

# Airspace Classification Review – Cotswold Region

## Your questions answered

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### 1. What is the role of the Airspace Classification Review team?

The Airspace Classification Review team is a newly established team within the CAA, tasked with carrying out a new function to review the classification of UK airspace. The Secretary of State for Transport, through the Air Navigation Directions, has given the CAA a clear mandate to regularly consider whether airspace classification should be reviewed, to carry out a review in consultation with airspace users, and, where a change to classification might be made, to do so in line with a new procedure. The CAA's procedure for the CAA to review the classification of airspace (CAP 1991), was published in December 2020 and sets out the 3-stage process to achieve this: Consider, Review, Amend.

As well as reviewing the classification of airspace, the airspace classification review procedure also enables the team to consider whether there are other mechanisms and tools available which may help enhance airspace usage. This could include as an example, the facilitation of a new Letter of Agreement between Airspace Control Authorities (ACAs) and/or users.

### 2. How long will it take to carry out the process laid down in CAP 1991?

The airspace classification review process is a new process to the CAA. As a result, we cannot give a definitive view for the timescale of the process. Similarly, each airspace volume is different and so each review and possible amendment will vary in complexity meaning that the length of each stage will vary according to the airspace.

To help maintain the highest level of transparency, we will provide ongoing updates via our web page and through our regional stakeholder engagement; the engagement plan will also be published. We will regularly attend meetings such as the Airspace Infringement Working Group (AIWG), Local Airspace Infringement Team (LAIT) meetings, Airspace Engagement Group (AEG) and other similar meetings, both to gather information and to update attendees on the status of our work.

### **3. What are the reasons for filtering out volumes of airspace not suitable for this process?**

Some airspace volumes may not be suitable for this process because they are already subject to an ongoing or recent airspace change proposal, or because of the potential impacts that changing the classification might have, for example, on Ministry of Defence (MoD) operations.

The Airspace Change Proposal (ACP) process, delivered through CAP 1616 (formerly CAP 725), is initiated by a Change Sponsor after the identification of either an operational need or a safety issue that needs to be addressed. The airspace in question will be subject to a high degree of scrutiny and investigation, with the process requiring significant levels of engagement and formal consultation with relevant stakeholders.

The ACP process is complex and the involvement of the Airspace Classification Review team into an ongoing change proposal could undermine the work already carried out on it. Similarly, post ACP, there is a period known as the Post Implementation Review period during which the effects of the airspace change need to be observed and understood to determine how the airspace change has performed in relation to the original Statement of Need, design principles and options appraisal. Again, it would not make sense for us to initiate a review of airspace classification while this Review is underway.

Further details on each of the filters and where they may be exceptions to these can be found in CAP 1991.

### **4. How will you choose which airspace to consider, the UK is a big area?**

Much thought has gone into this. The airspace in the UK is complex and very few sectors operate in isolation and so a holistic view is required. However, to look at UK airspace as a whole is not practical given the available resources of the team. As a result, we will divide the airspace into manageable geographical areas.

We will use a regional approach loosely based on existing altimeter setting regions (ASR), with slight alterations to the delineated boundaries to better “fit” the airspace sectors in and around them. It may be, for example, that we choose to extend or contract the boundary to better reflect sectors or airspace that are highly integrated with one another.

See question 5 for explanation regarding selection of current area of focus.

### **5. Where is your current area of focus and why has this region been chosen?**

Our current area of focus is based around the Cotswold altimeter setting region (the “Cotswold Region”) that is depicted on the VFR charts and in the Aeronautical Information Publication (AIP). We have slightly modified the delineated boundary, to better align with airspace sectors and design. Our amended boundary excludes airspace associated with Luton and the area has been expanded to the south west to include airspace associated with Bristol and Cardiff and to the North to include all of the Cotswold CTA Flexible Use airspace and Niton CTA 9.

This region was chosen owing to the high number of responses from the CAA's legacy consultation on airspace volumes for review that took place between December 2019 to March 2020. In addition, it has been highlighted to us as an area of interest by the UK Airprox Board. It contains a wide range of airspace types from which we can gain valuable insight, (for example, flexible use airspace, improving our understanding of how this works and informing decisions regarding recommendations for its use elsewhere) and also, that the level of complexity of the airspace composition, is considered to be appropriate for the first application of this new procedure.

## **6. Will the Airspace Classification Review Team be called upon to review additional airspace sectors outside of the current area of focus?**

Airspace sectors within the UK are highly interdependent on one another and as such it is difficult to look at any small area in isolation. This is one of the reasons that the team will be using a regional approach and as such it is unlikely that additional airspace sectors outside the current area of focus will be looked at.

Should an operational need arise requiring a change to a sector of airspace it is expected that the responsible Airspace Control Authority (ACA) or airport will sponsor an Airspace Change Proposal (ACP) in line with current practices using CAP 1616. If, however, an exceptional case outside of the region under review is presented to the team and it is considered to be a higher priority, assuming resource is available, it could be considered.

## **7. What information sources are you using to inform your review?**

Having the best understanding of how the airspace is used within our selected region is a key requirement for us to effect positive change and as such we are gathering and using information from a wide range of sources.

There will be extensive engagement and consultation with airspace users and stakeholders as well as Airspace Control Authorities (ACAs) and Air Navigation Service providers (ANSPs). We will use safety data such as airspace infringement and airprox data, along with other sources including aircraft movement data using our Airspace Analyser Tool, which utilises Plane Finder data. We will also incorporate data gathered by other user groups (such as A4A).

## **8. I have information relating to UK airspace, how can I pass that on to you?**

We welcome any insight and information relating to airspace in the UK whether it is in our current area of focus or not, especially if it relates to how the airspace is used or constructed (see bullet points below). If your information is in relation to denied access to controlled airspace or the refusal of an air traffic service, please submit a CAA form FCS 1522. By doing this, the information will not only be available to the airspace classification review team but also other departments which have interest in air traffic service provision.

- If the information is related to our current area of focus, please check whether there is any live engagement or consultation in process. If so, follow the instructions associated with that to feed us with the information. Details of current engagement or consultation can be found on our web page. If we are not running any current sessions, please see below.

- If your information is related to an area that **is not** within our current area of focus, or we are not currently running an engagement/consultation for it, we would still invite you to tell us using our email address: [airspace.classification@caa.co.uk](mailto:airspace.classification@caa.co.uk). Such information could contain valuable insight that we could employ elsewhere. This information will be collated with other information received and will be used to help inform our decisions including where our next area of focus might be. Details are again on our webpage.

## **9. How have you determined who to engage with and when?**

The airspace classification review process sets out an approach to stakeholder engagement aligned to the requirements of the Airspace Modernisation Strategy (AMS). The AMS requires the CAA to engage with entities who are either representatives of airspace users or are a conduit to them. Our key stakeholders in this process include all air navigation service providers (ANSPs), Airspace Control Authorities, (these groups include National Air Traffic Service (NATS) and the Ministry of Defence (MoD)), and aviation organisations that are likely to be impacted by changes proposed within the identified region of focus. CAP 1991 states that engagement is to take place at the Consider, Review and Amend stages of development of a proposal for amendment and that this engagement should be in a manner that is proportionate to the change being proposed.

Our intention, to ensure that the most collaborative and informative approach is followed, is to go beyond this requirement. Following the production of an initial report into our region of interest, in addition to engagement with the bodies above, there will be virtual engagement discussions which are open to other interested stakeholders. These will be accompanied by an online survey which will be used to collate feedback during the Review stage. This will help draw up our initial plan of airspace volumes to take through to the amend phase of our process. A formal consultation will then be carried out on that plan as to whether these are the right areas to take forward to amend.

A further engagement exercise will be carried out during the amend phase where a consultation will take place on each of the proposed amendments. This will set out the proposed changes and the implications of the changes for airspace users and anyone else affected by the change. Our aim for this consultation is to seek views on whether these changes can be implemented safely and whether they are operationally workable.

Our consultation strategy and plan for each consultation phase will be published on our web page.

## **10. I am a stakeholder in your chosen area, when will you be talking to me?**

We will be engaging with stakeholders at all three stages of our process “Consider, Review and Amend”. Please see our dedicated page on the CAA’s website for more information on upcoming engagement/consultation sessions, Further information can also be found in question 9.

**11. How will you use the information you gather to identify volumes of airspace to amend?**

The information gathered will initially inform the team's understanding of how the airspace is currently used. We will discuss the findings with relevant stakeholders and corroborate this insight using our Airspace Analyser Tool. We will then identify what changes to airspace classification or air traffic management procedures might be introduced to improve equitable access or increase safety.

The proposed volumes of airspace for review would then be examined in even greater detail to determine what would be the desired outcome from any intended change. Following that, options for change will be generated and analysed, and any proposed amendment consulted on ahead of submission to the CAA's Airspace Regulation department for approval.

**12. I have just taken part in a consultation for an Airspace Change Proposal (ACP), why are you asking for information as well?**

Consultations must follow a specific process and are designed to gather information and opinion on a specific topic, area or suggestion. This gives the sponsor of an airspace change proposal (ACP) information necessary to move the process forward, but this information is specific to them and any change they intend to make. As a result, the information gathered may not be appropriate for use by another party. As our process matures within a region, we too will be formally consulting and seeking responses to our specific proposals. Whilst we appreciate that this does involve an amount of work from contributors it is a necessary part of ensuring people can have their say.

We will also conduct less formal engagement sessions where insight may be sought. This may be part of a request during a targeted information gathering drive, through ongoing, established meetings with our stakeholders or it can be submitted at any time. Please refer to question 8.

**13. What has happened to the results of the December 2019 – March 2020 Consultation?**

The CAA's consultation inviting people to suggest volumes of airspace for consideration under this process generated over 1100 comments from circa 600 responders. Following the consultation, the Procedure for the CAA to review the classification of airspace (CAP 1991) was developed and that process details a number of filters identifying what is in and out of scope for review under this process. These are:

- Airspace contained within a current Airspace Change Proposal (ACP) or has recently been part of an ACP.
- Airspace where a change might have a detrimental impact on military operations.
- Airspace where a change might have an operational or environmental impact.
- Airspace which was part of a previous review.

Most airspace volumes identified during that consultation were rendered out of scope by the filters set out above and most were submitted with limited supporting evidence. Following this, and in order to gain maximum value from the information and insight received via that consultation, we have done the following:

- Consultation comments have been passed on to all airports or Airspace Control Authorities (ACAs) where their airspace was mentioned for consideration; this included where terminal airspace and airways were mentioned, passing comments on to the en-route section of National Air Traffic Services (NERL). Where the airspace design within those ACPs is still in the formative stages (i.e. where the ACP is currently in stages 1-3 of the CAP 1616 process or the equivalent CAP 725 process), the CAA expects the change sponsors to consider and respond to the insight provided and to demonstrate this in their final submission to the CAA.
- Retained the responses for future reference so that when we move to the region that they relate to, they can be used as part of our information gathering process.

#### **14. What is the upper vertical limit of your review?**

The structure and use of airspace above 19,500ft (FL195) in the UK is dramatically different to the airspace below and is designed for a completely different operational environment, primarily en-route commercial aircraft. The use of the airspace below this level is more mixed and varied. Generally, due to requirements to carry oxygen above 10,000ft (FL100), most sport and recreational General Aviation takes place below this level. Although CAP 1991 does not state a vertical limit, for these reasons our focus will largely be on airspace below FL195 and, in particular, below FL100.

#### **15. Much of the airspace in this region could be filtered out according to your process, in that case, what are you likely to achieve?**

It will be the case that airspace volumes will be rendered out of scope by our filters. However, whilst this means the airspace classification review procedure may not be appropriate, it does not necessarily mean that our work will end there. Having gained valuable insight and intelligence as to how the airspace works, we can examine whether there are other changes, other than to the airspace classification, that can be made, in conjunction with the airspace control authority, that might facilitate better access to airspace. We will also publish our findings more widely to enable the insight to be shared both internally and externally.

#### **16. In following the CAP 1991 process, what work is required from Airspace Control Authorities?**

One of the new elements contained within the airspace classification review process is that it creates the option for the CAA, via the Airspace Classification Review team, to become the “change sponsor” and as such the team will undertake the majority of the work associated with the role of “change sponsor”. However, where there is a proposed amendment to the classification, the airspace control authority (ACA) will be responsible for the safe operation of that airspace following the change and so they will need to own the safety case and implement any operational changes.

**17. Can you compel or direct an Airspace Control Authority (ACA) to make a change?**

Central to our approach is cooperation and collaboration between the CAA and stakeholders. It should be the case that the benefit of any change that is recommended can be seen and supported by all parties involved in executing that change.

In the unlikely and undesirable event that there is a requirement to compel change it can be achieved through the Air Traffic Management and Unmanned Aircraft Bill 2021 which, in June 2021, became an Act of Parliament.

The Act gives the Secretary of State powers to direct a person involved with Airspace Change (Air Navigation Service Provider, Airport Operator etc) to progress an Airspace Change Proposal, and also to direct a person to co-operate in an Airspace Change Proposal, as long as this direction assists in the delivery of the CAA's Airspace Modernisation Strategy (AMS).

The Airspace Classification Review forms an important part of the AMS, and it is therefore the Department for Transport's (DfT) published position that these powers are proportionate and justified to be used in relation to the Airspace Classification task.

The CAA has previously stated that it currently only intends to use these powers to support airspace change being delivered through the Airspace Masterplan. We may choose to extend this reach to incorporate this work if cooperation is not forthcoming. However, as stated, our approach is one of cooperation and collaboration, and we would only seek to use this power as a last resort option.

**18. When amendments are made, will they be delivered through a separate Airspace Change Proposal (ACP) under the CAP 1616 process?**

The Airspace Classification Review team will primarily work to CAP 1991 which, although consistent with CAP 1616, is a different process with different requirements and time scales. These differences mean that the CAP 1991 process can be more expeditious than CAP 1616.

However, because of this there are limitations on the scale of changes that can be made. For example, where a change is identified that would have the potential to alter commercial tracks over the ground such as those made to arrival or departure routings, or where there may be a significant environmental impact, the requirement to undertake a detailed impact analysis of different design options and to consult stakeholders does not fit with CAP 1991. In this case the proposal would better suit a CAP 1616 application. Another example includes changes that would result in permanent planned redistribution of traffic (PPR).

**19. If the CAA is both proposing the airspace change and approving it, how can we be sure that the process is properly followed?**

The Airspace Classification Review team, who will make any recommendation for change, and Airspace Regulation, who approve any change, have worked extensively to create a process which enables them to interact in a way which keeps the decision-making function separate from the development of the final submission. It enables them to exchange information in a way that reflects the relationship that currently exists between the CAA's Airspace Regulation department and an external Change Sponsor undertaking an ACP, including respecting any boundaries that must exist between them.

**20. When will you start to look at your next region and how will it be chosen?**

At this stage of our work, we cannot say exactly when we will start to look at our next region. This is because, until we reach a point when we have an in-depth understanding of our current region and determine whether there is potential for changes to be made, and the scale of such changes, it is not clear how much work remains. We anticipate selecting and notifying where our next region will be as we approach the final “amend” phase of work in our current region.

In order to determine where our next region will be, we will be using information from the December 2019 – March 2020 consultation, input from groups such as Local Airspace Infringement Teams (LAITs), Airspace Engagement Group (AEG), Airspace Infringement Working Group (AIWG), airspace users and internal sources. If you have information relating to an area of airspace you are invited to submit it to us as described in question 8.

**21. Where do I find out more about the work the Airspace Classification Review team is doing?**

Information relating to the current workstreams of the team can be found on our dedicated area of the CAA’s website. This will include details of any engagement sessions and/or consultations that are being run as part of our work.

**Civil Aviation Authority  
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