



Airspace Classification Review – Cotswold Region

Additional information on our Approach

1. The purpose of this report and how it differs from the Initial Report published in August 2021

This report is our draft report into the Cotswold Region. It sets out a comprehensive picture of our findings to date into airspace use, informed by engagement with stakeholders. It builds on the factual information gathered and presented in the Initial Report, by bringing in feedback from a separate targeted survey, details of our own analysis into the survey comments, and the feedback received from airspace control authorities.

The report contains our initial plan of volumes of airspace which we propose to take forward to the amend stage of this procedure and our rationale for excluding certain volumes for review, as well as our other findings and recommendations. We are now seeking feedback to determine whether we have missed, misunderstood or misinterpreted any of our findings. The feedback will be used to inform our Final Report into the Cotswold Region and our Final Plan of airspace volumes to take to the amend phase.

2. How we identified the initial plan of airspace volumes to take forward to the amend phase

The Cotswold Region presented our team with over 70 individual airspace structures, including but not limited to 48 control areas (CTAs), 3 control zones (CTRs), 16 aerodrome traffic zones (ATZs), 5 Restricted Areas, and 4 Danger Areas. We have gathered various sources of information to help apprise the team's understanding of how the airspace is currently being used. Ultimately this has helped us identify and target the individual airspace volumes listed in the report, that we are able to investigate further through the airspace classification review procedure and have the potential to be taken forward into the amend phase of our process.

At the beginning of our task, we had already collated the responses (within the Cotswold Region) from the CAA's legacy 2019-2020 consultation which asked respondees to identify controlled airspace volumes where a classification could be amended to better reflect the needs of all airspace users. In August 2021, we released a factual report on the Cotswold Region (CAP 2235), along with two workshop sessions and an accompanying engagement survey which invited feedback from stakeholders operating in the Cotswold Region.

With the responses from the survey in mind, we used our Airspace Analyser Tool to conduct analysis on recent historical traffic movements across the region, and to explore potential

correlations between the insight from the survey, and the analysis we were conducting. We have also been using the Airspace Analyser Tool to help develop an understanding of who is using the airspace, and how the airspace is being used. We have held discussions with airspace control authorities across the region and have shared our findings as part of our wider engagement exercise.

3. Our reasons for excluding volumes of airspace not suitable for the amend phase of our process

Having gathered all the information required, conducted analysis, and shared this with stakeholders and airspace control authorities across the region, we started to identify which volumes have the potential to be taken through to the amend phase of our process.

In our report we have listed the filters set out in CAP 1991 which effectively remove airspace volume proposals that are not appropriate for this procedure for amending airspace classification. In particular, we have highlighted the airspace volumes that have been filtered out due to an ongoing or recent airspace change proposal (ACP). We acknowledge that the ACP filter does take out a significant number of airspace volumes from our process. However, the ACP process delivered through CAP 1616, is complex involving a lot of analysis, investigation, and significant levels of engagement with relevant stakeholders. Any involvement from the Airspace Classification Review team into an ongoing ACP could undermine the work already carried out within it.

After an ACP has been implemented, there is a phase known as the Post Implementation Review (PIR), 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 be appropriate for us to initiate a review of airspace classification while this review is underway, and the impact of the airspace change is not yet known.

4. When we will consult

We have engaged extensively through the Cotswold Region review process in developing our Initial Plan. Given the scale of that engagement, the involvement of key stakeholder groups throughout the process to date and the fact that we have previously conducted a survey on our initial investigative report, it is not proportionate to formally consult on our findings. Instead, we are now seeking feedback on our findings to determine whether we have missed, misrepresented, or misunderstood anything.

When we enter the amend process on our Final Plan of volumes, we will consult formally on each volume and any proposed changes to its airspace classification.

5. How this feedback differs from an Airspace Change Proposal (ACP) consultation

The CAA's airspace change process, detailed in CAP1616, is separate from its procedure to review the classification of airspace in the UK (CAP 1991). In the latter case it is the CAA who act as change sponsors, acting in the interests of all airspace users.

We are aware that there are a high volume of ACPs underway in this region and that the Change Sponsors of these ACPs will also be engaging with their stakeholders. CAP 1616 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 ACP the information necessary to move their process forward, informed by stakeholder insight on their proposals,

but this information is specific to them and any changes they intend to make. As such, the information gathered may not be appropriate for use by another party. However, we have spoken to relevant airspace control authorities as part of our review to gain a better understanding of their stakeholders' views.

As our process matures within a region, we too will be formally consulting and seeking responses to our specific amend proposals. Whilst we appreciate that this does involve an amount of potentially duplicated input from contributors it is a necessary part of ensuring people can have their say in a relevant and timely manner.

We have, and will continue to, conducted informal 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.

6. Please continue to provide us with any information relating to UK airspace

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 airspace access and 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 and/or consultations can be found on our web page here: [Airspace classification | Civil Aviation Authority \(caa.co.uk\)](#). If we are not running any current sessions, please see the next bullet point.
- 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 share your findings with us using our email address: airspace.classification@caa.co.uk. Such information could contain valuable insight that could inform where we choose to review in our next review period. This information will be collated with other information received and will be used to help inform our decisions. Details are again on our webpage.

7. Our powers to 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 for Transport powers to direct a person involved with airspace change (Air Navigation Service Provider, Airport Operator) to progress an ACP, and also to direct a person to co-operate in an ACP, 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](#) developed by the Airspace Change Organising Group (ACOG). 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.

8. Our final submission will be subject to the same degree of scrutiny as other Change Sponsors

The CAA's Airspace Classification Review team, which will make any recommendation for change, and its Airspace Regulation team, which 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.

In both cases the submissions are required to demonstrate that the final proposals follow the CAA's decision criteria set out in Appendix G of CAP 1616, including the requirement to meet the demonstrate alignment with section 70 of the Transport Act 2020¹.

9. How we will amend the airspace volumes identified in the report

It is important to stress that our findings in this report represent our initial plan of airspace volumes that we believe have the potential to be taken forward into the amend phase of our process, as well as volumes where changes could be made through other mechanisms. This is not our final plan of volumes to take through to the amend phase: that plan will be informed by the feedback we receive to our Cotswold Review report.

We have recognised in our report that there are some airspace volumes where a potential to make an improvement has been identified, but which will not be addressed via the CAP 1991 process. This is because there exist alternative processes to action these changes. Where that is the case, we have identified how these should be addressed and by whom.

Our Initial Plan therefore splits airspace volumes into two sections. The first section lists the airspace volumes that could potentially be put through the amend phase of CAP 1991. Following feedback to our report, the airspace volumes listed here will be investigated further to determine whether a change to the airspace classification is feasible, and how this would be achieved. We will then consult on the possible options for any amendment to the airspace classification before submitting our final proposal to Airspace Regulation for decision.

The second section lists airspace volumes/structures, where a positive change could be achieved through another process and/or simply gathering stakeholder feedback. There are existing established CAA policies which may be better placed to deal with the non-airspace classification changes, such as the dis-establishment of restricted areas which would normally be dealt with under the existing CAP 1616 process as a Level 0 change.

¹ [Transport Act 2020 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

10. We are now considering what region to look at next

We continue to engage with stakeholders and gather intelligence from a wide range of sources on airspace use, throughout the UK in preparation for future reviews. This intelligence will be analysed in detail following the launch of our next review as part of the consider phase. The launch of our next review will be publicised widely, and we look forward to working with stakeholders.

Civil Aviation Authority
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