace user requirement, as well as enabling us to achieve our safety objectives.

CAA response

The CAA plans to review The Controlled Airspace Containment Policy, published in January 2014, and The Application of ICAO Airspace Classifications in UK Flight Information Regions, published in November 2014. Recent events have exacerbated our efforts to commence this work, so we are unable to promise a firm deadline at the time of writing this report.

The Rules of the Air Regulations must, from time to time, be reviewed, and the CAA intends to examine Rule 11 as part of our work on the prevention and treatment of Airspace Infringement.

Other related CAA policies may be reviewed where affected by this work.

¹⁴ [The Controlled Airspace Containment Policy](#)

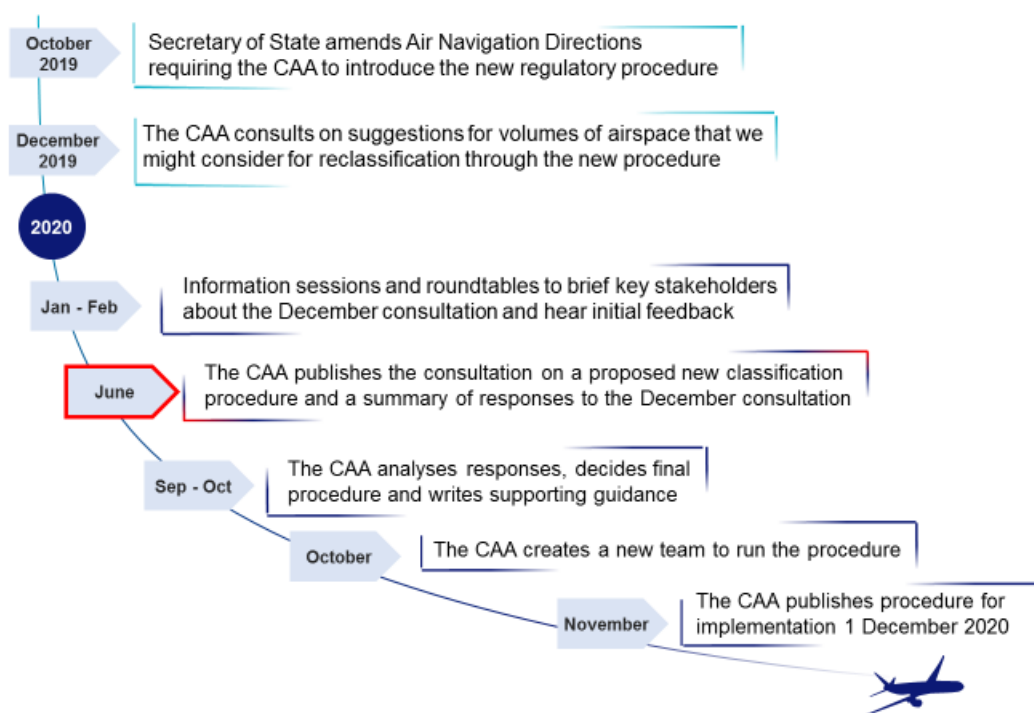
¹⁵ [The Application of ICAO Airspace Classifications in UK Flight Information Regions](#)

Chapter 4

Next steps

- 4.1 A timeline for next steps is shown in Figure 4.1 below. It is our intention to take the airspace volumes suggested by respondents through this first review through our new classification procedure. This will form part of our first plan which will be published following the 1 December 2020 implementation of the new procedure.

Figure 4.1 Timeline for the development and implementation of the new procedure



APPENDIX A

Themes used to assess free text responses qualitatively

Themes
Respondent supports the concept and intention of a classification review
Respondent concerned that no changes to classifications will be made because of the review.
Concern that General Aviation access to airspace will be reduced further following the review
No change to airspace required. Review is short sighted, reducing volumes of airspace can't be an option. Existing airspace is already heavily utilised by all users and in the safest possible way.
Review biased in favour of General Aviation community regarding reducing airspace volumes or categories.
Review biased in favour of commercial air transport .
Respondent finds the proposal/ consultation document complex/ difficult to understand
Respondent finds the visualisations inadequate/not granular enough/misleading
General Aviation needs are being ignored
Concern that any further increase in controlled airspace could have safety implications
A specific airspace volume causes a current safety concern
Respondent supports the use of flexible airspace
Respondent against deploying flexible airspace
Respondent's opportunity involves recent airspace change decision or Post Implementation Review
Respondent has an environmental concern
Industry should make better use of technology to improve airspace access or reduce controlled airspace