

# CAP1616 Review: Consultation Guidance and Options Document

CAP2492

A large, abstract graphic consisting of overlapping blue and purple shapes. It features a light blue trapezoidal shape on the left, a darker blue trapezoidal shape on the right, and a purple-to-blue gradient shape at the bottom right corner.

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Civil Aviation Authority  
Aviation House  
Beehive Ring Road  
Crawley  
West Sussex  
RH6 0YR

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# Contents

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<b>Contents .....</b>	<b>3</b>
<b>Foreword.....</b>	<b>6</b>
<b>1. Background .....</b>	<b>7</b>
1.1 What is the airspace change process? .....	7
1.2 History of CAP1616.....	7
1.3 CAP1616 Review – Objective and Scope .....	8
1.4 How have we presented our proposals in this document? .....	8
1.5 Who is this document for? .....	9
1.6 How should I use it? .....	9
1.7 How can I have my say? .....	9
1.8 How will responses be managed?.....	10
1.9 What are the dates for consultation?.....	10
1.10 What should I do if I need this document in another format and how to get in touch?10	
<b>2. Structure of CAP1616 .....</b>	<b>12</b>
2.1 Introduction.....	12
2.2 High-level proposal: simplify the structure of CAP1616 .....	12
Option 1: Produce separate publication(s) for related guidance .....	12
Option 2: Produce separate publications for different parts of CAP1616.....	13
Option 3: Create distinct sections within CAP1616 for different types of ACP or by scaling levels .....	13
Option 4: Rename Parts.....	14
Option 5: Do nothing .....	14
2.3 Rejected high-level proposals .....	14
<b>3. Scaling Levels: Proportionate Scaling of Assessment .....</b>	<b>16</b>
3.1 Introduction.....	16
3.4 Rejected high-level proposals .....	19
<b>4. Stages, Steps, and Gateways .....</b>	<b>21</b>
4.1 Introduction.....	21
4.2 Part 1: Proposals related to what happens within the stages and steps .....	23

4.2.1	High-level proposal: Review/Clarify DP requirements.....	23
4.2.2	High-level proposal: DPs, design options and/or options appraisal requirements	25
4.2.3	High-level proposal: Remove requirement to develop a ‘comprehensive list’ of design options which includes ‘radical options’.....	25
4.2.4	High-level proposal: Review stakeholder engagement requirements on Stage 2 (Develop & Assess) design options.....	25
4.2.5	High-level proposal: Provision of process checklists for each stage.....	26
4.3	Rejected high-level proposals .....	26
4.4.	Part 2: Proposals related to modification of ACP Stages, Steps, and Gateways ...	27
4.4.1	High-level proposal: Review / Modify ACP Stages, Steps, and Gateways .....	27
4.5	High-level proposal: Consolidate the Options Appraisal requirements for certain ACPs	37
4.6	High-level proposal: Review CAP1616 Stage flowcharts.....	37
4.8	Rejected high-level proposals .....	37
<b>5.</b>	<b>Engagement, Consultation and Communications .....</b>	<b>39</b>
5.1	Introduction.....	39
5.2	High-level proposal: Establish dedicated CAA point of contact for ACP-related enquiries	40
5.3	High-level proposal: Review the ICCAN toolkit .....	40
5.4	High-level proposal: Categorisation of consultation responses.....	40
5.5	High-level proposal: Remove any reference to 12-weeks being the ‘accepted standard’ for consultation.....	41
5.6	High-level proposal: Transfer the responsibility of moderating/publishing consultation responses from CAA to change sponsor.....	41
5.7	High-level proposal: Better use of airspace change portal/CAA website for related guidance.....	42
5.8	Rejected high-level proposals .....	42
<b>6.</b>	<b>Clarity .....</b>	<b>44</b>
6.1	Introduction.....	44
6.2	High-level proposal: Clarify assessment requirements .....	46
6.3	High level proposal: Introduction of guidance meetings at key points in the airspace change process .....	48
6.4	High level proposal: Requirement for change sponsor-led briefing at point of submission (Gateways and Stage 4 Update and Submit).....	48
6.5	High level proposal: Review of guidance contained within Stage 6 (Implement) ...	49

6.6	High level proposal: Provision of airspace change scope flowchart.....	49
6.7	High level proposal: Clarify decision criteria.....	49
6.8	Rejected high-level proposals .....	50
<b>7.</b>	<b>Instrument Flight Procedures (IFP) .....</b>	<b>52</b>
7.1	Introduction.....	52
7.2	High-level proposal: Clarify IFP design requirements / expectations .....	52
7.3	Rejected high-level proposals .....	55
<b>8.</b>	<b>Temporary Airspace Changes / Airspace Trials.....</b>	<b>56</b>
8.1	Introduction.....	56
8.2	High-level proposal: Remove references to ‘consultation’ within the temporary airspace change process .....	57
8.3	High-level proposal: Criteria for determining whether communities are affected and requirement to inform them accordingly .....	57
8.4	High-level proposal: Broadening noise assessment requirements for a temporary ACP/airspace trial where a permanent ACP is likely to follow .....	58
8.5	Rejected high-level proposals .....	58
<b>9.</b>	<b>Next Steps.....</b>	<b>60</b>
	<b>APPENDIX A - Glossary .....</b>	<b>61</b>
	<b>APPENDIX B - Consolidated list of consultation questions .....</b>	<b>67</b>
	<b>APPENDIX C Stage 2 – Clarification on the Regulatory Requirements and Expectations document.....</b>	<b>Error! Bookmark not defined.</b>

## Foreword

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The CAP1616<sup>1</sup> airspace change process was introduced in 2018, following a comprehensive independent review of its predecessor, CAP725<sup>2</sup>. Conscious of the new requirements introduced through CAP1616, the CAA committed to undertake a review of the new airspace change process three years after its implementation. The review gives us the opportunity to reflect on the lessons learned following the implementation of CAP1616 and make further improvements to the airspace change process.

This document is a formal consultation setting out the detail on our proposals to modify CAP1616. The airspace change process can have an impact on many diverse stakeholders. We welcome responses from all our stakeholders, including members of the public. The feedback we receive may influence and lead to changes being made to the high-level proposals and detailed options contained within this consultation document.

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<sup>1</sup> [CAP1616: Airspace Change: Guidance on the regulatory process for changing the notified airspace design and planned and permanent redistribution of air traffic, and on providing airspace information](#)

<sup>2</sup> [CAP725: CAA Guidance on the Application of the Airspace Change Process](#)

# 1. Background

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## 1.1 What is the airspace change process?

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Changes to the design of UK airspace are proposed by a change sponsor. Sponsors of airspace change could typically be an airport operator, air navigation service provider, government agencies (e.g. Ministry of Defence [MoD]), Unmanned Aircraft System (UAS) operator or spaceport. This is not an exhaustive list, and it may change. Change sponsors are required to follow the airspace change process.

The airspace change process is structured, comprising of different stages, steps, and gateways, depending on the type of airspace change that has been proposed.

There are several stakeholders involved in the airspace change process:

- The **Government** sets the legal framework and statutory objectives for the CAA, outlining our functions and responsibilities. For certain types of airspace change proposal (ACP), the Secretary of State for Transport may also decide to ‘call-in’ the decision-making responsibilities instead of the CAA.
- The **CAA** is the airspace regulator and primary decision maker. We are responsible for developing and publishing the airspace change process, deciding whether to approve ACPs to airspace design and providing related guidance.
- The **change sponsor** is responsible for developing the ACP in accordance with the requirements of the CAA’s airspace change process and relevant Government guidance.
- **Stakeholders** who may be impacted by airspace change have the opportunity to influence the development of an ACP through their engagement with the change sponsor.

## 1.2 History of CAP1616

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The CAA commissioned an independent review of the previous airspace change process (known as CAP725) in 2015. The objective of the review was to ensure that the airspace change process was fair, proportionate, consistent with legal requirements and that it met modern regulatory decision-making standards.

Following the conclusion of the independent review and publication of a related report<sup>3</sup>, we developed a new airspace change process (CAP1616) that was based on many of the recommendations that had been made.

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<sup>3</sup> [CAP1356: Helios Report: Independent Review of the CAA's Airspace Change Process](#)

CAP1616 was introduced in January 2018, following two rounds of consultation on our proposals to modify the airspace change process.

### 1.3 CAP1616 Review – Objective and Scope

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We made a commitment to review the CAP1616 airspace change process three years after its implementation. The objective of our review is to produce an updated version of CAP1616 which provides a more proportionate and tailored approach to airspace change. At the same time, risks and impacts will continue to be addressed, understood, and transparently engaged on for the benefit of all those who use and are affected by airspace changes.

We will achieve this objective by reflecting on lessons learned since the introduction of CAP1616, where proposed modifications will be informed by stakeholder feedback, our own experiences of the airspace change process, and emergent policy requirements.

We engaged proactively and transparently with stakeholders, reflecting, and acting on their combined insight to support the development of a more proportionate regulatory process. The feedback that we have received has directly influenced the themes and related high-level proposals and options that are presented within this consultation document.

The scope of our review and this consultation is focussed on the airspace change process for permanent and temporary ACPs, as well as airspace trials (Part 1 of CAP1616). This consultation **does not cover** the following:

- The airspace change process for planned and permanent redistribution (PPR) of air traffic proposals (Part 2 of CAP1616).
- The airspace change process for temporary PPR proposals (Part 2a of CAP1616)
- The requirement to provide airspace information and transparency related to airspace use and aircraft movements (Part 3 of CAP1616)

### 1.4 How have we presented our proposals in this document?

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We present several themes within this consultation document, and these have evolved from our analysis of stakeholder feedback received during our engagement activities. These are: Structure of CAP1616, Scalability of Levels, Stages, Steps, and Gateways, Engagement, Consultation and Communications, Clarity, Instrument Flight Procedures and Temporary Airspace Changes/Airspace Trials.

When considering each theme, we initially developed ‘high-level proposals’ before developing specific options to address them. The number of high-level proposals and options varies across each theme. These are presented below, and we would welcome your feedback on these. We also detail the actions that we are committed to doing in response to each theme.



## 1.5 Who is this document for?

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This document is for stakeholders with an interest in changes that impact airspace, including the following:

- Change sponsors of ACPs.
- Communities affected by aviation noise or other environmental impacts, their representatives, councils and other elected representatives, bodies with an interest in aviation's environmental impact
- Service providers such as air traffic control, airports, airspace and Instrument Flight Procedure (IFP) design organisations
- Airspace users, including airlines and other commercial operators, general aviation, and the Ministry of Defence
- The users of air transport services, i.e., passengers and air freight/cargo providers and customers.
- All other interested parties

## 1.6 How should I use it?

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You should use this document before completing the corresponding survey. The survey's questions are largely based on the options discussed in this document. It will help our stakeholders understand why we are putting these options forward and why we have chosen not to take certain options forward to consultation. Even with those options we have chosen not to take forward, we continue to listen and gather feedback on them. A copy of the survey can also be found at Appendix B to this document.

## 1.7 How can I have my say?

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You can submit your response to this consultation by completing our online survey which can be accessed via our consultation hub (<https://consultations.caa.co.uk/safety-and-airspace-regulation-group/acp2022>) or by using the QR code below:



If you are unable to submit a response online, postal responses should be addressed to:

Airspace Regulation (Ref. CAP1616 Review Consultation)  
CAA Safety and Airspace Regulation Group  
Aviation House  
Beehive Ring Road  
Crawley  
West Sussex

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We also intend to facilitate some virtual sessions via Microsoft Teams during which time members of the Airspace Regulation team will be available to discuss the high-level proposals and options presented in this consultation document. The sessions will take place approximately half-way through the consultation. Further details will be published on the consultation hub (<https://consultations.caa.co.uk/safety-and-airspace-regulation-group/acp2022>) once the arrangements have been finalised.

## 1.8 How will responses be managed?

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Responses will be summarised and themed and analysed in a consultation report. Responses, including any postal responses received, will be moderated by the CAA, and uploaded to the CAA's Citizen Space Consultation Hub. We will use moderation in order to remove any unsuitable content, but not as a general means of censoring or filtering responses. We will then consider the results of our analysis and decide what updates should be made to the next version of CAP1616.

## 1.9 What are the dates for consultation?

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The consultation will run from Thursday 5<sup>th</sup> January 2023 to Sunday 5<sup>th</sup> March 2023. This represents a duration of 8 weeks and 3 days. We will closely monitor and track responses and will take proactive steps to distribute reminders at key points throughout the duration of the consultation.

## 1.10 What should I do if I need this document in another format and how to get in touch?

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Should you require this document in another format please contact the CAA by email to [airspace.policy@caa.co.uk](mailto:airspace.policy@caa.co.uk) or by post to the following address:

Airspace Regulation (Ref. CAP1616 Review Consultation)  
CAA Safety and Airspace Regulation Group  
Aviation House  
Beehive Ring Road  
Crawley  
West Sussex  
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Whilst we will endeavour to accommodate any such request, each will need to be considered on an individual basis.

## 1.11 Enquiries or complaints regarding the process of consultation

Should you wish to make an enquiry or complaint about the conduct of this consultation process, please contact the CAA by email to [airspace.policy@caa.co.uk](mailto:airspace.policy@caa.co.uk) or by post to the following address:

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## 1.12 Introduction of themes within this document

The following sections will introduce the theme and list the high-level proposals and options related to it. They will also cover the high-level proposals that have been rejected, along with our rationale explaining why. The first theme to be presented concerns the 'Structure of CAP1616'.

## 2. Structure of CAP1616

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### 2.1 Introduction

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CAP1616 is a large publication, and this theme relates to the order and navigation of the document and its appendices. Internal and external stakeholders suggested that there was a need to provide clearer separation between the regulatory requirements and related guidance. Repetition, inconsistency, and the fragmented nature of the document were often cited as a cause of confusion for the reader. When producing the next version of CAP1616, we will endeavour to ensure that:

- Clearer separation between the regulatory requirements and related guidance is provided; and
- Any inconsistencies are removed, and the amount of repetition is reduced.

We will also incorporate the contents of CAP1618<sup>4</sup> into the next version of CAP1616. CAP1618 covers changes related to unusual aerial activities (e.g., aerial sporting or activities dangerous nature) where regulatory oversight from an airspace design perspective is not required. As a result of this change, organisations wishing to sponsor the activities that currently fall within scope of CAP1618 will be required to submit a Statement of Need prior to their request being actioned. This will ensure that any such requests are tracked and actioned accordingly, whilst ensuring that the CAA provides appropriate guidance on the requirements of timely coordination, notification, and publication of the activity.

### 2.2 High-level proposal: simplify the structure of CAP1616

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Stakeholders felt that the current document structure is complicated to follow. They felt that it includes content that could be better integrated elsewhere in the publication, or even published separately.

#### **Option 1: Produce separate publication(s) for related guidance**

As highlighted above, there is a desire to separate the regulatory requirements of the airspace change process from the related guidance. We could focus the content of CAP1616 specifically on detailing the regulatory requirements (i.e. the things that 'must' be done) and produce separate publications which contain related guidance (i.e. how it 'could' or 'should' be done).

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<sup>4</sup> [CAP1618 Airspace Design - unusual aerial activities published in the AIP.pdf \(caa.co.uk\)](#)

If we were to progress with this option, it would **benefit** the reader by reducing the volume of CAP1616 and providing clearer separation, while also making it easier for the CAA to update the separate and smaller publications. In terms of **identified impacts**, this option fails to address stakeholder concerns related to ‘fragmentation’, whilst also creating more publications for stakeholders to be aware of and for the CAA to manage.

## Option 2: Produce separate publications for different parts of CAP1616

CAP1616 includes several ‘parts’, making it a large publication. We could focus the content of CAP1616 specifically on detailing the regulatory requirements for permanent ACPs, and produce separate publications for the following parts:

- Part 1a – Temporary changes to the notified airspace design
- Part 1b – Airspace Trials
- Part 1c – Airspace change process for RNP Instrument Approach Procedures (IAPs) without an Approach Control Service
- Part 2 – PPR: planned and permanent redistribution of air traffic
- Part 2a – Temporary PPR changes
- Part 3 – Airspace information: transparency about airspace use and aircraft movements

While the scope of this review was limited to Part 1 of CAP1616, this option does **benefit** the reader, as it would significantly reduce and simplify the content of the publication. The **identified impacts** are similar to Option 1, in that it would create more publications for stakeholders to be aware of and for the CAA to manage and could result in duplication of content across each of the documents.

## Option 3: Create distinct sections within CAP1616 for different types of ACP or by scaling levels

There are several points within CAP1616 at which the reader is referenced to the other sections of the publications (for e.g., the various appendices) and/or separate publications completely. This means the reader has to ‘jump’ from one section/document to another, which can create confusion/frustration. We could produce distinct sections, including self-contained regulatory requirements and related guidance for different types or scaling levels (as detailed in Table 2 of CAP1616) of ACP.

This option would **benefit** the reader by consolidating information into a single section within CAP1616. Depending on the type/level of ACP, the reader would be referred to the relevant section of CAP1616, within which they would find everything they need to know about the airspace change process applicable to their ACP. Whilst this would address concerns related to the ‘fragmented’ nature of CAP1616, an **identified impact** for this option would be that it has the potential to add a considerable amount of content to CAP1616. It would be necessary to duplicate some of the information across the distinct sections, potentially increasing the overall size of CAP1616.

## Option 4: Rename Parts

CAP1616 includes several 'parts' to the publication, each of which is currently titled by including a number and text. We could easily remove the numbering so that each part of the document simply includes a title. Some illustrative examples have been provided below:

- 'Part 1: The airspace change process (permanent changes to the notified airspace design)' would become 'Permanent ACPs'.
- 'Part 1a: Temporary changes to the notified airspace design' would become 'Temporary ACPs'.

Modifying CAP1616 in this way would **benefit** the reader by providing a clearer, more obvious title to each part of the document, whilst also removing any potential confusion with the numbering that applies to the scaling level and stages, steps of the airspace change process. There are **no identified impacts** with this option. Although it represents a simple administrative update, we would welcome your views on this option.

## Option 5: Do nothing

We could maintain the current structure of CAP1616, while making updates to the content to address other feedback themes as proposed elsewhere within this document. However, there is **no benefit** to this option, as it would fail to address the feedback that we had received linked to this theme. In terms of **identified impacts**, those described above would continue to be experienced. N

## 2.3 Rejected high-level proposals

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The following high-level proposals were suggested in response to the 'Document Structure' theme. Having considered each one carefully, we determined not to progress these, and our rationale for doing so is set out below.

### Make CAP1616 the single publication for all types of ACP

Stakeholders noted that the CAA published separate Airspace Policy Statements, some of which overlapped with the requirements of the airspace change process and/or detailed a scaled-down version of it (e.g., Aerodrome Traffic Zone Policy Statement). It was suggested that CAP1616 should be the sole publication for detailing the regulatory requirements for all types of ACP and that related guidance on the airspace change process should not be contained on the separate Policy Statements. We do not intend to progress this proposal on the basis that it has the potential to add a considerable amount of content to CAP1616, thereby potentially increasing the overall size of it. It would also require significant amendments to pre-existing Policy Statements, some of which are not owned by the Airspace Regulation team. However, we will develop guidance on how and where the requirements of the airspace change process may be scaled, as we recognise that this is not very well defined within the current version of CAP1616.

## **Produce separate documents for different stakeholders**

The airspace change process affects a broad range of stakeholders, each of which have their own unique requirements and expectations. As a single publication, CAP1616 is required to balance these and provide a common understanding of the airspace change process and related guidance across a wide span of stakeholder expertise and experience. It was suggested that we should consider producing separate publications for different stakeholder categories, with the content tailored accordingly so that it better meets their unique requirements. We do not intend to progress this proposal as it would create more publications for stakeholders to be aware of and for the CAA to manage.

## 3. Scaling Levels: Proportionate Scaling of Assessment

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### 3.1 Introduction

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The airspace change process currently has four scaling levels reflecting the characteristics of the change. These scaling levels are in part based on the altitude and area in which the changes occur and, amongst other things, influence the environmental factors that require assessing and the extent of the consultation requirements. The CAA is under a legal duty not to apply the process in a way that cannot accommodate any flexibility. We therefore consider further scaling when there is a good reason, and it is proportionate to do so. Proportionate scaling ensures that change sponsors are not deterred by unduly onerous requirements. For example, a Level 1 change requires several noise metrics to be assessed, however, if a change sponsor believes that a quantitative assessment using the required metrics will result in no difference in the outputs for a metric then the assessment may be scaled down and a qualitative assessment may be used instead, and thus ensuring the level of detail is proportionate to the likely impact.

We intend to review the Statement of Need form and will consider making amendments that will help capture a change sponsor's rationale to seek a scaled-down version of the airspace change process. We will also ensure appropriate measures are established to provide more certainty in relation to the scaling discussions that take place during the initial stages of the airspace change process, particularly at the Assessment Meeting.

However, we know from feedback that scaling is not very well defined within CAP1616. As a result, we will develop guidance on how and where the requirements of the airspace change process may be scaled. We are also proposing the following changes.

### 3.2 High-Level Proposal: Review scaling levels for ACPs

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#### Option 1: Modify the scaling levels

We could make some modifications to the scaling levels and the associated high-level definition so that they read as follows:

- Level 1: A change to the notified airspace design that does have the potential to alter traffic patterns below 7,000 feet over an inhabited area, with high impacts on aviation and/or non-aviation stakeholders. An example would be a change to departure/arrival routes at an airport and/or airspace below 7,000 feet. The CAA decision-maker for Level 1's would be the Group Director Safety and Airspace Regulation or Head of Airspace, ATM and Aerodromes.



- Level 2: A change to the notified airspace design that does not have the potential to alter traffic patterns below 7,000 feet over an inhabited area, with medium to low impacts on aviation and/or non-aviation stakeholders. An example would be a change to Air Traffic Service (ATS) routes and/or airspace above 7,000 feet. The CAA decision-maker for Level 2's would be the Group Director Safety and Airspace Regulation, Head of Airspace, ATM and Aerodromes or Manager Airspace Regulation.
- Level 3: A change to the notified airspace design that does not have the potential to alter traffic patterns below or above 7,000 feet over an inhabited area, with low to negligible impacts on both aviation and non-aviation stakeholders. An example would be a change that reflects the current use of airspace concerned and/or where the number of flights impacted is negligible. The CAA decision-maker for Level 3's would be the Group Director Safety and Airspace Regulation, Head of Airspace, ATM and Aerodromes, Manager Airspace Regulation or Principal Airspace Regulator.
- Level 0: Changes to nomenclature or qualifying remarks to the notified airspace design. An example would be a change to the name of significant points on a Lower or Upper ATS route. The CAA decision-maker for Level 0's would be the Group Director Safety and Airspace Regulation, Head of Airspace, ATM and Aerodromes, Manager Airspace Regulation, Principal Airspace Regulator or Airspace Regulator.

If we were to progress this option, it would simplify the presentation of the Levels and provide better alignment of the requirements of the airspace change process with the principles of the Government's altitude-based priorities. The altitude-based priorities state that changes below 7,000 feet should take into account local circumstances in the development of the airspace design, whilst placing a requirement on the CAA to ensure appropriate community engagement has been conducted by the change sponsor. The ability to scale the requirements of the airspace change process, irrespective of the scaling Level applied, would be retained.

As explained above, we are committed to clarifying how and when the airspace change process may be scaled. If this option were to be progressed, it would **benefit** all stakeholders by simplifying the scaling Levels that are utilised within the airspace change process, while also providing all stakeholders with a clearer understanding of how and where the airspace change process may be scaled for each of the proposed scaling Levels. We also believe that it would ensure that a proportionate regulatory process is applied to our oversight of ACPs.

In terms of **identified impacts**, this may introduce some confusion for in progress ACPs where a pre-existing scaling Level has been confirmed, but we would expect any impact to be negligible.

## Option 2: Extend the definition of Level 0

An alternative to Option 1 would be to retain Level 1 and Levels 2A/2B/2C as currently defined and extend the definition of Level 0 so that it covers changes that will have negligible impact. Minimal CAA discretion is needed to consider Level 0 ACPs and change sponsors are only required to complete Step 1A (Assess Requirement) before a regulatory decision is made. We recognise that some ACPs will have low to negligible impacts and therefore we could extend the definition of Level 0 to cover these types of ACP. An example would be a change that releases controlled airspace or where the number of flights impacted is negligible.

While this option is presented as an alternative to Option 1, it would deliver a similar **benefit** in terms of ensuring that the airspace change process is proportionate, and that the regulatory requirements are reflective of the anticipated impact of the ACP.

In terms of **identified impacts**, this may introduce some confusion for in progress ACPs where a pre-existing scaling Level has been confirmed, but we would expect any impact to be negligible.

## Option 3: Do nothing

The scaling levels could stay as they are and we could simply develop guidance on how and where the requirements of the airspace change process may be scaled. The **benefit** of this option is that those sponsors who are familiar with the process do not have to make any changes to their current practice. Although scaling can be applied at any point in the airspace change process, the **identified impact** of doing nothing could be that the scaling level for ACPs that have little, or no impact is not determined earlier on. This could cause more resource issues for change sponsors. In addition, stakeholders may continue to question the provisional scaling of an ACP until the end of Stage 2 (Develop & Assess) if evidence is not presented up front.

## 3.3 High-Level Proposal: Assessment of the Baseline

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### Option 1: Require the current-day scenario (baseline) to be fully described at Stage 1 (Define)

A baseline is required for all environmental assessments as it provides clarity on the incremental changes between a pre-implementation ('do nothing') scenario and a post-implementation scenario. For environmental assessments, this baseline will normally be based around the 'do nothing' scenario and reflects the current-day scenario but taking account of known or anticipated factors that might affect that baseline, for example a planned housing development or changes in traffic.

The current-day baseline is key to understanding the do nothing scenario. This current-day baseline represents today's impacts and is formed around the current-day airspace

situation and any geographical features pertaining to the potentially affected areas (potentially affected areas as identified on the CAA airspace change portal).

This option would mean that the current-day baseline is fully described earlier in the airspace change process. This does not place any additional requirement on the change sponsor as it is simply bringing forward work that must be done to an earlier stage in the airspace change process. This option is completely aligned with option 7 that is presented within Section 4.4.1 of the ‘Stages, Steps and Gateways’ chapter of this document.

A **benefit** of this proposal is that it helps the CAA understand current-day impacts and make decisions on when and how assessments can be scaled. Describing the current-day baseline at an earlier stage allows for the environmental assessments to follow a logical order, beginning with an understanding of today’s impacts upon which the identification and analysis of potential new impacts can be made through the different phases of options appraisal. By describing and characterising the local context earlier in the airspace change process, this option would also allow stakeholders to provide more meaningful responses to support the development of the DPs and subsequent design options.

This proposal would have an **impact** on the allocation of resource from a change sponsor perspective. They would need to ensure that relevant specialist resource(s) are utilised earlier on in the airspace change process, to support the development of the current-day scenario (baseline).

### Option 2: Do nothing

The requirement to fully describe and assess the current-day baseline could remain at Step 2B (Options Appraisal) of the airspace change process. There is **no benefit** to be gained through this option. The airspace change process would remain the same, which means that change sponsors would continue presenting their current day-baseline alongside their design options at the end of Stage 2. The **identified impact** of this is that sponsors miss an opportunity to firm up scaling and set up a sound rationale for a level earlier on in the process. Stakeholders will also miss the opportunity to make more informed representations earlier on in the process.

## 3.4 Rejected high-level proposals

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The following high-level proposals were suggested in response to the ‘Scaling Levels’ theme. Having considered each one carefully, we determined not to progress these, and our rationale for doing so is set out below.

## **Confirm scaling at the end of Stage 2 (Develop & Assess) and remove provisional Level**

We did consider the possibility of applying a provisional Level 1 status to all ACPs until the end of Stage 2 (Develop & Assess). At this point, the design options would have been developed and therefore the change sponsor would be in a position to provide a rationale along with supporting evidence to inform the appropriate scaling level. As ACPs vary greatly in terms of their size and complexity, we felt that it would be disproportionate to require them all to meet the same requirements in the early stages of the airspace change process and therefore we do not intend to progress this proposal.

## **All Level 2 ACPs are required to follow Level 2A or Level 2B/2C Environmental Requirements**

Level 2 ACPs are currently assigned one of three sub-levels (2A, 2B or 2C). These sub-levels are assigned depending on the nature of the change and will determine the assessment requirements. We contemplated standardising the environmental requirements for all Level 2 ACPs with those required for 2A or 2B/2C, irrespective of the sub-level assigned to it. This option was not progressed on the basis that we are proposing a separate option regarding the scaling Levels, whilst also being committed to providing clarification on how and where the airspace change process may be scaled.

## 4. Stages, Steps, and Gateways

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### 4.1 Introduction

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Feedback from internal and external stakeholders during our CAP1616 engagement activities requested clearer explanation of the stages, steps, and gateways and suggested that there were opportunities for simplification of them.

In recognition of stakeholders' wish for clearer explanation within CAP1616, we have identified some areas where the text could be revised.

In Stage 1 (Define), change sponsors are required to develop design principles (DPs) that are to be applied to the airspace change design. We plan to provide guidance on how to produce SMART DPs (Specific, Measurable, Achievable, Realistic and Time-bound) and insert best practise guidance regarding assigning priorities to each design principle using a rating of A – C where priority A is the highest, and C is the lowest. We have seen some change sponsors adopt this practice, particularly where feedback on prioritisation has been provided by stakeholders. This practice could continue to be used at the change sponsor's volition. We also plan to provide guidance on current requirements to take local context into consideration when developing DPs and more guidance on the role and purpose of DPs in determining trade-offs, for example regarding the minimisation of overflight or of night noise, and how this should be considered when engaging with stakeholders.

We considered consulting on an option to require change sponsors to include and explain the high-level criteria associated with their DPs, i.e., the criteria against which design options are tested. Our view is that the definition and meaning of DPs needs to be produced to provide clarity for stakeholders so that they can understand how the DPs will be used in Stage 2 (Develop & Assess). It would also ensure that change sponsors are mindful of formulating DPs that are specific, measurable, achievable, relevant and timebound (SMART). We will write into the airspace change process the requirement for change sponsors to define their DPs and explain the high-level criteria applicable to them.

Various suggestions were made regarding the merging, and/or removing of some stages, steps, and gateways. In Stage 3 (Consult), we propose merging Step 3B (Consultation Approval) with Step 3A (Consultation Preparation). In doing so we are not removing the requirement for change sponsors to present their consultation materials for assessment at the Stage 3 (Consult) gateway assessment meeting. All work currently required of the change sponsor will continue to be required. We are simply recognising that the labelling of this step is not required and a simplification of the presentation of the airspace change process can be achieved by merging Step 3B with Step 3A.

CAP1616 already contains guidance at Stage 5 (Decide) regarding CAA requests for supplementary information and technical corrections from change sponsors where an initial assessment reveals an area of potential weakness. We plan to include similar guidance regarding discussions between change sponsors and the CAA during the regulatory assessment window leading up to each gateway assessment meeting for Stages 1 (Define), 2 (Develop & Assess) and 3 (Consult) to address the scope and extent of such discussions. We will also ensure that the airspace change process requirements and expected outputs of each gateway are better reflected in the next version of CAP1616.

In this section we present consultation options that reflect the feedback received regarding the requirements of some of the stages, steps, and gateways alongside opportunities to merge and/or remove stages, steps, and gateways and we are interested in receiving your views on them.

## 4.2 Part 1: Proposals related to what happens within the stages and steps

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### 4.2.1 High-level proposal: Review/Clarify DP requirements

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During our CAP1616 review engagement activities, stakeholders told us that the purpose of DPs could be more clearly articulated, and they requested the provision of guidance and examples to clarify what constitute good DPs. Views were expressed that the current airspace change process does not adequately describe how DPs should be developed and utilised throughout CAP1616. It was suggested that the term Critical Success Factors (CSF), which is used in the Department for Transport's (DfT) Green Book on Appraisal and Evaluation, could be applied to those DPs which are given the highest priority. The Green Book (along with the DfT's transport analysis guidance WebTAG) is considered best practise in appraisal.

#### **Option 1: Inclusion of mandatory (core/required) and discretionary (optional/suggested) DPs**

This option proposes including DPs which are deemed mandatory for all ACPs (irrespective of their scaling level), and which are designated Critical Success Factors. Two examples of a mandatory DP could be:

- DP Safety – Safety is the highest priority. The ACP will maintain or improve safety.
- DP Policy - Must comply with all legislation, regulations, and directions from the Government.

Whilst it may be necessary to supplement the mandatory DPs for high impact ACPs (e.g., a change to departure/arrival routes at an airport and/or airspace below 7,000 feet), they could be solely used for ACPs that are determined to have a low to negligible impact (e.g., a change that reflects the current use of airspace concerned and/or where the number of flights impacted is negligible).

This option also suggests the provision of discretionary DPs which change sponsors may adopt and adapt as necessary depending on the nature of their own ACP. Examples of discretionary DPs might include:

- DP Economic (Fuel Performance) - The airspace will optimise network fuel performance
- DP Operational (Resilience) - The airspace will enable increased operational resilience

If we were to progress this option, it would **benefit** change sponsors in enabling some simplification and shortening of Stage 1 (Define) stakeholder engagement activity thus potentially improving its efficiency. This option would also help to achieve a level of consistency, which the CAA has found not to be always evident, between ACPs of the same level. This option could result in a shortening of the airspace change process for change sponsors. In terms of **identified impacts**, change sponsors will still be required to engage with stakeholders on their proposed DPs although stakeholders might have less opportunity to influence the drawing up of DPs through two-way engagement.

As well as asking you to provide us with feedback on this option regarding inclusion of mandatory and discretionary DPs, our consultation survey will also seek your views on the use of DPs in general.

## **Option 2: Requirement to test the DPs at each stage of the Options Appraisal**

This option entails re-iterating the need for change sponsors to test their DPs at each stage of Options Appraisal.

If this option were to be progressed, it would **benefit** stakeholders in the provision of more transparent identification of how each design option performs against the DPs. It would also **benefit** change sponsors by providing a framework against which design options can continue to be tested and would enable the discounting of design options in the latter stages of the airspace change process that no longer meet the DPs. Progressing this requirement would ensure that the design option progressed at the conclusion of the airspace change process is aligned with the DPs.

In terms of **identified impacts**, this option would require additional work by the change sponsor for the latter stages of the airspace change process.

## **Option 3: Do nothing**

This option proposes retaining the current requirements and guidance regarding DPs where change sponsors create, develop, and discuss their DPs with potentially impacted stakeholders. Whilst a **benefit** would be that all stakeholders continue to follow a process that is already familiar to them, we would not be addressing the feedback received linked to this theme.

In terms of **identified impacts**, there would be no potential reduction in the length of the current airspace change process at Stages 1 (Define) and 2 (Develop & Assess). There would not be an opportunity to address inconsistencies regarding DPs that are currently identified by the CAA across ACPs.

The **effect** of this would be that change sponsors would continue to draw up, develop and discuss their DPs with stakeholders in the same way that they currently do.



## 4.2.2 High-level proposal: DPs, design options and/or options appraisal requirements

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As explained above, we will be writing in the requirement for change sponsors to define their DPs and explain the high-level criteria applicable to them.

We are also interested in receiving your views on a high-level proposal to remove the requirement to develop DPs, design options and/or apply the options appraisal process for certain ACPs. We are keen to know which types of ACPs this requirement may apply to and also whether you agree with the proposal.

## 4.2.3 High-level proposal: Remove requirement to develop a 'comprehensive list' of design options which includes 'radical options'

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We are very aware of concerns related to the current requirement to develop a comprehensive list of options, which includes radical options to test parameters for feasible solutions. This requirement appears to be causing nugatory work and confusion for all stakeholders. We are proposing that the requirement should be to develop an initial list of realistic (i.e., sensible, or practical ideas that can actually be achieved) design options that is aligned with the objective as set out in the Statement of Need and the DPs that are subsequently developed. We would remove the requirement for the list to be 'comprehensive', whilst also removing the requirement for 'radical options' to be developed and considered. This would support the development of a more specific/targeted list of design options ahead of the options appraisal process. It will still be necessary to refine the initial list of design options, and therefore we would retain the requirement for each change sponsor to set out clearly why certain design options have been discounted from the initial list. So the list of design options should include the current-day scenario i.e., the baseline, the design options to be progressed as well as those that have been discounted. We would welcome your views on this proposal.

## 4.2.4 High-level proposal: Review stakeholder engagement requirements on Stage 2 (Develop & Assess) design options

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Conducting this review provides an opportunity to consider whether the stakeholder engagement required at Stage 2 (Develop & Assess) on design options should be retained. At present change sponsors are required to develop their first comprehensive list of options that address the change sponsor's statement of need and that they align with the DPs and test them with their stakeholder audience. This is to ensure that stakeholders are satisfied that the design options are aligned with the DPs and that the change sponsor has properly understood and accounted for any stakeholder concerns specifically relating to the design options. We are interested to receive your views on whether this requirement should be retained or removed.

### 4.2.5 High-level proposal: Provision of process checklists for each stage

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We propose providing change sponsors with a list of process requirements, separated by specialist regulatory area (economic, engagement and consultation, environmental, instrument flight planning and technical), that must be met at each stage of CAP1616. It would act as a checklist of those requirements that are assessed at each stage of the CAA's decision-making process. Change sponsors could be provided with a summary of pertinent requirements, satisfactory completion of which would result in the minimum expectations of the airspace change process being met. We would welcome receiving your views on this proposal.

### 4.3 Rejected high-level proposals

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No high-level proposals were rejected.

## 4.4. Part 2: Proposals related to modification of ACP Stages, Steps, and Gateways

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### 4.4.1 High-level proposal: Review / Modify ACP Stages, Steps, and Gateways

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Feedback from internal and external stakeholders suggested that there are opportunities to simplify the presentation of the airspace change process and make the requirements easier to understand by combining and/or removing some of the stages, steps, and gateways. This was caveated by the view that stages, steps, and gateways, and the requirements within them, should not be changed dramatically. In general, feedback was that the airspace change process is too long and onerous, whilst being complicated to follow. In terms of combining or removing stages, steps, and gateways some specific suggestions were made by stakeholders in our internal and external workshops. Within each of the options presented below, the actual requirements of the airspace change process will broadly remain the same. Irrespective of the options that we decide to progress (if any), we will ensure that the requirements of each stage, step, and gateway, including those related to Instrument Flight Procedures (IFPs) (see Section 8 below) are made clear within an updated CAP1616. We are interested in hearing your views on the proposed options to understand whether they would help remove confusion and make the airspace change process easier to understand and more logical to follow.

#### **Option 1: Remove Stage 1 gateway and move requirements into single gateway at end of Stage 2.**

This option involves the requirement for change sponsors to present their outputs from both Stage 1 (Define) and Stage 2 (Develop & Assess) of the airspace change process at a single gateway at the end of Stage 2. We have already accommodated requests from some change sponsors of small scale ACPs to consider their Stage 1 submission along with the submission for Stage 2 at a single gateway. We refer to this as a ‘multi-gateway’ submission, whereby progress to the next Stage is only permitted if the requirements of the proceeding gateway are satisfied. During our engagement activities, the ability to condense the gateway requirements through ‘multi-gateway’ submissions was welcomed by change sponsors and aviation consultancy firms, and it was felt this should be better reflected in CAP1616.

This proposal is different from the ‘multi-gateway’ process described above. It would remove a gateway from the airspace change process, but the requirements would be retained. The change sponsor would still be required to complete Stage 1 (Define) and Stage 2 (Develop and Assess) and develop the relevant outputs. These would then be considered at a single gateway that would occur at the end of Stage 2.

Option 1 is presented in Figure 1 below. It is similar to option 2 as it also proposes a single gateway at the end of Stage 2 (Develop & Assess). This option is not compatible with option 4 or 7. This option is compatible with option 3.

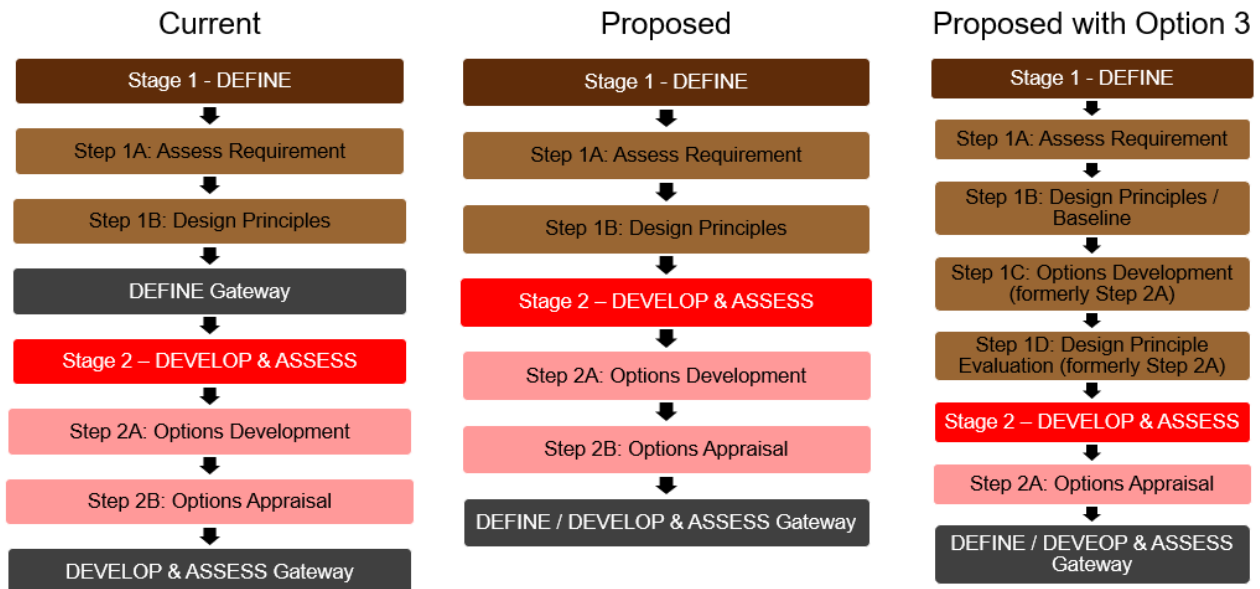


Figure 1: Option 1 Flowchart

If we were to progress this option, it could **benefit** change sponsors in reducing the overall time taken to complete these two Stages. The change sponsor would only be required to complete documentation for one gateway assessment meeting, but this would cover both Stages 1 (Define) and 2 (Develop & Assess) outputs.

In terms of **identified impacts**, there is a risk that the change sponsor may be required to re-do work already completed if the CAA is not content that the regulatory requirements in respect of the development of DPs have been met. The consequences of this could be more severe for change sponsors if there is a single gateway covering both Define and Develop and Assess outputs. This risk would be mitigated by ensuring sufficient clarity is provided by the CAA, both within an updated CAP1616 and during an Assessment Meeting, with regards to the regulatory requirements and expectations for Stage 1 (Define) and Stage 2 (Develop & Assess) of the airspace change process.

Although the change sponsor would not be required to prepare and submit documentation for a Stage 1 gateway assessment meeting, the volume of material required for the combined Define/Develop and Assess gateway would inevitably be more substantial. CAP1616 currently requires change sponsors to submit documentation for the gateway at least 2 weeks in advance but acknowledges that more than 2 weeks may be required depending on the size and complexity of the ACP. If we were to progress this option, longer lead times may be required for the delivery of gateway materials to the CAA to ensure relevant resources have sufficient time to complete their regulatory assessments.

This option could potentially provide more capacity for consideration of other ACPs at gateway assessment meetings as there would be fewer gateways to accommodate overall. An administrative check point would be required for the CAA to be satisfied that certain actions required of the change sponsor for completion during Stage 1 (Define) have been satisfactorily completed. These might include ensuring that the change sponsor has depicted the potential area of impact for their airspace change onto the CAA’s airspace change portal. This administrative check would not cover regulatory requirements that need to be assessed at a gateway assessment meeting.

**Option 2: Move Step 1B (Design Principles) into Stage 2 (Develop & Assess), with a single gateway assessment meeting at the end of Stage 2 (Develop & Assess)**

This option proposes that the airspace change process requirements for change sponsors at Step 1B (Design Principles) are subsumed into Stage 2 (Develop & Assess). This option is proposed on account of feedback that the airspace change process is too long and that it is too complex and burdensome. It could result in change sponsors amalgamating part, or all, of the requisite engagement activities for these two Stages, which could help to minimise stakeholder fatigue and gain efficiencies of time, resource, and cost. It is likely that an administrative check point would be required for the CAA to ensure that certain actions required of the change sponsor, as discussed above for Option 1, have been completed satisfactorily. For example, this administrative check might take place at the conclusion of Step 1A.

Option 2 is presented in Figure 2 below. It is similar to option 1 as it also proposes a single gateway at the end of Stage 2 (Develop & Assess). It is not compatible with option 3 or 7. This option is compatible with option 4.

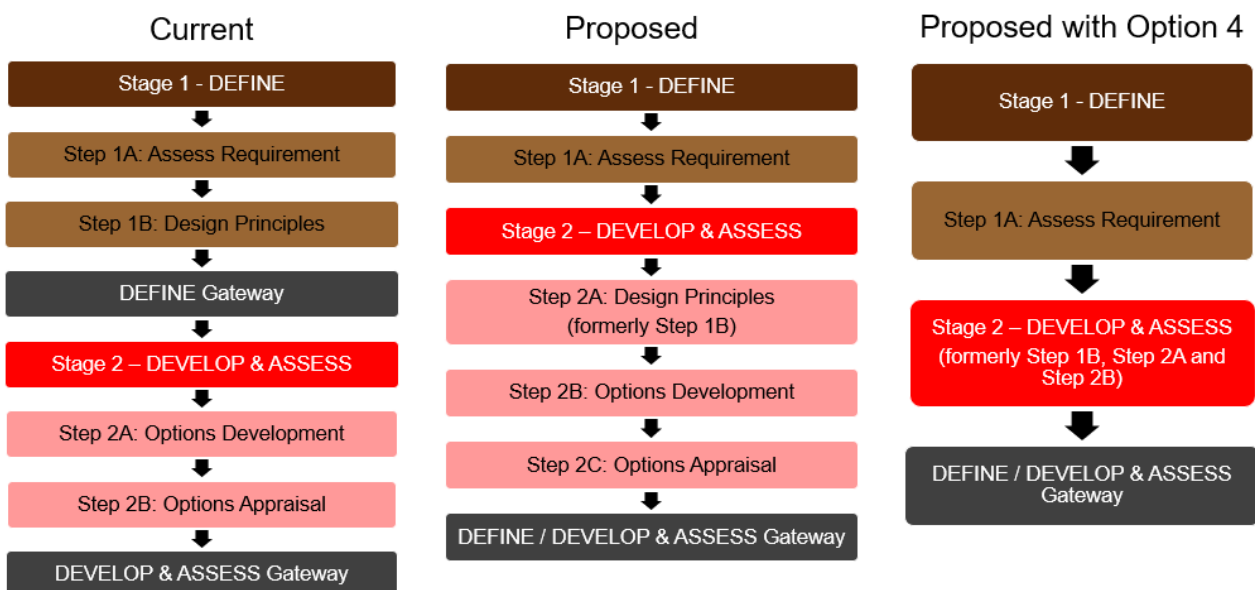


Figure 2: Option 2 Flowchart

If this option were to be progressed, it would **benefit** change sponsors in reducing the content of Stage 1 (Define) considerably as only the requirements regarding the compilation of a Statement of Need and Assessment Meeting from Step 1A (Assess Requirement) of Stage 1 (Define) would be retained. Although it removes a gateway from the airspace change process, the requirements for Stage 1 (Define) and Stage 2 (Develop & Assess) would be considered in a combined gateway at the end of Stage 2 (Develop & Assess).

In terms of **identified impacts**, Stage 2 (Develop & Assess) would contain more airspace change process requirements and could as a result be more burdensome for change sponsors. There is a risk that the change sponsor may be required to re-do work already completed if the CAA is not content that regulatory requirements have been met. The consequences of having to re-do work could be more severe for change sponsors if there is a combined gateway at the end of Stage 2. This risk would be mitigated by ensuring sufficient clarity is provided by the CAA, both within an updated CAP1616 and during an Assessment Meeting, with regards to the regulatory requirements and expectations for Stage 1 (Define) and Stage 2 (Develop & Assess) of the airspace change process.

Although the change sponsor would not be required to prepare and submit documentation for a Stage 1 gateway assessment meeting, the volume of material required for the combined Define/Develop and Assess gateway would inevitably be more substantial. Also currently change sponsors are required to submit documentation for the gateway 2 weeks in advance, or 4 weeks in advance for some proposals, including FASI airspace changes. Airspace Regulators may require longer than this to consider submissions for a combined gateway, due to their increased size, and so change sponsors could be required to submit their documentation earlier than at present.

### **Option 3: Move Step 2A (Options Development and Design Principle Evaluation) into Stage 1 (Define) into Stage 1 (Define) as new Steps 1C and Step 1D**

Continuing with the idea of amalgamating steps to reduce the length and complexity of the airspace change process, this option proposes moving Step 2A (Options Development) into Stage 1 (Define) (see Figure 3 below). Step 2A (Options Development) requires change sponsors to develop their options, test those options with relevant stakeholders and develop a Design Principle Evaluation (DPE) showing how the options meet the DPs. A new Step 1C could be created during which the development and testing of the change sponsors first comprehensive list of design options takes place and a new Step 1D could be created during which change sponsors develop their DPE. The comprehensive list of options is a list of all possible scenarios that will address the issues and opportunities set out in the statement of need and aligning with the DPs. It is as long or as short as it needs to be. We are interested in receiving your views on this option. The Initial Options Appraisal currently required by Step 2B would be retained on its own at Stage 2 (Develop & Assess).

Option 3 is presented in Figure 3 below. It is not compatible with Options 2 and 4 but is compatible with Option 1. It would be compatible with Option 7 if the Stage 1 Gateway were to be retained.

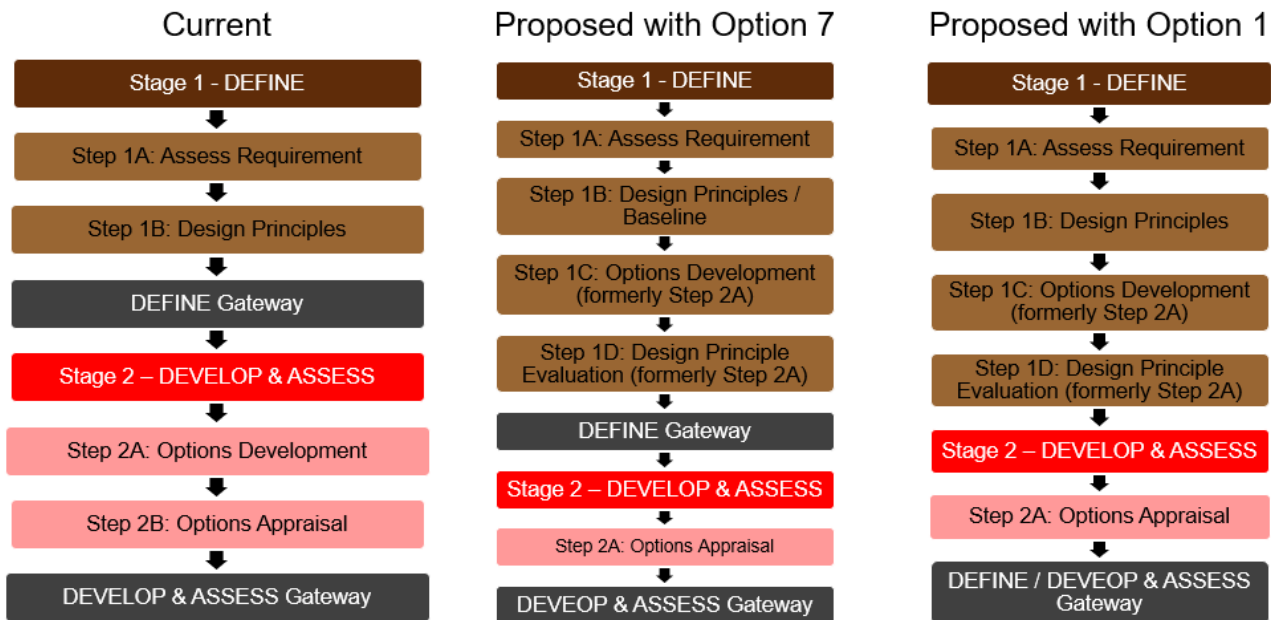


Figure 3: Option 3 Flowchart

If we were to progress this option, it would **benefit** stakeholders' understanding of the DPs by considering them in the knowledge of the change sponsor's first comprehensive list of options. If the DPs were to be rationalised as discussed earlier regarding mandatory and discretionary DPs, this would be less of a benefit. This option would **benefit** change sponsors by helping to ensure they consider their DPs when developing design options. It may assist change sponsors in demonstrating that their comprehensive list of options aligns with the DPs. Information and data collection at an earlier stage would allow for a change sponsor to provide meaningful rationale to scope/scale assessments.

In terms of **identified impacts**, Stage 2 (Develop & Assess) would be fragmented leaving only the requirement to complete the Initial Options Appraisal. For the CAA to fully understand and assess the Initial Options Appraisal, we would need to refer back to the change sponsor's Stage 1 (Define) Options Development material.

The **effect** of this option is that the change sponsor's comprehensive list of design options would be presented at the Stage 1 (Define) gateway assessment meeting without any evaluation. This would make it difficult for Airspace Regulators to give an informed opinion on the options. If the CAA approved the ACP's progression to Stage 2 (Develop & Assess), it could give the impression that the options were being endorsed by the CAA before the presentation by the change sponsor of any analysis of the options or decision



on progression or rejection of any option(s). Change sponsors may consider that Stage 1 (Define) requirements are made too burdensome.

### Option 4: Combine Steps 2A (Options Development) and 2B (Options Appraisal) to create simply Stage 2 (Develop & Assess)

It is recognised that Stage 2 (Develop & Assess) represents a complex part of the airspace change process and the way in which it is currently presented has caused confusion. This option proposes the combination of separate Steps 2A (Options Development) and 2B (Options Appraisal), into a single Stage 2 (Develop & Assess) to make the Stage more logical and therefore easier to understand and apply (see Figure 4 below).

Option 4 is presented in Figure 4 below. It is compatible with Options 1 and 2 but not 3. It would be compatible with Option 7 if the Stage 1 Gateway were to be retained.

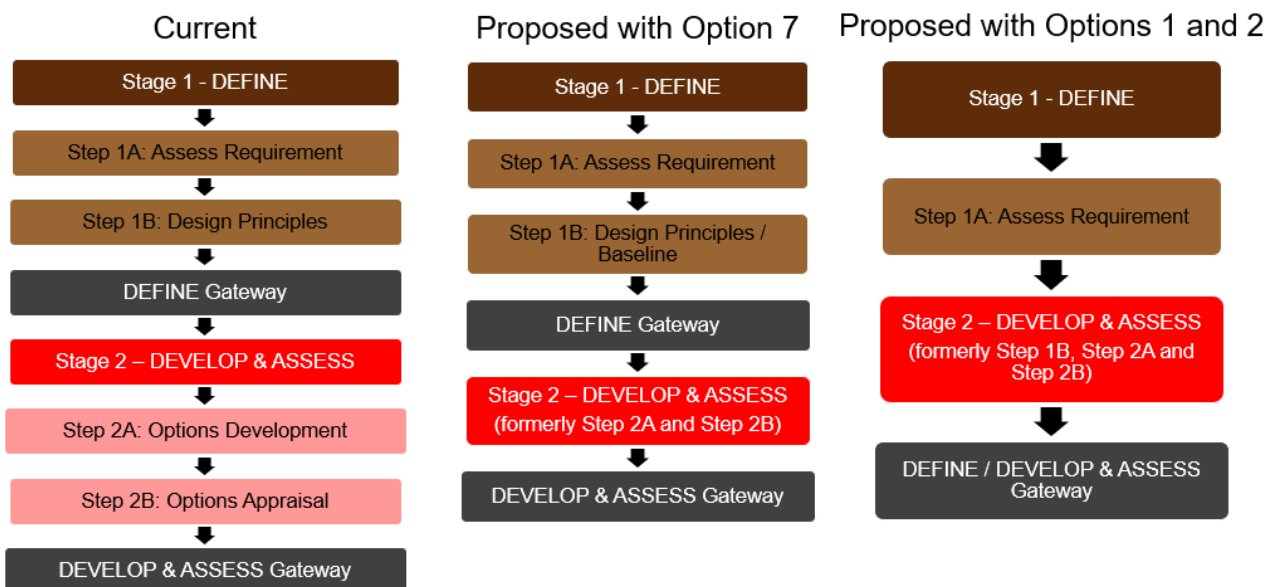


Figure 4: Option 4 Flowchart

If we were to progress this option, it would **benefit** change sponsors by realising efficiencies in document preparation as options development, Design Principle Evaluation and Initial Options Appraisal could be combined within the same document.

In terms of **identified impacts**, the airspace change process as written currently is set out in Stage 2 (Develop & Assess) with a structure containing specified steps (2A and 2B) and it may be that combining these could result in the documentation becoming rather unwieldy.

The **effect** of this option is that combining options development and analysis would reduce the amount of cross-referencing that is required currently by CAA Regulators when assessing submissions.



### Option 5: Remove Step 3D (Collate and Review Responses) from the airspace change process and move current Step 3D requirements to Step 4A (Update Design)

Change sponsors are currently required to review and categorise their consultation responses at a time of their choosing, within the overall timeline agreed with the CAA, between the close of the consultation and the updating of the airspace design at Step 4A.

The overlap between Step 3D and Step 4A was found to have caused some confusion for stakeholders and it was suggested that the airspace change process could be simplified and streamlined. We have noted that some change sponsors have combined the submission of their Step 3D Categorisation of Responses document together with their Step 4A Consultation Response Document. This option proposes moving the requirement to collate and review consultation responses and then produce and submit to the CAA the categorisation of responses from Step 3D to Step 4A (see Figure 5 below). This would achieve a simplification of the airspace change process. This option is not proposing removing the current Step 3D requirements from the airspace change process altogether. The review and categorisation of consultation responses is a very important part of the airspace change process requiring the change sponsor to carry out a fair, transparent and comprehensive review and categorisation of all their consultation responses.

Option 5 is presented in Figure 5 below. It is compatible with option 6.

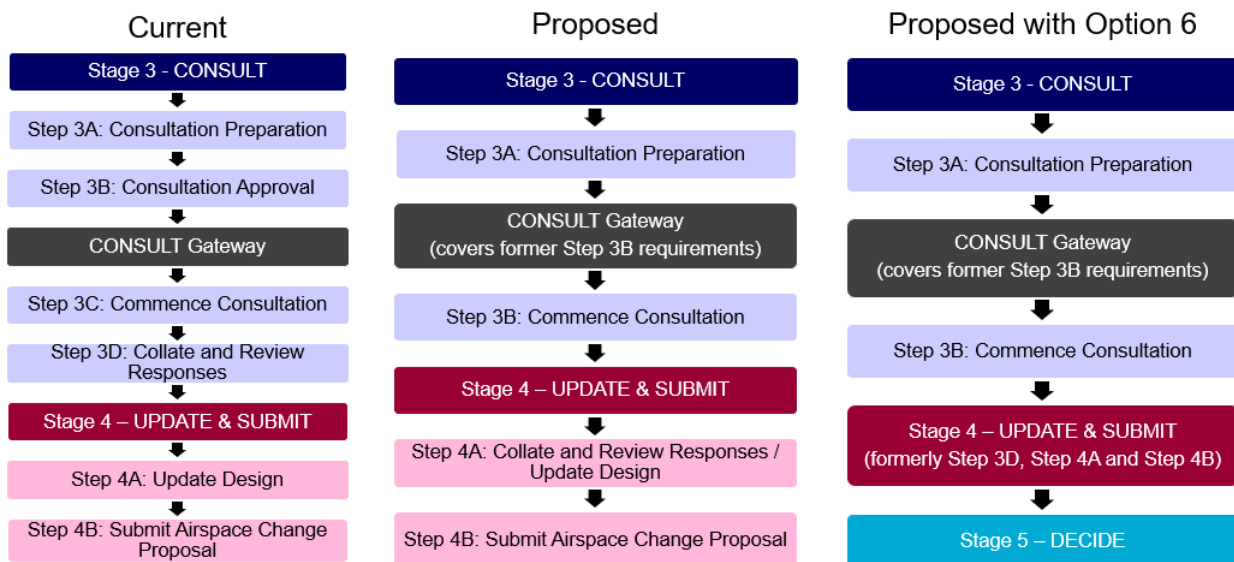


Figure 5: Option 5 Flowchart

If we were to progress with this option, it would **benefit** change sponsors by simplifying the stages.

In terms of **identified impacts**, stakeholders would not ascertain until Stage 4 (Update and Submit) how the change sponsor has considered their feedback as all Step 4A documentation would need to be prepared before the categorisation of responses is published. This may be viewed as a drawback by stakeholders who currently have a preview, via the change sponsor's Step 3D categorisation of responses report, of what the ACP might comprise.

This option would present challenges for Airspace Regulators where a large volume of consultation responses has been submitted. The Regulator reviews a sample of the responses to determine whether the change sponsor has carried out the categorisation fairly. If the categorisation report is submitted with Step 4A documentation at the commencement of the 16-week regulatory evaluation period, this work would need to be completed concurrently with the time allowed for a document check. The **effect** of this would be a likely reduction in the time available overall to assess the Stage 4 (Update and Submit) submission. This could place the ability of the CAA to meet the 16-week decision timeline at risk unless consideration is given to amending the current decision timeline. We are interested in receiving your views.

### **Option 6: Combine Steps 4A (Update Design) and 4B (Submit ACP) within Stage 4 (Update and Submit).**

This option aims to simplify the presentation of the airspace change process by combining the two Steps 4A (Update Design) and 4B (Submit ACP) within Stage 4 (Update and Submit). This reflects current practise adopted by many change sponsors of submitting both Step 4A (Update Design) and Step 4B (Submit ACP) documentation at the same time.

Option 6 is presented in Figure 6 below. It is compatible with option 5.

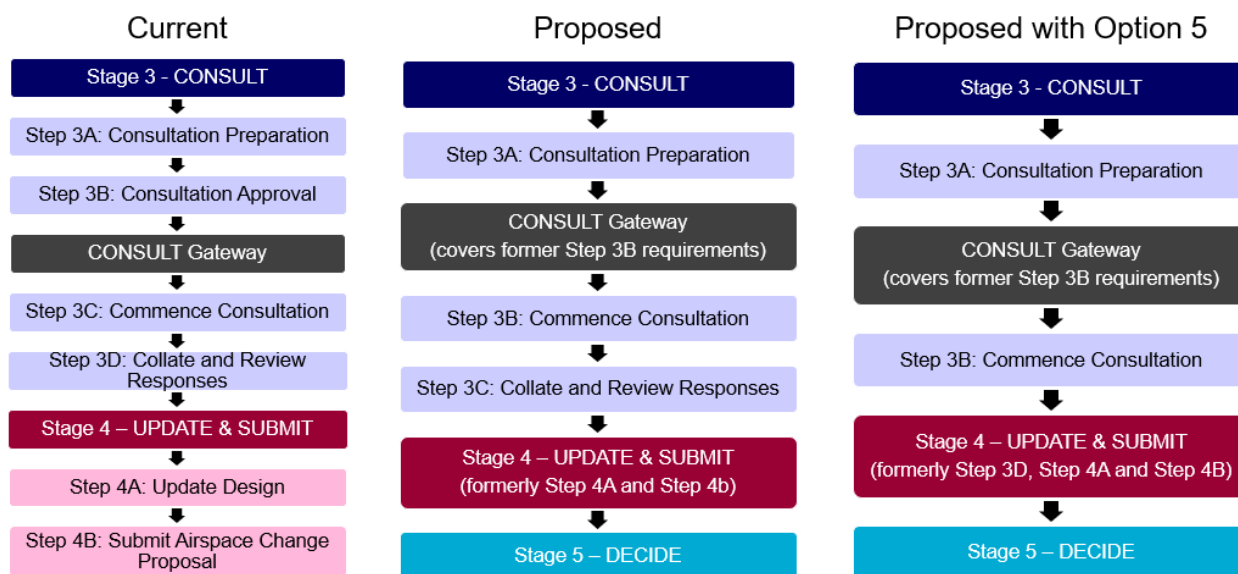


Figure 6: Option 6 Flowchart

If we were to progress with this option, it would **benefit** both change sponsors and the CAA in streamlining the process by moving a separate regulatory review cycle of the Step 4A (Update Design) consultation response material, so that it is incorporated into a single review of all Stage 4 (Update and Submit) material.

No **identified impacts** have been identified for this option.

### Option 7: Move requirement to define baseline to Stage 1 (Define) (quantifying where applicable)

Change sponsors are required to clearly articulate and understand the current-day scenario i.e., the baseline. Moving the requirement to define the baseline to Stage 1 (Define) would align with Appendix A Table A1 requirements and require the baseline to be defined at earlier stages in the airspace change process and for the CAA to assess the baseline at a retained Stage 1 (Define) gateway assessment meeting. Rationale and evidence to scale assessments could be provided from Stage 2 (Develop & Assess) onwards.

Option 7 is presented in Figure 7 below. It would be compatible with option 3 or 4 only if the Stage 1 gateway were to be retained. It would not be compatible with options 1 and 2. It is completely aligned with a separate option that is presented within section 3.5 of the 'Scaling Levels' section earlier in this document.

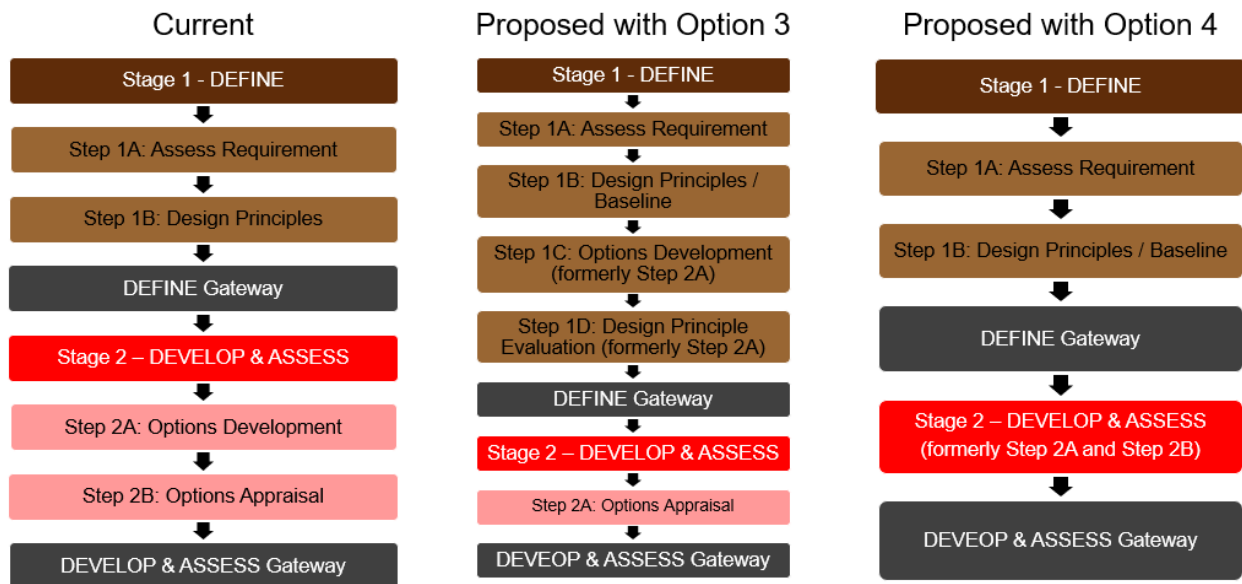


Figure 7: Option 7 Flowchart

If we were to progress with this option, it would **benefit** change sponsors in that the baseline would be agreed earlier and the CAA would assess the baseline earlier (at Stage 1 (Define)). Stakeholders would have an early appreciation of the status quo which is the scenario that they are able to relate to. It would remain the case that the baseline is used as a comparison with the proposed options in Stage 2 (Develop & Assess). Stage 1 (Define) would not include the analysis of the baseline performance as that is required in Stage 2 (Develop & Assess) as part of the Initial Options Appraisal. The do nothing option would always be required even if a do-minimum option is used and so superfluous work on the part of the change sponsor would be reduced. The impacts of the change would be more transparent and would be fully assessed.

In terms of **identified impacts**, referencing back to Stage 1 (Define) document for discussion of the baseline would be required at Stage 2 (Develop & Assess).

### Option 8: Do nothing

This option would result in no changes to the CAP1616 stages, steps and gateways as currently described. Some **benefits** would be delivered by taking the opportunity to clarify in the text that the airspace change process has sufficient flexibility to allow change sponsors to submit requests for Stages 1 (Define) and 2 (Develop & Assess) to be combined and for Stages 1 (Define), 2 (Develop & Assess) and 3 (Consult) to be combined while stating that multi-gateway submissions are permissible. In terms of **identified impacts**, those described above would continue to be experienced.

## 4.5 High-level proposal: Consolidate the Options Appraisal requirements for certain ACPs

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The options appraisal is an iterative process that is developed as the change sponsor refines its design options throughout the airspace change process. In accordance with the current version of CAP1616, the change sponsor is required to develop, and the CAA required to review, the following outputs:

- Initial Options Appraisal – Stage 2 (Develop & Assess) Gateway
- Full Options Appraisal – Stage 3 (Consult) Gateway
- Final Options Appraisal – Stage 5 (Decide)

We could make an allowance within an updated airspace change process for the Initial and Full Options Appraisal to be consolidated for the Stage 3 (Consult) Gateway. While this has the potential to remove some of the regulatory requirements from the Stage 2 (Develop & Assess) gateway, it would only be considered appropriate for those ACPs where the CAA has accepted that there is a maximum of two options, one of which must be the current-day baseline (i.e., the do nothing option). Given the need for it to be an iterative process, it's necessary to conduct the Final Options Appraisal separately, after the consultation process has concluded. As detailed above, we are committed to providing all stakeholders with a clearer understanding of how and where the airspace change process may be scaled, so if this option were to be progressed, it would be reflected in the updated CAP1616 accordingly. We would welcome your views on this proposal.

## 4.6 High-level proposal: Review CAP1616 Stage flowcharts

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In the current version of CAP1616 we provide a flowchart at the end of each of the seven stages as a diagrammatic representation of the workflow or actions required by change sponsors during each of the stages. We wish to review both the content and placement of these flowcharts to ensure they are as useful a tool as possible for the reader. For example, there might be opportunities to enhance their content or move them to the beginning of each stage. We are interested to receive your views.

## 4.8 Rejected high-level proposals

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The following high-level proposals were suggested in response to the 'Stages, Steps, Gateways' theme. Having considered each one carefully, we determined not to progress these, and our rationale for doing so is set out below.

### **Inclusion of a Design Objective within the Statement of Need**

It was suggested that a Design Objective should be contained within the Statement of Need and that change sponsors should be required to engage on it with their stakeholders. It is our view that this is already a requirement in accordance with Appendix A Table A1.

## **Introduction of greater flexibility in dates for gateway assessment meetings**

We have considered the suggestion to introduce greater flexibility in the dates the CAA can provide change sponsors for gateway assessment meetings. Considering the present provision of one meeting per month and criteria that have been introduced enabling some ACPs to be considered at an extraordinary gateway assessment meeting each month, it is not possible for the CAA to accommodate more dates. The updated CAP1616 will better reflect how the airspace change process is managed in terms of likely gateway outcomes (for example targeted reviews that can be accommodated at extraordinary gateway assessment meetings).

## **Move requirement to state preferred design option after Full Options Appraisal**

We have decided that the current requirements are fit for purpose and that we will not move the requirement for change sponsors to state their preferred design option after Full Options Appraisal.

## **Inclusion of flexibility to add design options (new and/or reintroduced) at Stage 3 (Consult)**

This suggestion has been addressed by the provision of our CAP1616 Review Stage 2 – Clarification on the Regulatory Requirements and Expectations document which was circulated in October 2022 (see Appendix C to this consultation document). The content of this clarification document will be incorporated into the updated CAP1616.

## **Remove Stage 2 gateway and move requirements into single gateway at the end of Stage 3**

Our view is that as change sponsors progress through the stages of CAP1616 it becomes harder to merge them. Opportunities to merge stages have been identified and discussed earlier. We are interested in receiving your views on the options we have presented regarding merging certain steps within Stages 1 (Define) and 2 (Develop & Assess).

## 5. Engagement, Consultation and Communications

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### 5.1 Introduction

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All parties involved in the airspace change process require engagement and transparency. As such, effective stakeholder engagement is a vital underpinning of the airspace change process. Internal and external stakeholders suggested that there was a need to ensure the engagement requirements are proportionate and driven by the likely impact of the ACP. Change sponsors and aviation consultancy firms requested more guidance and clarity on the stakeholder engagement requirements, specifically with regards to the analysis of feedback and managing the conflicting demands of the broad range of stakeholders affected by an ACP. When producing the next version of CAP1616, we will ensure that:

- More clarity is provided on when/where the engagement requirements can be scaled down.
- The need for engagement evidence and how it is used to support the regulatory decision-making process is explained.
- Change sponsors understand that they have the freedom to determine what, if anything, they do with each piece of stakeholder feedback, whilst reinforcing the need for them to explain what they did and why.
- The use of digital (online) platforms to support engagement activities is acknowledged, while making it clear that it's the change sponsor's responsibility to determine the most appropriate engagement approach/methodology and explain why they believe that to be the case.
- More guidance is provided on stakeholder identification and management, particularly with regards to challenging and/or disruptive stakeholders.

The transparency requirements of the airspace change process are addressed through the Airspace Change Portal. While external stakeholders welcomed the enhancements that have been made since the introduction of the Portal, some felt that further improvements were required. We welcome this feedback and will continue to explore opportunities to enhance the functionality of the Portal outside of this Review.

When considering each theme, we initially developed 'high-level proposals' before developing specific options to address them. These are presented below, and we would welcome your feedback on these.



## 5.2 High-level proposal: Establish dedicated CAA point of contact for ACP-related enquiries

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Currently, there are key points in the CAP1616 airspace change process where the CAA will proactively seek feedback from stakeholders with regards to ongoing ACPs. These are listed below:

- Step 5a – Secretary of State Call-In requests
- Step 5a – Public Evidence Session requests
- Step 5b – Draft Decision (Level 1 ACPs only) feedback
- Stage 7 – Post Implementation Review feedback

Outside of these key points, we are very aware that stakeholders have initiated contact with the CAA by addressing their correspondence to senior leaders/managers within the CAA and/or by utilising the Use of UK Airspace Report (FCS1521) form. We could establish a dedicated CAA point of contact for ACP related enquiries and incorporate relevant instructions within an updated version of CAP1616. We would only ever comment on enquiries related to the airspace change process and our oversight of it; stakeholders making enquiries regarding the specifics of an individual ACP would be re-directed to the relevant change sponsor. If we were to progress this proposal, we would utilise a generic mailbox and establish service level agreements to ensure related correspondence is processed and responded to in good time. We would welcome your views on this proposal.

## 5.3 High-level proposal: Review the ICCAN toolkit

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Following the winding-down of the Independent Commission on Civil Aviation Noise (ICCAN), the Secretary of State for Transport asked the CAA to take on some of their functions. ICCAN had previously developed [a consultation toolkit](#) to help change sponsors plan for public consultation. It was devised to complement CAP1616 and to offer practical ideas as change sponsors seek to consult with impacted groups, local communities, and other airspace users about changes to flight paths and the noise implications of their ACPs. Although the toolkit is no longer maintained, it remains available through the National Archives website.

While we do not intend to reinvigorate the consultation toolkit in its current format, we do recognise that it may contain some content that could help enhance the level of guidance that we provide at the consultation stage of the CAP1616 airspace change process. Therefore, we are interested to hear your views on what (if any) parts of the toolkit should be retained and how this could be incorporated and managed by the CAA going forward.

## 5.4 High-level proposal: Categorisation of consultation responses

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The airspace change process requires the change sponsor to review and categorise consultation responses into those that present information that may lead to a change in the



design and those that could not, including those raising issues which are outside of the change sponsor's control. Specific guidance (Appendix C, Table C2) is provided on how this should be done and we would welcome your feedback on whether this guidance adds value to the airspace change process and/or should be retained.

## 5.5 High-level proposal: Remove any reference to 12-weeks being the 'accepted standard' for consultation

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ACPs vary greatly in terms of their size and complexity and the airspace change process must be sufficiently scalable to ensure it is proportionate. At Stage 3 (Consult), CAP1616 acknowledges that the duration of the consultation must be proportionate to the scale of the change and the number of stakeholders potentially affected, and that it should be informed by relevant Government guidance and best practice. The [Government's Consultation Principles \(2018\)](#) document currently states that "consultation should last for a proportionate amount of time" and that the length should be based on the "nature and impact of the proposal". Unlike CAP1616 it does not specify an "accepted standard" and there is no reference to a specified number of weeks. To ensure that CAP1616 is aligned with current Government guidance, we are proposing to remove any reference to 12-weeks being the "accepted standard" within the airspace change process. We will continue to exercise flexibility in this area and will consider the proposed timeline for individual ACPs at the Stage 3 (Consult) gateway when we complete our regulatory assessment of the change sponsors consultation strategy and draft consultation document. We are interested to hear your views on this proposal, and whether there is a need for us to specify a minimum/maximum period for consultation, and what that should be within an updated CAP1616.

## 5.6 High-level proposal: Transfer the responsibility of moderating/publishing consultation responses from CAA to change sponsor

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The airspace change process requires consultation responses to be moderated and published at regular intervals during the consultation (Step 3C). This task is completed by the CAA, with an allowance built into the airspace change process for the change sponsor to see the responses 24-hours in advance of their publication. All ACP consultations are required to use the Citizen Space platform, which means that the change sponsor and CAA are required to have accounts to enable them to complete their respective actions. For any consultation, the routine practice would be for the consultor (the organisation running the consultation) to manage their consultation responses and therefore we are proposing to transfer the responsibility for moderating/publishing consultation responses from the CAA to the change sponsor. If were to proceed with this proposal, we would ensure that appropriate measures are established to review the moderation completed by the change sponsor to assure ourselves that they are limiting their moderation to only that content that is deemed not suitable for publication. We would welcome your views on this proposal.

## 5.7 High-level proposal: Better use of airspace change portal/CAA website for related guidance

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We are very aware that the airspace change process can be complicated for all stakeholders to understand and follow. We are therefore keen to hear your views on how we could make better use of the Portal and/or the CAA website to share content that may benefit stakeholders that participate in the airspace change process. For example, we may be able to develop short, informative videos and/or animations that provide a summary of the requirements throughout the airspace change process.

## 5.8 Rejected high-level proposals

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The following high-level proposals were suggested in response to the 'Engagement, Consultation and Communications' theme. Having considered each one carefully, we determined not to progress these, and our rationale for doing so is set out below.

### **Reconsider categories of stakeholders with which engagement is expected**

CAP1616 currently specifies categories of stakeholders with which engagement is expected to support the development of the ACP in the early stages of the airspace change process. Some community/environmental representatives felt there was the potential to exclude some representative bodies/groups that may genuinely feel they have something to contribute and suggested that the categories listed needed to be reconsidered. We have reviewed the categories of stakeholders and have concluded that they are fit for purpose, as they are broad enough to capture the various organisations best placed to represent the wide range of stakeholders likely to be affected by any ACP. Therefore, we do not intend to propose making any changes to the categories of stakeholders as currently defined within CAP1616.

### **Provide guidance that enables change sponsors to conduct proportionate and cost-effective engagement/consultation exercises**

Aligned with the need to ensure that engagement requirements are proportionate, change sponsors and aviation consultancy firms suggested that more guidance should be provided to enable them to conduct proportionate and cost-effective engagement and consultation activities. The CAA recognises the desire for further clarity on how the engagement requirements could be scaled down and we will address this in an updated CAP1616. However, the change sponsor 'owns' the ACP and is solely responsible for determining the most appropriate approach and methodology to ensure the engagement requirements of the airspace change process are satisfied. They are best placed to understand the unique needs and requirements of their stakeholders, and identify what opportunities exist for them to conduct proportionate and cost-effective engagement and consultation activities. While we do not intend to progress this proposal, we will ensure that CAP1616 makes allowances for change sponsors and aviation consultancy firms to apply proportionality when addressing the engagement requirements of CAP1616.

## **Provide an arbitration service**

Acknowledging the wide range of stakeholder interests and their various needs/requirements and expectations, it was suggested that the airspace change process should require the CAA to provide an arbitration service to help resolve fundamental disagreements between change sponsors and stakeholders. The CAA recognises that a broad range of stakeholders are affected by the airspace change process and the challenge of balancing their needs/requirements and expectations. However, as we are responsible for the regulatory oversight of the airspace change process, it is essential that we protect our independence so as not to compromise our role and responsibilities. Change sponsors are therefore best placed to understand the needs/requirements of their stakeholders and work constructively with them to manage conflicts as and when they arise. It should also be acknowledged that there may be instances where it is simply not possible to reconcile such disagreements, given the different interests that the broad range of stakeholders have in the airspace change process. Any stakeholder wishing to express their views directly to the CAA has the option to do so (for Level 1 ACPs only) during the Public Evidence Session which may be facilitated at Stage 5 (Decide) of the airspace change process. There is also the option for those wishing to challenge a regulatory decision that the CAA has made to seek appropriate recourse through a judicial review. Consequently, we do not intend to progress this proposal.

## 6. Clarity

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### 6.1 Introduction

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The feedback we received regarding the clarity and complexity of CAP1616 was consistent across all our stakeholder groups. CAP1616 was seen as cumbersome for those change sponsors that must apply it, as well as for those stakeholders affected by it. The airspace change process was perceived as lengthy and complex to understand and explain. The CAA recognises stakeholders' desire for more clarity from CAP1616 and we have identified some areas where the text could be revised to make it clearer.

It is evident, from our consideration of submissions for gateway assessment meetings, that some stakeholders have found the requirements of Stage 2 (Develop & Assess) to be particularly challenging. In October 2022 we produced CAP1616 Review Stage 2 – Clarification on the Regulatory Requirements and Expectations to assist change sponsors with their completion of Stage 2 (Develop & Assess). We plan to update CAP1616 so that it aligns with the content of the Clarification document although we recognise there may be a need to amend this document to reflect the outcome of the consultation.

We will ensure that the next version of CAP1616 clearly explains the assessment requirements of linked ACPs (for example, are either contingent upon or an enabler for, or a part of a 'phased' implementation programme of changes) so that all details of cumulative impacts are considered on a combined basis. This could include clarification on how to identify linked ACPs, while also detailing the assessment methodology to be applied to evaluate the cumulative impacts (e.g., metrics to be assessed and trade-offs to consider).

We have also considered how best to enhance guidance for change sponsors on Stage 7 (Post-Implementation Review) of the airspace change process. We have devised a scaled approach in terms of data provision by change sponsors for low/medium impact airspace changes. We plan to update the content of Stage 7 (Post Implementation Review) to reflect this scaled approach.

We will proceed to update CAP1616 where revisions have become necessary, for example regarding the implementation of new legislation and revised government policy. We plan to improve the robustness of Appendix A Table A1 and Appendix E Table E2 adding metrics, such as tranquillity and biodiversity, that are not currently included. We will specifically list in these templates different metrics required to be considered within the assessment of a certain environmental impact, for example, Leq contours and TAG, Nx contours, operational diagrams, and overflight assessment for noise, to ensure that they are included in change sponsors' environmental assessments and options appraisals.

These are pre-existing requirements as they are detailed elsewhere in CAP1616 (Appendix B); we are simply proposing to update the content of Tables A1 and E2 to ensure it is aligned accordingly.

We received feedback from the Airspace Change Organising Group (ACOG) that the roles and responsibilities of Airspace Regulators working on ACPs are not clearly defined or commonly understood by change sponsors. ACOG recommended that additional information be provided regarding the responsibilities of the various regulatory roles that support the airspace change process. We will review and update content where appropriate regarding roles and responsibilities of the key participants involved in the airspace change process.

Change sponsors and aviation consultancy firms suggested that there was a need to be clearer on what is mandatory, recommended, or optional reflecting that the language used in CAP1616 does not allow for easy distinction between these things and suggesting that this can lead to inconsistencies of approach.

We agree that there are opportunities to make CAP1616 clearer regarding which parts of the airspace change process are mandatory compared to those that are discretionary; this is something that we hope to address through the proposals detailed above in the 'Document Structure' section. We will also integrate or cross-reference text to the requirements of other relevant Civil Aviation Publications including CAP1616a<sup>5</sup>, CAP2091<sup>6</sup> and CAP1498<sup>7</sup>, provide best practise definitions of, for example, respite and Continuous Climb or Descent Operations (CCO/CDO), and update the glossary.

Feedback suggested that greater clarification could be provided through better use of case studies and best practice examples to help stakeholders understand the regulatory requirements and how they should be applied. Whilst it would not be our intention to incorporate this within an updated CAP1616, we will consider alternative options for sharing such outputs, if indeed we feel that it's appropriate to produce them.

While we will proceed to revise CAP1616 in the ways described above, there are further opportunities to provide clarity where we would welcome your views. These are described below.

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<sup>5</sup> [CAP1616A Environmental requirements technical annex second edition.pdf \(caa.co.uk\)](#)

<sup>6</sup> [CAP2091 CAA Policy on Minimum Standards for Noise Modelling](#)

<sup>7</sup> [CAP1498 Definition of Overflight](#)

## 6.2 High-level proposal: Clarify assessment requirements

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While recognising that stakeholders require comprehensive guidance on the airspace change process, we are of the view that there is scope for revising CAP1616 to clarify assessment requirements.

### **Option 1: Providing templates for the baseline data collection, environmental assessments, options appraisals**

Consideration and assessment of the potential environmental impacts resulting from proposed airspace changes is necessary as part of the CAA's decision-making process and it enables those who are affected by the proposed change to better understand the impacts of the different options being considered. Change sponsors are required to describe the current-day scenario, i.e., the baseline, and undertake environmental assessments of potential impacts as part of Step 2B Initial Options Appraisal, for inclusion in consultation material as part of the Full Options Appraisal at Step 3A and to conduct a re-assessment for the Final Options Appraisal at Step 4A. Change sponsors are also required to assess the cost and benefits of all viable options in their ACP at each of the three appraisal phases.

CAP1616 Appendix A Table A1 contains a list of some of the information required to describe the current/existing situation while CAP1616 Appendix E Table E2 contains a non-exhaustive list of such potential costs and benefits that may arise as consequences of the airspace change proposed. Table E2 also provides a structure and format as a guide to the expected approach for key analysis that change sponsors may use in their options appraisal.

During our engagement activities, stakeholders voiced concerns regarding the complexity of the airspace change process with some saying that change sponsors were expected to be "instant experts" on airspace change and others making requests for more guidance to be provided. The CAA proposes providing more guidance in the form of templates for use by change sponsors for the baseline data collection and completion of environmental assessments and options appraisals. We explained earlier that we plan to improve the robustness of Table A1 and Table E2 CAP1616 by adding metrics, including tranquillity and biodiversity, that are not currently included. Table A1 and Table E2 CAP1616 could be provided as a template and the content of the templates aligned with the Tables in their improved format.

If we were to progress with this option, it would **benefit** change sponsors in enabling more efficient and homogenous data collection while assisting the CAA's decision-making process and providing more consistency across submissions for airspace changes.



In terms of **identified impacts**, there would be a risk that additional information/data that change sponsors have but the CAA is not aware of, particularly for some ACPs with special or novel requirements, may not be presented to the CAA.

## **Option 2: Stating assessment requirements for permanent and temporary ACPs concerning new entrants (Space Operators/UAS)**

Since CAP1616 was first published, there has been a significant increase in the numbers of new entrants commencing ACPs. For example, with the creation of spaceports across the UK, space operators have been progressing space related ACPs. In addition, increasing numbers of ACPs have been submitted regarding the use of UAS Beyond Visual Line of Sight (BVLOS). Some stakeholders told us that they felt that the airspace change process disadvantaged certain airspace users and new entrants and that the airspace change process did not readily lend itself to progress new technologies, including UAS, and Advanced Air Mobility (AAM).

We propose providing assessment requirements for permanent and temporary ACPs involving new entrants to reflect the increasingly wide variety of ACPs received.

If we were to progress with this option, it would **benefit** change sponsors in the provision of additional guidance catering to their specific needs as they make use of new technological advances, and it has the potential to improve the consistency and quality of the submissions of these types of ACP.

In terms of **identified impacts**, this option would result in CAP1616 increasing in size. The CAA would need to develop and agree the guidance, and this may take time.

## **Option 3: Add requirement to analyse 'other costs' which may arise for airports/ANSPs**

Table E2 of the CAP1616 guidance contains a list of potential costs/benefits that may arise in the assessment of an ACP. CAP1616 clearly states that this list is by no means exhaustive and encourages change sponsors to understand all of the potential costs and benefits that may be relevant for their specific ACP. As explained above, we will update Table E2 to ensure that it incorporates the pre-existing environmental requirements as detailed elsewhere within CAP1616 (Appendix B). However, to ensure we receive a more complete and robust submission from the change sponsor, we could add a row which will place a requirement on the change sponsor to quantify and where possible monetise any 'other costs' that may be incurred by airports/ANSPs. We could also accept a qualitative approach to such analysis (as we do for commercial airlines) where the change sponsor feels that a quantitative approach is either disproportionate or not possible to achieve.

This would **benefit** the airspace change process and relevant stakeholders by enhancing the level of analysis undertaken throughout the options appraisal process, and by driving more complete and robust submissions from change sponsors.

An **identified impact** would be that some additional analysis would be required by change sponsors, as this is another element that they would need to consider and incorporate within their options appraisals.

### Option 4: Do nothing

This option would result in no changes being made to CAP1616 to clarify assessment requirements. This would deliver no **benefit** as it would fail to address the feedback that we had received linked to this theme. In terms of **identified impact**, those described above would continue to be experienced.

## 6.3 High-level proposal: Introduction of guidance meetings at key points in the airspace change process

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The initial Assessment Meeting is used as an opportunity to provide advice and guidance on the requirements of the airspace change process and clarify the CAA's expectations in terms of related outputs. Given the requirements of the airspace change process, we are aware that it can take some time to progress through the early stages, meaning that there is routinely a significant period between the Assessment Meeting and Stages 2 (Develop and Assess) and 3 (Consult). We could introduce additional guidance meetings at key points in the airspace change process that would be used to supplement the advice and guidance originally provided at the Assessment Meeting. We would be interested to hear your views on this proposal, particularly regarding the suitability of such meetings and the points at which they could or should be established.

## 6.4 High-level proposal: Requirement for change sponsor-led briefing at point of submission (Gateways and Stage 4 Update and Submit)

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We propose inserting a requirement into the airspace change process for change sponsors to brief relevant Airspace Regulators when they are submitting their documentation for each gateway and at Stage 4 (Update and Submit) of the airspace change process for all types (permanent, temporary, and airspace trials) of ACP. The purpose would be to introduce the documentation being submitted and to answer any preliminary enquiries arising. Such a briefing could assist the CAA with its completion of the document check, whilst also supporting individual Airspace Regulators in gaining an understanding of and familiarity with the documentation. It would also provide the opportunity to highlight key documentation and evidence that may be missing at an earlier stage, thereby enhancing the efficiency of the CAA's regulatory assessment and decision-making process. We are not proposing that this briefing will be used to provide a preliminary or indicative regulatory decision to the change sponsor – it is purely to help the CAA understand the documentation being submitted. We are interested to receive your views on this suggestion.



## 6.5 High-level proposal: Review of guidance contained within Stage 6 (Implement)

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Stakeholders told us that they would appreciate more guidance at Stage 6 (Implement). Currently Stage 6 (Implement) provides an overview of the airspace change process requirements a change sponsor must carry out on implementation of their airspace change, if approved. We are interested to receive your views on whether you consider more guidance could be provided at Stage 6 (Implement), and if so, what type of guidance that could be.

It is worth noting that the Aeronautical Information Exchange Model (AIXM) will become the primary format used for providing change data to the Aeronautical Information Service (AIS) in the medium-term future. Whilst the specific requirements are yet to be confirmed and promulgated, we will ensure that they are reflected accordingly in the next version of CAP1616. Stakeholders that are unaware of the upcoming requirement to use AIXM data can seek further guidance in CAP1054<sup>8</sup> or via the [Eurocontrol guidance pages](#)<sup>9</sup>. This consultation provides us with an opportunity to hear from those stakeholders that are required to submit change data to AIS, and to understand whether they have the capabilities to meet this requirement and if not, what their future intentions are.

## 6.6 High-level proposal: Provision of airspace change scope flowchart

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Within CAP1616 Part 2, we currently provide guidance on the planned and permanent re-distribution of air traffic (PPR) (through changes in air traffic control operational procedure) airspace change process. A flowchart is included that helps change sponsors to identify whether an ACP is in or out of scope of the PPR airspace change process. We are interested in receiving your views on whether a similar type of flowchart, placed at the beginning of CAP1616, would assist change sponsors determine whether their ACP is in or out of scope.

## 6.7 High-level proposal: Clarify decision criteria

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At Stage 5, the CAA reviews and assesses ACPs in accordance with legal requirements and government policy as set out in Appendix G of CAP1616.

Under Section 70 of the Transport Act 2000, the CAA must take in to account a number of material factors when considering whether to agree to an airspace change proposal, including safety, environmental impacts such as noise and greenhouse gas emissions, the needs of airspace users and the interests (economic or otherwise) of airports or air navigation service providers. Table G1 in Appendix G gives examples of the types of

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<sup>8</sup> [CAP1054: Aeronautical Information Management](#)

<sup>9</sup> [Aeronautical Information Exchange Model \(www.aixm.aero\)](http://www.aixm.aero)

characteristics change sponsors should look for in helping them gauge to what extent their proposal contributes positively or negatively to the materials factors that the CAA must consider in its decision-making. These examples are not exhaustive but intended to assist sponsors in developing their proposals in line with legal requirements and government policy.

In addition to considering the material factors in section 70 of the Transport Act, the CAA has a duty to decide ACPs in accordance with its Airspace Modernisation Strategy.<sup>10</sup> The Airspace Modernisation Strategy lays out the overall vision for airspace modernisation in the UK by setting out the *ends* (strategic objectives), *ways* (delivery elements) and *means* (delivery plans) of modernising airspace. That vision is to deliver quicker, quieter, and cleaner journeys and more capacity the benefit of those who use and are affected by UK airspace.

In exercising its duty to decide ACPs in accordance with the Airspace Modernisation Strategy, the CAA assesses to what extent the change sponsor has demonstrated that the proposal aligns with the vision and strategic objectives of that strategy. Similar to the current Table G1 in Appendix G, the CAA is proposing to give examples of the types of characteristics change sponsors should look for in helping them gauge to what extent their proposal consistent with the Airspace Modernisation Strategy. The list would not be exhaustive but intended to offer guidance on how an ACP might perform against the objectives of that strategy. We are interested in receiving your views on whether this information would be helpful and how you would like to see it presented.

## 6.8 Rejected high-level proposals

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The following high-level proposals were suggested in response to the 'Clarity' theme. Having considered each one carefully, we determined not to progress these, and our rationale for doing so is set out below.

### **Remove Design Principle Evaluation (DPE) Proforma**

At Step 2A (Options Development), change sponsors test their first comprehensive list of design options with their stakeholders to ensure that they are satisfied that the design options are aligned with the DPs developed at Step 1B (Design Principles) of the airspace change process and that the change sponsor has properly understood and accounted for stakeholder concerns. Change sponsors are then required to evaluate their design options against the DPs in a fair and consistent manner.

Consideration was given to removing the DPE proforma due to some stakeholders suggesting that it may be too prescriptive in requiring the use of this format. We do not

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<sup>10</sup> <https://www.caa.co.uk/commercial-industry/airspace/airspace-modernisation/airspace-modernisation-strategy/about-the-strategy/>

intend to progress this proposal. The CAA considers that the DPE proforma is fit for purpose and we are minded to retain it in its current format. The level of analysis required by change sponsors is driven by the wording of the DPs and Design Options.

### **Clarification regarding effect of post-consultation modifications on previous stages**

Clarification was sought regarding what modifications can be made post-consultation without a change sponsor having to re-do previous stages. We are of the view that this is already satisfactorily addressed in Stage 4 (Update and Submit) and will continue to be managed on a case-by-case basis.

## 7. Instrument Flight Procedures (IFP)

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### 7.1 Introduction

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As explained earlier in our theme on clarity, while stating that the airspace change process is too complex some stakeholders requested that more guidance and support be provided. The updating of CAP1616 presents us with an opportunity to add IFP references to all stages of the airspace change process to provide clarity for change sponsors regarding how the development of IFP design impacts the airspace change process. We are interested to hear your views on options regarding giving change sponsors more flexibility regarding the development of IFPs and the timing of the development and presentation of an IFP concept in the airspace change process. Given the need for IFPs to be designed in accordance with international standards and recommended practices, and relevant national legislation, it is not possible to scale-down the IFP requirements within the airspace change process.

### 7.2 High-level proposal: Clarify IFP design requirements / expectations

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The development of airspace structures or IFPs requires designers to follow and meet the requirement of a specific process, contained within 17 steps, not currently captured in CAP1616. Updating CAP1616 gives the CAA the opportunity to clarify how the development of IFP impacts the airspace change process and how it could ease the IFP design process for airspace changes. Exactly how this will be reflected in an updated CAP1616 will be dependent on the outcome of this consultation and the decisions we make with regards to the proposed options presented within the Stages, Steps and Gateways section earlier in this document.

#### Option 1: Provide flexibility with the development of IFPs

We propose giving more flexibility to change sponsors and their design organisations to undertake the flyability assessment of their IFP earlier in the airspace change process once their design options have been developed. This flexibility would not undermine the requirements a change sponsor must meet to the CAA's satisfaction at Stage 5 (Decide) of the airspace change process.

If we were to progress with this option, it would **benefit** change sponsors by providing them with the opportunity to plan the development of their IFPs in consideration of the complexity of their ACP. It would provide assurance that a change sponsor's ACP is technically viable and safe to be flown by aircraft before consulting their communities. Change sponsors could ensure their design organisation operates efficiently and provides qualitative IFP products (e.g., IFP designs).

In terms of **identified impacts**, change sponsors would be proceeding at risk as the result of their consultation could lead to the proposed design being amended. A flyability assessment of any amended design would be required at Stage 5 (Decide) before the CAA decides on the ACP. This option could have major financial consequences if there are amendments to the airspace design. This option would not address the complexity of Stage 2 (Develop & Assess) which is considered as being the most critical stage of the airspace change process in terms of developing viable design options.

## Option 2: Develop and present an IFP design concept

The development of IFP design requires a change sponsor to consider various technical factors in conjunction with the outcome of stakeholder engagement activity. This option proposes that change sponsors develop an IFP design concept and present it to the CAA prior to the development of their design options.

If we were to progress with this option, it would **benefit** change sponsors in facilitating the identification and demonstration of the viability of the options developed and presented at Stage 2 (Develop & Assess), while limiting the number of options presented at that stage. Designers would be involved in development of the airspace from the start of the airspace change process and would be able to influence the identification of the options. This option would make it easier for change sponsors to demonstrate the scope of the ACP and this in turn would assist change sponsors in conducting the requisite engagement and consultation activities. The option would help to clarify the ACP by the development of an airspace change concept.

In terms of **identified impacts**, with the requirement to develop a concept at an early stage of the airspace change process, designers would need to be involved from that point and the design process would be much longer than it currently is. There may be cost implications for change sponsors due to the additional work required at Stage 1 (Define). A high level of expertise in airspace design would be required to minimise risks at future stages of the airspace change process. Change sponsors would need to articulate and clearly explain the technical airspace concept. Flexibility in conducting IFP design activities would be reduced.

## Option 3: A mix between Option 1 and 2

This option provides the change sponsor with the opportunity to undertake the flyability assessment early in the airspace change process, at their own risk, and to develop a conceptual design at Stage 1 (Define) considering the advantages and disbenefits identified by the change sponsor alongside the technical factors that can influence the ACP.

If we were to progress this option, it would **benefit** change sponsors by providing them with the opportunity to plan the development of their IFPs in consideration of the

complexity of their ACP. It would provide assurance that a change sponsor's ACP is technically viable and safe to be flown by aircraft before consulting their communities. Change sponsors could ensure their design organisation operates efficiently and provides qualitative IFP products. At the same time this combined option would **benefit** change sponsors in facilitating the identification and demonstration of the viability of the options developed and presented at Stage 2 (Develop & Assess), while limiting the number of options presented at that stage. Designers would be involved in development of the airspace from the start of the airspace change process and would be able to influence the identification of the options. This option would make it easier for change sponsors to demonstrate the scope of the ACP and this in turn would assist change sponsors in conducting their engagement and consultation activities. The option would help to clarify the ACP by the development of an airspace change concept.

In terms of **identified impacts**, change sponsors would be proceeding at risk as the result of their consultation could lead to the proposed design being amended. A flyability assessment of any amended design would be required at Stage 5 (Decide) before the CAA decides on the ACP. This option could have major financial consequence in the event of amendments to the airspace design. With the requirement to develop a concept at an early stage of the airspace change process, designers would need to be involved from that point and the design process would be much longer than it is now. There may be cost implications for change sponsors due to the additional work required at Stage 1 (Define). A high level of expertise in airspace design would be required to minimise risks at future stages of the airspace change process. Change sponsors would need to articulate and clearly explain a technical airspace concept.

#### **Option 4: Do nothing**

This option retains the status quo proposing that the current regulatory framework provides sufficient clarity and information for the development of IFPs. Airspace consultants and Approved Procedure Design Organisations (APDOs) have the competencies to support change sponsors at different stages of airspace design development. The airspace change process is appropriately structured to ease the development of airspace designs in a coordinated, transparent, and proportionate manner. The airspace change process requires change sponsors to conduct engagement and consultation activities so that stakeholders can influence the development of viable options.

If we were to progress this option, it would **benefit** change sponsors by considerably limiting the risks of failure as the flyability assessment would continue to be conducted after the CAA's assessment of the IFP design at Stage 5 (Decide).

In terms of **identified impacts**, the current scenario of identification of technical activities at different stages of the airspace change process is not facilitated by the complexity of the airspace change process and impacts the development of qualitative IFP products in compliance with international standards. The CAA's decision-making period can be

extended beyond the 16-weeks decision timetable if the IFP design quality submitted by a change sponsor is poor and requires a flyability assessment, although the risk of this occurring is mitigated by the provision of guidance at different stages of the airspace change process. This option would not provide clarification for change sponsors regarding the development of IFPs, nor would it provide the flexibility offered by Option 1.

### **7.3 Rejected high-level proposals**

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No high-level proposals have been rejected regarding clarification of IFPs.

## 8. Temporary Airspace Changes / Airspace Trials

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### 8.1 Introduction

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Whilst most of the feedback received concerned the airspace change process for permanent ACPs, feedback was also sought on the temporary airspace change and airspace trials process. Change sponsors suggested that there was a need to provide an abridged and suitably scaled permanent airspace change process for any ACP moving from a temporary/trial to permanent status. They also felt that the environmental requirements needed to be more proportionate. The importance of meaningful engagement was highlighted, with some community/environmental representatives suggesting that all stakeholders should have the ability to comment on a temporary ACP or airspace trial. When producing the next version of CAP1616, we will ensure that:

- More clarity is provided regarding the scope and likely impact of a temporary ACP or airspace trial
- We enhance our definition of the extraordinary circumstances that are relevant to a proposed extension
- We explain the criteria used by the CAA to determine whether consideration of noise impacts is not required
- The guidance related to ‘monitoring complaints’ is separated from the regulatory requirements of the temporary airspace change and airspace trials process

When considering each theme, we initially developed ‘high-level proposals’ before developing specific options to address them. These are presented below, and we would welcome your feedback on these.



## 8.2 High-level proposal: Remove references to ‘consultation’ within the temporary airspace change process

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Currently, change sponsors are required to undertake targeted engagement or consultation with aviation stakeholders (specifically, that is airspace users, air navigation service providers and airports only) to investigate whether the temporary change will be safe and operationally viable. Given the temporary nature of the ACP, the stakeholders that need to be targeted and the limited scope of feedback being sought, the requirement to formally consult on any such ACP is disproportionate as it is unlikely to achieve anything beyond the conclusions that would be drawn through a process of targeted engagement. Consequently, we are interested to hear your views on the removal of references to ‘consultation’ from the temporary airspace change process. We are not proposing to remove the requirement to ‘engage’ with aviation stakeholders. This proposal focusses solely on the reference to ‘consultation’, as this sets a legitimate expectation for stakeholders which for the reasons highlighted above is disproportionate.

## 8.3 High-level proposal: Criteria for determining whether communities are affected and requirement to inform them accordingly

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The airspace change process for temporary ACPs and airspace trials places a requirement on the change sponsor to inform affected communities prior to the relevant changes being implemented (if approved). CAP1616 currently defines specific criteria that should be applied to identify relevant communities for airspace trials, but not for the temporary airspace change process. It is our intention to replicate the airspace trials requirements on to the temporary airspace change process. This means that change sponsors would have to use 65 dB LAmax footprints to help them identify relevant communities to address the engagement requirements for the temporary airspace change process. We are interested to hear your views on this proposal.

We are also aware of a slight inconsistency in the engagement requirements, when cross-checking the content of the temporary airspace change and airspace trials process with the content of related text in Appendix B (environmental metrics and assessment requirements). The former states that it is vital to inform communities prior to implementation, whereas the latter states that they must be informed before a decision is taken by the CAA about implementation. To align the engagement requirements with the contents of the overarching Air Navigation Guidance 2017<sup>11</sup>, we propose to rectify this inconsistency and make it clear that change sponsors are required to inform relevant communities prior to implementation, if indeed the proposal has been approved by the CAA.

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<sup>11</sup> Air Navigation Guidance 2017

## 8.4 High-level proposal: Broadening noise assessment requirements for a temporary ACP/airspace trial where a permanent ACP is likely to follow

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The Air Navigation Guidance states that “extensions beyond the initial agreed period will need careful consideration by the CAA and should not be granted simply to minimise the amount of effort required by the change sponsor when pursuing the full airspace change approval process”. The current environmental assessment requirements only include noise, on the basis that other environmental impacts are negligible over a short-term. In any instance where a change sponsor is pursuing a temporary ACP/airspace trial alongside or in advance of a permanent ACP covering the same volume of airspace, we intend to broaden the environmental assessment requirements to include those environmental factors required for a permanent change as the rationale to scope out these impacts based on them being negligible over a short-term is no longer valid. Examples of the environmental assessment requirements include CO<sub>2</sub>, local air quality, and tranquillity. We are interested to hear your views on this proposal.

## 8.5 Rejected high-level proposals

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The following high-level proposals were suggested in response to the ‘Engagement, Consultation and Communications’ theme. Having considered each one carefully, we determined not to progress these, and our rationale for doing so is set out below.

### **Introduce a pre-engagement Gateway for temporary ACPs**

The temporary airspace change process requires the change sponsor to carry out targeted engagement or consultation with aviation stakeholders (specifically, that is airspace users, air navigation service providers and airports only) to investigate whether the temporary change will be safe and operationally viable. It was suggested that a pre-engagement Gateway should be added to the temporary airspace change process to introduce a mandatory requirement for the CAA to review and assess a change sponsor’s engagement strategy and related materials prior to them approaching relevant stakeholders. Given the short-term nature of temporary ACPs, we feel this would be disproportionate and therefore do not intend to progress this proposal. However, we will ensure that our current practice of facilitating an optional review of any such documentation will be reflected in an updated version of CAP1616.

### **Engage community stakeholders**

As detailed above, targeted engagement or consultation is required with aviation stakeholders (specifically, that is airspace users, air navigation service providers and airports only) to investigate whether the temporary change will be safe and operationally viable. Where a temporary ACP/airspace trial is likely to alter traffic patterns below 7,000 feet, the change sponsor is required to inform communities that may be affected prior to implementation. It was suggested that communities should have a greater ability to

influence the outcome as opposed to simply being informed, and therefore that the temporary airspace change/airspace trials process should place a requirement on the change sponsor to engage with aviation stakeholders and communities. Given the short-term nature of temporary ACPs and the limited scope of the engagement requirement (safety and operational viability), we feel this would be disproportionate and therefore do not intend to progress this proposal.

### **Introduce an abridged permanent airspace change process for temporary ACPs/airspace trials**

CAP1616 currently states that change sponsors are required to “go through the full airspace change process” should they wish to pursue a permanent or long-term arrangement beyond the temporary airspace/airspace trial. Change sponsors and aviation consultancy firms felt that this was disproportionate and that an abridged permanent airspace change process should be developed and applied in any such instance. Given the short-term nature of what is being proposed, the temporary airspace change/airspace trials process reflects a significantly scaled-down version of the permanent airspace change process, as it does not include the environmental and economic assessment requirements. These would absolutely need to be considered when progressing a permanent airspace change and therefore, we do not intend to progress this proposal. However, we will recognise the outputs from a temporary airspace change/airspace trial and explain how these could be used to support the development of a permanent ACP, and potentially scale-down the requirements of the airspace change process, within an updated version of CAP1616.

## 9. Next Steps

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### 9.1 What happens next?

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Following the end of the consultation period, responses will be analysed, and a consultation report will be produced. We will then consider the results of our analysis and decide what updates should be made to the next version of CAP1616.

Once this has happened, we will publish the next version of CAP1616 and share it via our communication channels. We expect the updated version to be ready in Q2 2023.

Throughout this review, we remain committed to keeping stakeholders informed and will continue to ensure that our dedicated review webpage ([www.caa.co.uk/review-of-CAP-1616](http://www.caa.co.uk/review-of-CAP-1616)) reflects the latest status of the review. All stakeholders are encouraged to monitor this webpage to ensure they keep abreast of further developments.

### 9.2 Transition arrangements

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We recognise that there might be changes to CAP1616 that could impact change sponsors currently engaged in the airspace change process. As our decisions will be influenced by the outcome of this consultation, we are not currently able to fully understand how CAP1616 might change. However, we expect any impact to be negligible as we do not believe that any such changes would undermine work already completed by change sponsors of in progress ACPs. We intend fully setting out how any impacts will be addressed once the changes have been finalised.

### 9.3 Consequential Impacts

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The CAP1616 airspace change process is referenced in multiple CAA publications. Depending on the outcome of the CAP1616 Review, there may be a need to update these publications to ensure they are completely aligned with the revised version of CAP1616. There may also be a need to revise the Airspace Change Portal to reflect any modifications made to the airspace change process. While we will ensure this is completed at the earliest possible opportunity, it may take some time to complete the necessary updates and publish them accordingly.

## APPENDIX A - GLOSSARY

**Advanced Air Mobility (AAM)** - Air transportation services for people and/or cargo between places - local, regional, intraregional, urban – using revolutionary new aircraft.

**Aerodrome Traffic Zone (ATZ)** - normally circular zones around an aerodrome where pilots and ATS providers must follow specific requirements.

**Aeronautical Information Publication (AIP)** – Contains information essential to air navigation, including the detailed structure of airspace and flight procedures.

**Air Navigation Guidance (ANG)** - Guidance to the CAA on its environmental objectives when carrying out its air navigation functions, and to the CAA and wider industry on airspace and noise management, October 2017, Department for Transport Guidance from the Secretary of State which the CAA is required to take account of when considering ACPs. <https://www.gov.uk/government/publications/uk-air-navigation-guidance-2017>

**Air Navigation Service Provider (ANSP)** - An organisation which operates the technical system, infrastructure, procedures, and rules of an air navigation service system, which may include air traffic control.

**Airspace Change Organising Group (ACOG)** - An independent organisation within NATS formed under the direction of the Department for Transport and the CAA to coordinate the delivery of key aspects of the Airspace Modernisation Strategy.

**Airspace Change Proposal (ACP)** - A request (usually from an airport or air navigation service provider) for a permanent change to the design of UK airspace.

**Airspace Classification** - Airspace classifications are defined by the International Civil Aviation Organization. In the UK, controlled airspace will normally be Class A, C, D or E. The normal default background classification will be Class G, unless flight safety or air traffic management reasons require a higher classification.

**Airspace Masterplan** - A high-level implementation plan that identifies which individual, but interdependent, airspace design changes need to be developed to deliver the range of benefits that modernisation will bring to the UK.

**Airspace Modernisation Strategy (AMS)** - A co-ordinated strategy and plan for the use of UK airspace for air navigation up to 2040, including for the modernisation of the use of such airspace, prepared and maintained by the CAA, incorporating the previous Future Airspace Strategy. It is a requirement of the Air Navigation Directions 2017.

<https://www.caa.co.uk/Commercial-industry/Airspace/Airspace-Modernisation-Strategy/About-the-strategy/>

**Airspace Trials** – Changes to the notified airspace design to investigate, validate and test an innovative airspace design, technology, or air traffic control operational procedure.

**Air Traffic Control (ATC)** - Service from an air navigation service provider providing guidance to aircraft through controlled airspace

**Altitude based priorities** - A system incorporated in the Government's guidance to the CAA designed to ensure that potential noise impacts are prioritised in airspace change decisions up to 7,000 feet above sea level, in line with Government's overall policy on aviation noise.

**Approved Procedure Design Organisation (APDO)** - An organisation that has met the competency requirements laid down by the CAA and holds an approval for the design of instrument flight procedures, which are under the jurisdiction of the CAA.

**Assessment meeting** - Drawing from the Statement of Need, the assessment meeting allows the change sponsor to discuss with the CAA the issues giving rise to the proposed change, how the change will address those issues, and how the change sponsor intends to proceed. This will include the potential merits of the proposed airspace change, for example in terms of safety, efficiency, providing environmental benefits or mitigating its environmental impact to the greatest extent possible.

**Baseline** - Scenario in analysis of different options where the impacts of the change not being implemented are analysed (also known as 'do nothing' or 'do minimum' option).

**Beyond Visual Line of Sight (BVLOS)** - the operation of an unmanned aerial system without the need or ability to keep the aircraft within view.

**Biodiversity** - The variability among living things from all ecosystems (including terrestrial, marine, and other aquatic among others) and the ecological complexes of which they are part; including diversity within species, between species and of ecosystems.

**CAA** – The Civil Aviation Authority. We are the UK's specialist aviation regulator. We are the primary decision maker and are responsible for administering the airspace change process.

**CAP1616** – CAP (Civil Aviation Publication) 1616 is the document which explains the CAA's regulatory process for changes to airspace design.

**Citizen Space** - Online consultation tool used to host all airspace change related consultations.

**Change sponsor** – The 'owner' of the ACP responsible for ensuring it is progressed in accordance with the airspace change process.

**Community noise group** – These are groups created to address and gather views on community noise concerns

**Consultation** - Formal process seeking input into a decision, undertaken in line with the Gunning Principles, and government guidance.

**Continuous Climb (or Descent) Operations (COO/CDO)** - Allow arriving or departing aircraft to descend or climb continuously, to the greatest extent possible.

**Critical Success Factors (CSF)** - the attributes outlined in the Green Book that any successful ACP must have, if it is to achieve successful delivery of its objectives.

**Cumulative impacts** - the effect of multiple ACPs on stakeholders.



**Design options** - Options developed by the change sponsor that address the Statement of Need and that align with the design principles that are then assessed and compared through a process of options appraisal.

**Design principles (DPs)** - The principles encompassing the safety, environmental and operational criteria, and the strategic policy objectives that the change sponsor seeks to achieve in developing the ACP. They are an opportunity to combine local context with technical considerations and are therefore drawn up through discussion with affected stakeholders.

**Design Principle Evaluation (DPE)** - An evaluation by the change sponsor of how its design options have responded to the DPs.

**Do-minimum** - Where doing nothing is not a feasible option, the change sponsor's informed view of the future and the minimum changes required to address the issues identified.

**Do nothing** - A reflection of the current-day scenario, although taking due consideration of known or anticipated factors that might affect that baseline, for example a planned housing development close to an airport, forecast growth in air traffic, or expected changes in airlines' fleet mix.

**Drone** - Commonly used term for an unmanned aerial system or vehicle (UAS or UAV), a powered aircraft without a human pilot on board. Drones may be remotely piloted (also known as a remotely piloted air system or RPAS) or autonomous. Drones range from relatively large aircraft similar in size and complexity to an aircraft with a pilot on board to much smaller hand-held types with minimal payload, such as those for recreational use.

**Engagement** - Catch-all term for developing relationships with stakeholders, covering a variety of activities including but not limited to consultation, information provision, regular and one-off meetings and fora, workshops, and town hall discussions.

**Flyability assessment** - an activity conducted in a flight simulator or an aircraft to determine that an instrument flight procedure is safe and flyable by the anticipated range of aircraft types in various weight, speed, and centre of gravity configurations, and in various weather conditions.

**Free Route Airspace (FRA)** - The removal of all established routes from the upper airspace, allowing aircraft to follow the most efficient flightpath to their destination using intermediate points only when necessary.

**Future Airspace Strategy Implementation Programme (FASI)** - Initiative required to achieve the Airspace Modernisation Strategy (AMS) objective. The programme encompasses the requirement to fundamentally redesign the airspace system at lower altitudes and in the terminal airspace that serves commercial air transport across the busiest regions of the UK.

**Gateways** – Included within the process to track the development of an ACP through the process and give greater certainty that it is being followed correctly.

**General Aviation (GA)** - Essentially all civil flying other than commercial airline operations, which therefore encompasses a wide range of aviation activity from powered

parachutes, gliding and ballooning to corporate business jets, and includes all sport and recreational flying.

**Green Book** - “The Green Book: appraisal and evaluation in central government” is HM Treasury’s guidance for public sector bodies on how to appraise ACPs before committing funds to a policy, programme, or project.

**Independent Commission on Civil Aviation Noise (ICCAN)** - The independent UK body responsible for creating, compiling, and disseminating best practice to the aviation industry on the management of civil aviation noise and advising government in this area.

**Instrument Approach Procedure (IAP)** - A set series of aircraft manoeuvres from the initial approach to landing.

**Instrument flight procedures (IFP)** – Procedures designed to international/national criteria, published in the UK AIP, flown by aircraft, and most usually associated with arrival at or departure from an airport.

**International Civil Aviation Organisation (ICAO)** - The agency of the United Nations responsible for international standards for aviation which the UK is bound by international treaty to implement.

**Judicial Review** – A type of court proceeding in which a judge reviews the lawfulness of a decision or action made by a public body. A judicial review is a challenge to the way in which a decision has been made, rather than the rights and wrongs of the conclusion reached. The court will not substitute what it thinks is the “correct” decision.

**L<sub>Amax</sub>** – The maximum A-weighted sound level (in dBA) measured during an aircraft fly-by.

**Leq contours** – A basic measure for assessing noise impact which means the equivalent continuous sound level. This is the average sound level for a specific location over a defined measurement period.

**Levels** – The CAA categorises proposals for a permanent change to the airspace design into four ‘Levels’ depending on the characteristics of the change. For each Level we then apply the requirements of the process in a proportionate way.

**Local representative organisation** – Local stakeholder group that gathers the views of those it represents.

**National representative organisation** – National stakeholder group that gathers the views of those it represents.

**Notified airspace design** – the airspace structure and flight procedures published in the UK.

**Nx contours** - the locations where the number of events (i.e. flights) exceeds a pre-determined noise level, expressed in dB L<sub>Amax</sub>.

**Options Appraisal** – A means of assessing the possible different approaches for delivering a desired outcome. As a high-level objective, a comprehensive list of options is derived, which is then whittled down through a shortlist to the optimal option for delivery.



At the core of an options appraisal is an assessment of the cost and benefits of the ACP. As part of the analysis, the change sponsor is required to put as many costs and benefits as possible into monetary terms, to allow for a direct comparison between options. When quantification of costs and benefits may not be possible or proportionate, a qualitative description of the costs and benefits can be used. The appraisal must use WebTAG, the Department for Transport's appraisal guidance, for health impacts associated with noise and potentially for other impacts where possible.

**Overflight** – For the purposes of airspace changes, overflight is defined according to the CAA's report, CAP1498 which outlines a measurement based upon community perception. It does not portray noise impacts.

**Performance – Based Navigation (PBN)** - A concept developed by International Civil Aviation Organisation (ICAO) that moves aviation away from the traditional use of aircraft navigating by ground-based beacons to a system more reliant on airborne technologies, utilising area navigation and global navigation satellite systems.

**Permanent airspace change process** – The process followed for permanent changes to the notified airspace design.

**Planned and Permanent Re-distribution of air traffic (PPR)** - A category of airspace change, where there is no change in airspace design, but there is a planned and permanent redistribution of air traffic through changes in air traffic control operational procedure. "Planned and permanent" means other than a day-to-day or at the time decision taken by an air traffic controller or other decision-maker.

**Portal** - The CAA's airspace change portal – an online portal containing details of all current and previous airspace changes, including the ability to respond to consultations. <https://airspacechange.caa.co.uk>.

**Post-implementation review (PIR)** - The CAA reviews how the airspace change has performed, including whether anticipated impacts and benefits in the original ACP and decision have been delivered.

**Public Evidence Session** – An opportunity for stakeholders other than the change sponsor to provide the CAA with their views on the ACP directly, in a public forum.

**Regulatory requirements** – The various requirements set out in the CAA's airspace change process

**Remotely piloted aircraft system (RPAS)** - A powered aircraft without a human pilot on board which is piloted remotely, also known as an unmanned aerial system or vehicle (UAS or UAV).

**Required Navigation Performance (RNP)** - Type of performance-based navigation. See performance-based navigation.

**Respite** – Planned and notified periods where overflight or noise impact are reduced or halted to allow communities undisturbed time.

**Secretary of State call-in** - If a request is made for the Secretary of State to call-in an ACP, the Secretary of State may determine that the ACP should be decided by them

rather than by the CAA. The Secretary of State must be satisfied that any one of four call-in criteria apply.

**Spaceport operators** - A person or organisation authorised by means of a spaceport licence to operate a spaceport.

**Spaceport** - A site from which spacecraft or carrier aircraft can be launched or a site at which controlled and planned landings of spacecraft can take place. Spaceports can be licensed for vertical or horizontal launches (or potentially both).

**Stages** – The airspace change process is broken down into seven–stages, individually numbered and named, for example, Stage 1 – Define.

**Stakeholder** – An interested individual or group.

**Statement of need** - The means by which the change sponsor of an airspace change proposal sets out what airspace issue or opportunity it is seeking to address and what outcome it wishes to achieve, without specifying solutions, technical or otherwise.

**Steps** – Some of the seven–stages are broken down into steps, which are individually numbered and named, for example, Step 1A (Assess Requirements) and Step 1B (Design Principles).

**Transport Analysis Guidance (WebTAG)** - Department for Transport options analysis and modelling tool and associated guidance.

**Temporary airspace change process** – The process followed for temporary changes (no longer than 90–days) to the notified airspace design.

**Trade-offs** - a situation where a compromise is required between two conflicting objectives, for example if an option results in an increase in the number of people overflowed but also results in a decrease in significant adverse impacts from aircraft noise. Some trade-offs are the subject of over-arching government policy, such as the altitude-based priorities, which determine how competing environmental priorities should be handled.

**Tranquillity** - There is no universally accepted definition of tranquillity and therefore there is no accepted metric by which it can be measured. In general terms it can be defined as a state of calm. The consideration of impacts upon tranquillity for airspace changes is with specific reference to National Parks and Areas of Outstanding Natural Beauty (AONB), plus any locally identified ‘tranquil’ areas that are identified through community engagement and are subsequently reflected within an airspace change proposal’s DPs.

**Transparent** – the airspace change process should be clear and easy to understand, whilst being open to all stakeholders.

**Unmanned Aerial System (UAS)** - A powered aircraft without a human pilot on board, which may be remotely piloted (also known as a remotely piloted aircraft system or RPAS or autonomous).

**WebTAG** – see Transport Analysis Guidance.

## APPENDIX B - CONSOLIDATED LIST OF CONSULTATION QUESTIONS

### About you.

1. Are you responding as a:

- Resident affected by aviation
- Member of the general aviation community
- Change sponsor (inc. airports)
- Airspace change consultancy
- Central of local government body
- Military
- Councillor or MP
- National representative organisation
- Local representative organisation
- Community noise group
- Other (please specify below):

2. What type of sponsor or consultancy are you?

- Air Navigation Service Provider
- Airport
- Space industry
- Unmanned Aerial System/Remotely Piloted Aircraft System
- Airspace management/design consultancy
- Approved Procedure Design Organisation
- Other (please specify below):

**Simplifying the structure of CAP1616.**

3. Please indicate if you agree, disagree or are not sure about the options.

	Agree	Disagree	Not Sure
Option 1: Produce separate publications(s) for related guidance	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Option 2: Produce separate publications for different parts of CAP1616	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Options 3: Create distinct sections within CAP1616 for different types of ACP or by scaling levels	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Option 4: Rename Parts- We could easily remove the numbering so that each part of the document simply includes a title	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Option 5: Do Nothing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

4. Please tell us how the options described above may impact you (either positively or negatively)?

**Make modifications to the scaling levels.**

5. Please indicate if you agree, disagree or are not sure about the options:

	Agree	Disagree	Not Sure
Option 1: Modify the scaling levels	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Option 2: Extend the definition of Level 0	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Option 3: Do Nothing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**Assessment of baseline.**

6. Please indicate if you agree, disagree or are not sure about the following options:

	Agree	Disagree	Not Sure
Option 1: The current day scenario (baseline) should be fully described at Stage 1 (Define)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Option 2: Do Nothing- The requirement to fully describe and assess the baseline remains at Step 2B (Options Appraisal)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

7. Please tell us how any of the high-level proposals for scaling may impact you (positively or negatively). You can also use this space to explain or express thoughts about your responses to questions in this section.

**Review/clarify DP requirements.**

8. Please indicate if you agree, disagree or are not sure about the options below:

	Agree	Disagree	Not Sure
Option 1: Inclusion of mandatory (core/required) and discretionary (optional/suggested) design principles	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Option 2: Requirement to test the DPs at each stage of the Options Appraisal	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Option 3: Do nothing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

9. Please tell us whether, in principle, you agree with the proposal for removal of requirements (development of DPs, design options and/or application of the options appraisals process) for certain types of ACPs.

- Yes- I agree with this proposal
- No- I do not agree with this proposal
- Not Sure

10. Which type of ACP do you think the removal of the requirements above could apply to?

**Remove requirement to develop a 'comprehensive list' of design options which includes 'radical options'.**

11. Should we remove the requirement to develop a 'comprehensive list' of design options (including 'radical options')?

- Yes
- No
- Not Sure

12. Should we remove the requirement for engagement in Stage 2?

- Yes
- No
- Not Sure

13. Please use this space to explain or express thoughts about your responses to the questions about high-level proposals to remove/review the requirement for comprehensive list of options and engagement in Stage 2.

14. Please tell us your views on proposals to introduce a checklist of requirements for sponsors separated by regulatory areas for each stage of the ACP process.

**Modification of ACP stages, steps and gateways.**

15. Please indicate if you agree, disagree or are not sure about the options below:

	Agree	Disagree	Not Sure
Option 1: Remove Stage 1 gateway and move requirements into single gateway at end of Stage 2 (Develop and Assess).	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Option 2: Move Step 1B (Design Principles) into Stage 2 (Design Options), with a single gateway assessment meeting at the end of Stage 2 .	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Option 3: Move Step 2A (Options Development and Design Principle Evaluation) into Stage 1 (Define) as a new Steps 1C and Step 1D	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Option 4: Combine Steps 2A (Options Development) and 2B (Options Appraisal) to create simply Stage 2 (Develop and Assess)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



16. Please indicate if you agree, disagree or are not sure about the options below:

	Yes	No	Not Sure
Option 5: Remove Step 3D (Collate and Review Responses) from the airspace change process and move current Step 3D requirements to Step 4A (Update Design)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Option 6: Combine Steps 4A (Update Design) and 4B (Submit ACP) within Stage 4	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Option 7: Move requirement to define baseline to Stage 1 (Define) (quantifying where applicable)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Option 8: Do nothing- no changes to the CAP1616 stages, steps and gateways as currently described.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

17. Should we consolidate the options appraisal requirements for certain ACPs?

- Yes
- No
- Not Sure

18. Please tell us why you have responded in this way.

19. Do you have any suggestions about the content or placement of flowcharts in the revised airspace change process (CAP1616)?

20. Please tell us how any of the high-level proposals for stages, steps and gateways may impact you (positively or negatively). You can also use this space to explain or express thoughts about your responses to questions in this section.

**Establish dedicated CAA-point of contact for ACP-related enquiries.**

21. Should we have a dedicated CAA point of contact for stakeholders on ACP related enquiries?

- Yes
- No
- Not Sure

22. Can you tell us what the impact (positive or negative) would be if we were to establish a dedicated point of contact for ACP related enquiries?

**ICCAN Consultation Toolkit.**

23. We want to identify which aspects of advice on consultation practice from the toolkit to retain, if any. Please tell why which aspects of the advice you think we should retain and why in the box below.

**Categorisation of consultation responses.**

24. Should the guidance on categorisation in the airspace change process (Appendix C, Table C2 of CAP1616) be retained?

- Yes
- No
- Not Sure

**Remove any reference to 12-weeks being the 'accepted standard' for consultation.**

25. Should we remove the requirement for an accepted standard of 12 weeks?

- Yes
- No
- Not Sure

**Transfer the responsibility of moderating/publishing consultation responses from CAA to change sponsor**

26. Do you agree or disagree with the proposal to transfer the responsibility of moderating/publishing consultation responses from CAA to change sponsor?

- Yes
- No
- Not Sure

27. Please use the box below to tell us what the impact would be on you (positive or negative) if we were to remove the requirement for an accepted standard of 12 weeks and place responsibility for moderation on consultation to the sponsor.

**Better use of airspace change portal/CAA website.**

28. Please tell us how we could improve our Airspace Change Portal and/or our website to make it easier to understand and follow.

**Clarify assessment requirements.**

29. Please indicate if you agree, disagree or are not sure about the options below.

	Agree	Disagree	Not Sure
Option 1: Providing templates for the baseline data collection, environmental assessments, options appraisals	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Option 2: Stating assessment requirements for permanent and temporary ACPs concerning new entrants (Space Operators/UAS)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Option 3: Add requirement to analyse 'other costs' which may arise for airports/ANSPs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Option 4: Do nothing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**Introduction of guidance meetings at key points in the airspace change process and requirement for change sponsor-led briefing at point of submission (Gateways and Stage 4 - Update and Submit).**

30. Please use the space below to tell us your views on the suitability of guidance meetings at key points in the ACP process. You can also use this space to tell us more about your views on the suitability of sponsor-led briefing meetings at key points in the ACP process.

**Review of guidance contained within Stage 6 (Implement) and AIXM (Aeronautical Information Exchange Model).**

31. We will review the guidance provided within Stage 6 of the CAP1616 airspace change guidance. Is there anything you think we should consider when reviewing Stage 6? Sponsors can also use the response box below to tell us what the impact may be of the change to Aeronautical Information Exchange Model (AIXM) format for AIP entry.

**Provision of airspace change scope flowchart.**

32. We would welcome your views on whether an airspace change scope flowchart should be developed and introduced:

**Clarify decision criteria.**

33. Would examples of types of characteristics (similar to the one provided in Table G1 in Appendix G of the CAP1616 process) be useful to change sponsors to gauge to what extent their proposal is consistent with the Airspace Modernisation Strategy?

- Yes
- No
- Not Sure

Please tell us why you have responded in this way.

**Instrument Flight Procedures (IFP).**

34. We recognise that IFP is a technical subject that some respondents may not wish to give responses on. Do you wish to give your views about IFP?

Yes

No

**Clarify IFP design requirements/expectations.**

35. Please indicate if you agree, disagree or are not sure about the options below.

	Agree	Disagree	Not Sure
Option 1: Provide flexibility with the development of IFPs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Option 2: Develop and present an IFP design concept	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Option 3: A mix between Option 1 and 2	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Option 4: Do Nothing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

36. Please tell us why you have responded in this way?

**Temporary Airspace Changes/Airspace Trials.****Remove references to 'consultation' within the temporary airspace change process.**

37. We propose all references to 'consultation' within the temporary airspace change process to be removed. Please tell us about your views on this proposal in the box below:

38. Please give us your views on proposals to replicate the requirements of the airspace trials process on to the temporary airspace change process. Should we introduce the requirement to use 65 dB LAmax footprints within the temporary airspace change process?

- Yes
- No
- Not Sure

39. Please give us your views on proposals to broaden the noise assessments for temporary ACPs/trials (when a permanent change is likely to follow). How will this proposal impact you (positively or negatively)?

**Rejected Options.**

40. The consultation document details options that we have rejected at this stage. We are keen to understand, what impacts and effects the removal of any of the options described will have on you or your stakeholders. Please use the box below to tell us of any impacts (positive or negative):



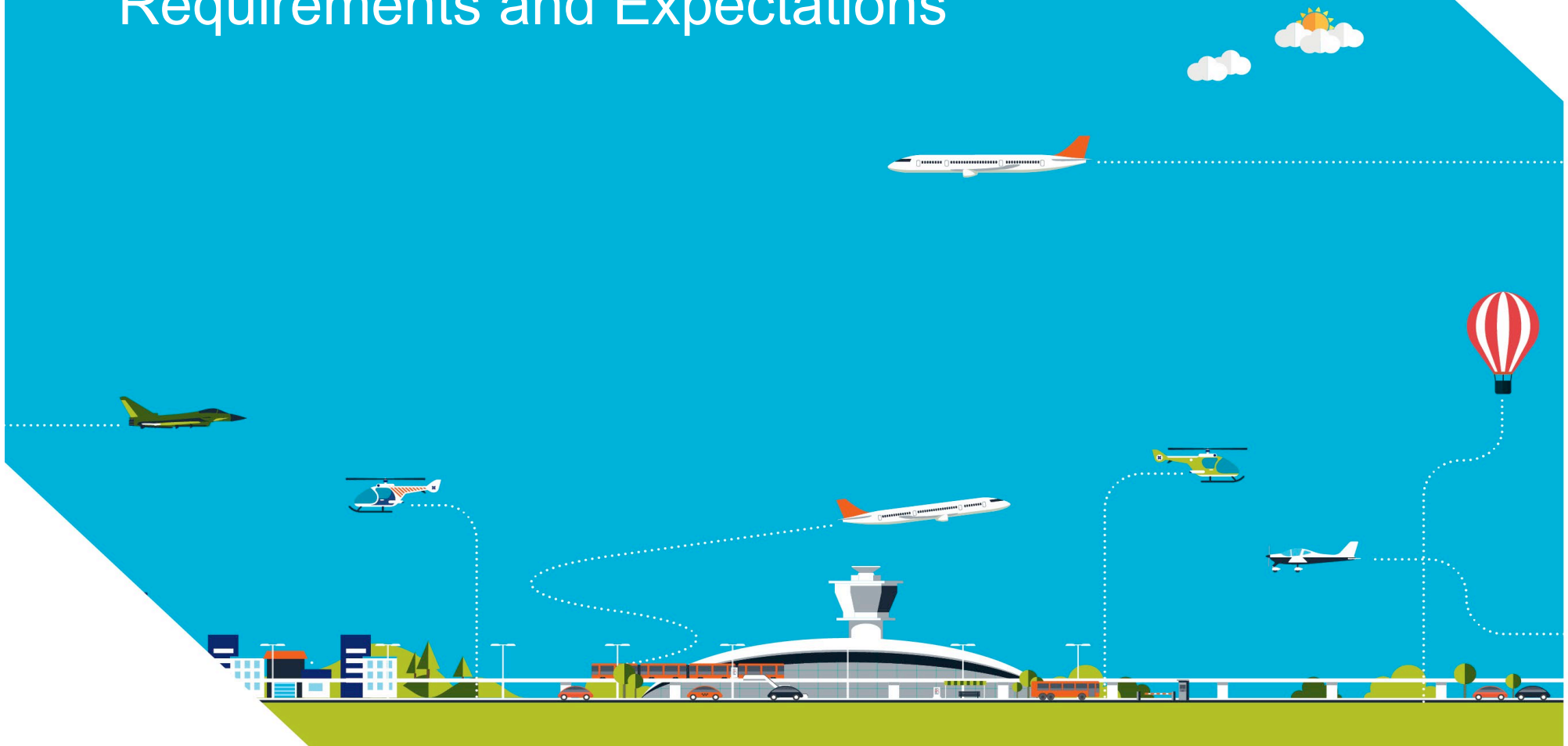
**Alternative or Additional Options.**

41. Are there any additional options you would suggest? Please use the space below to describe them and why you would like to see them in place.

42. Are there any other comments you'd like to share with us with regards to the CAP1616 Airspace Change process? Please share them below:

# CAP1616 Review

## Stage 2 - Clarification on the Regulatory Requirements and Expectations



# Purpose of this document

Following analysis of CAP1616 feedback and a review of proposals that did not initially progress through the Stage 2 (Develop & Assess) Gateway, the CAA has prepared this presentation for change sponsors to clarify the regulatory requirements of this stage of the airspace change process. This includes a focus on areas where the CAA has identified opportunities for improvement in submissions.

These slides are provided for informational purposes only. They summarise the requirements contained in CAP1616 and are not intended to be a substitute for that procedure. The slides show some ways of meeting the policy requirements of CAP 1616 but there may be other ways of doing so. Should you require further detailed clarification on any of the requirements, please contact your ACP point of contact and/or the [airspace.policy@caa.co.uk](mailto:airspace.policy@caa.co.uk) mailbox.



# How to use this document

- Please ensure you read the guidance set out in CAP1616 on [Stage 2: Develop and Assess](#) ahead of reading this document.
- This document is best explored at the end of Stage 1, before embarking on Stage 2.
- When you are approaching Steps 2A and 2B, consider the information contained in this document.
- Ensure that you read corresponding hyperlinked CAP1616 guidance where appropriate.



# Stage 2 – Steps explained

The diagram is an overview of the Stage 2 process. It frames the advice in this clarification document.

## Step 2A: Develop all options and Conduct a Design Principle Evaluation (DPE)

Step 2A starts with understanding the current-day situation (i.e. the baseline) and then developing options that meet the Statement of Need (SoN) and Design Principles (DPs). The baseline must be included alongside the list of options.

In the DPE, options are tested against the DPs from Step 1B. This happens through a process of engagement with stakeholders. At the end of this Step, any option subsequently found not to meet the SoN and/or the DPs can be discounted and all other options are taken forward to Initial Options Appraisal (IOA).



## Step 2B: Conduct an Initial Options Appraisal (IOA)

Once the DPE has been completed, the first phase of options appraisal can be conducted. In this Step, those remaining options are compared against the baseline and tested against a number of factors, including safety, environment and economic. All options must be compared against the baseline.



## What is the comprehensive list of options?

The ‘comprehensive list of options’ is a list of all possible scenarios that will address the issues and opportunities set out in the SoN (Statement of Need) and aligning with the DPs. It is as long or short as it needs to be. It could include the different types of options described below and on the next slide.

## What types of options are there?

At this stage, during the brainstorming exercise, a list of options is developed. The starting point of this list is a clear description of the current situation, also known as Do Nothing. Based on the current situation, the other options are developed and these can range from a Do Minimum, to a Do Something and even possibly ending with a Do Maximum depending on the nature of the change and how far the sponsor wants to go. A description of the main differences between these options is provided in the table below.

Current-day situation (aka Do Nothing)	Option 1: Do Minimum	Option 2: Do Something	Option 3: Do Something	Option 4: Do Maximum
This option must be described and quantified to provide a clear and well understood benchmark for subsequent options. Please refer to Slide 11 and 12 for more details.	This option represents the minimum changes necessary to address another requirement e.g. a legal obligation. This option rarely is the preferred option because it does not always deliver all the elements described in the SoN.	This option provides a greater level of improvement compared to the current situation. Most of the time it is the preferred option and delivers the best balance of costs and benefits.	This option provides a greater level of improvement compared to the current situation. Most of the time it is the preferred option and delivers the best balance of costs and benefits.	This option often goes above and beyond the SoN (e.g. radical options). It is rarely the preferred option because it can incur higher costs than benefits. Sponsors may wish to explore such options to make their options development as transparent as possible.



# Step 2A – Developing options

## What happens next?

Once the sponsor has clearly articulated and understood the current-day situation (i.e. the baseline), the next step is to develop the list of options. The baseline is used as a benchmark to measure the impacts that the proposed airspace change might have on community, airspace users, environment, ANSP etc.

**The current situation (Do Nothing option)** is the natural candidate to be used as the baseline and provides a clear description of the current impacts. Do Nothing allows for like-for-like comparison and provides stakeholders with a clear description of how today might change with future changes.

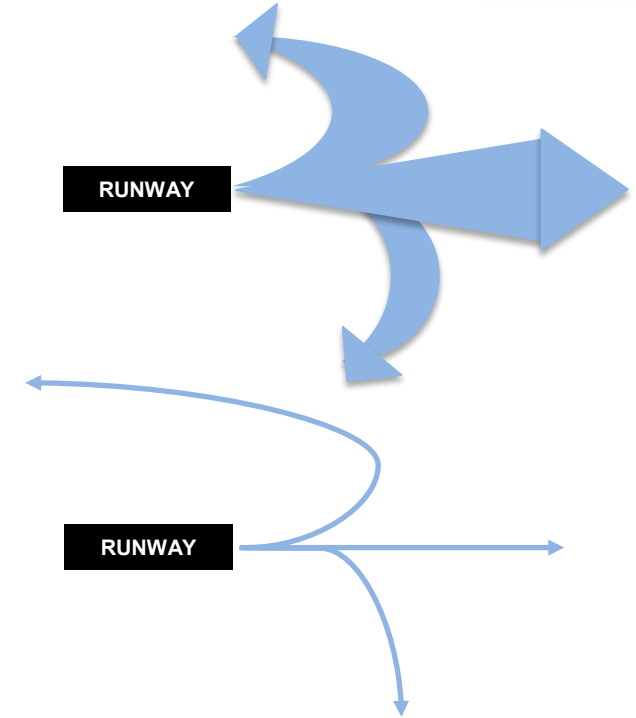
In certain cases, the change sponsor cannot continue with its current-day scenario (i.e., 'do nothing') because, for example, there is a legal or international obligation to change or upgrade the airspace (e.g., mandatory deployment of performance-based navigation at certain airports). This means that there is an external requirement to modify the current-day scenario even if the proposed change isn't implemented. When this happens, the change sponsor must set out the minimum changes required to address the issues identified based on an informed view of the future – this represents the 'do minimum' option. In this case, the Do Minimum will act as secondary baseline, alongside the Do Nothing baseline, allowing for the like-for-like comparison.



# Step 2A – Developing options

## How to present options?

- **Conceptual option(s) (swathes)** - Change sponsors may want to consider describing the options presented at Stage 2 conceptually at a high-level. This can be useful for large and complex projects, especially those that share interdependencies with other projects (e.g. the Masterplan Programme), where it is necessary to evaluate different conceptual solutions. Presentation of conceptual options can provide enough detail for the concepts to be evaluated qualitatively through the DPE and IOA, and those showing potential can be refined and quantified further.
- **More detailed option(s) (lines)** - For smaller projects where there are only a limited number of permutations, change sponsors may want to consider more detailed options. However, providing too much detail can be counter-productive if it is perceived by stakeholders as being less flexible.
- **Radical option(s)** - Radical options demonstrate transparency of options development. They show that everything has been considered (even extreme options) in the development of options





# Step 2A – Conduct the DPE

## What is the purpose of the DPE?

The change sponsor is required to produce a DPE which sets out how the design options have responded to the design principles. The DPE will help the change sponsor identify the options that meet certain number of factors, including safety, environment and economic and are progressed to the IOA.

## What should be contained within the DPE?

The DPE should follow the standardised format set out in [Appendix E of CAP1616](#). In it, the change sponsor must provide a qualitative assessment of each option and indicate whether it has met, partially met or not met each DP.

## What does the CAA look for in the evaluation of Design Principles (i.e. the DPE)?

When evaluating whether options have met design principles, the sponsor should aim for the following:

- **A description of the methodology for evaluation:** This should help to demonstrate consistency and fairness of assessment of each option.
- **A demonstration of how feedback has influenced evaluation:** If for example, a stakeholder mentions a local context that makes an option no longer viable, it should be mentioned. If the change sponsor has rejected feedback, they should explain why.
- **A fair and consistent application of its methodology:** If a sponsor decides to take an option forward, they should explain why and apply this adoption criteria consistently. Equally, if a sponsor has rejected an option, they should explain why and apply this exclusion criteria consistently.



# Step 2A – Conduct the DPE (2)

## Developing evaluation criteria

Change sponsors are required to develop a clear list of criteria for each of the design principles that will be applied to each option. This criteria is used to refine the comprehensive list of options into a shortlist. The criteria should be objective, specific, and measurable (scaled to show how an option has met, not met, or partially met the design principles).

For illustrative purposes, a worked example of how the high-level criteria can be developed for each design principle is provided in the table below. These are then used to demonstrate how the design options meet/not meet/partially meet the design principle:

Design Principle	Not Met	Partial	Met
<b>DP1 Safety</b> <b>High level Criteria:</b> Must maintain and, where possible, improve safety standards.	It is not safe and does not provide any improvements to the current standards.	It presents safety issues that will require additional work to be addressed.	It is safe and provides the basis to enhance current standards.
<b>DP2 Airspace Modernisation Strategy</b> <b>High Level Criteria:</b> Must be aligned with the strategic objectives of the latest Airspace Modernisation Strategy (AMS) (CAP1711).	It does not support the improvements and changes outlined in the AMS.	It needs additional work to be fully in line with AMS and its plans.	Meets one or more strategic objectives of the AMS; supports or delivers improvements and changes outlined in the AMS.



# Step 2B – Conduct the IOA

## What is the Initial Options Appraisal?

The IOA provides, as a minimum, a qualitative assessment which sets out how the change sponsor has moved from the SoN to the shortlist of options.

**What should be contained within the IOA? As a minimum,** the IOA must include the following information:

- **Comprehensive list of ‘viable’ options** - This list must include a description of the current-day scenario and the baseline that the sponsor has adopted to assess the options. Each option must be fully described and include an indicator of the likely noise impacts, as well as a high-level assessment of the costs and benefits involved. A non-exhaustive list of the potential impacts to be considered is provided in Table E2 of Appendix E, CAP1616.
- **Shortlist of options** - This list must provide a qualitative description of each shortlisted option and an indication of the preferred option(s).
- **Preferred option(s)** - These are the option(s) that perform better than the alternatives, when compared to the baseline. They will deliver higher benefits and lower costs based on the information available at that precise moment and will routinely be based on those options which result in fewer total adverse effects on stakeholders (both aviation and non-aviation). For illustrative purposes, a summary containing a colour coded matrix using red for rejected, amber for possible, and green for the initially preferred option choices may be used.



# Broader Stage 2 Requirements

## **What environmental assessments are required?**

The change sponsor must present an environmental assessment and options appraisal that addresses all relevant impacts for the scale of the airspace change, unless the change sponsor believes that it is not proportionate to conduct an environmental assessment of a specific metric. In this case, the change sponsor must present a rationale with supporting evidence to justify why they believe that to be so. To provide confidence in the assessment, the change sponsor must explain the assessment methodology adopted along with any assumptions made and present all supporting data.

## **Consideration of longer-term impacts**

Environmental assessments are required to look at the likely impacts for the opening year and typically out to +10 years. Therefore, a relevant traffic forecast covering the assessment period is required for all sponsors, including military sponsors, although military sponsors need only consider impacts on civil airspace users. This forecast should be factored into all environmental assessments to provide an understanding about how impacts might change. If the proposed airspace change is expected to have an effect on the number and/or the types of aircraft utilising the airspace then two sets of traffic forecasts must be provided, one assuming the airspace change proposal is not implemented and one assuming it is implemented. Traffic data for the baseline can be collected from various sources such as radar, ADS-B, FLARM, BGA Ladder, Network Manager, ANSPs, airports, field observations, stakeholder surveys, etc

## **Evidence gaps**

Whilst as a minimum a qualitative assessment is required, the change sponsor must still present how it plans to collect and fill in its evidence gaps to develop a more detailed assessment in the next stage.



# Broader Stage 2 Requirements (2)

## How do I approach the CAP 2091 minimum standards for noise modelling requirement?

The change sponsor must confirm and justify [the CAP2091](#) noise modelling category that they have used for the IOA and will adopt for the remainder of the airspace change process. In all cases, the change sponsor must provide supporting evidence that they can model to the confirmed category, for example in the form of noise contour outputs derived using the confirmed category. The category is determined by highest number of people impacted by the daytime and night-time lowest observed adverse effect level (LOAEL) in any one year over the entire forecast period. Therefore, the evidence presented at Stage 2 should take account of the baseline year, opening year and every intermediate year out to +10 years. If the change sponsor has no current noise model, they can use the least onerous methodology (i.e., Category E) to screen for the required category. The change sponsor may also volunteer a higher category than the minimum requirement. If the sponsor believes that noise modelling will result in no difference in the outputs for noise metrics and therefore proposes to scope out noise modelling, then the sponsor must present a rationale with supporting evidence to justify this.

## How do I present the supporting data?

The CAA expects to see referenced sources of data for all inputs and assumptions made in the impact assessment (CAP1616 paragraphs [B11](#) and [E11](#)). When modelling has been carried out, the change sponsor is also required to provide all supporting data in a machine readable format (e.g. .xlsx, .csv, .aero.) to enable the CAA to validate the analysis ([CAP1616 paragraph E56](#)). All assessments must use the most up-to-date and credible, clearly referenced sources of data with modelling carried out in line with relevant best practice.

**Additional references:** CAP1616a ([CAP1616a](#)), CAP1498 ([CAP1498](#))



# Broader Stage 2 Requirements (3)

## Which stakeholders need to be engaged?

The same stakeholders that were engaged to support the development of the design principles should be approached from Stage 1. There may be occasions where additional stakeholders identify themselves and approach the change sponsor directly. The change sponsor should consider the most appropriate stage for that feedback to be considered. If there is information that may inform the development/rejection of the options (e.g., methodology), then the sponsor may elect to engage with those stakeholders during Stage 2. Alternatively, it may be more appropriate for engagement to take place during the Stage 3 consultation (e.g., discussion on the merits of the options).

## How does a sponsor demonstrate how the DPE and IOA are influenced by engagement?

At the Develop and Assess Gateway, the CAA must see what change sponsors have been told by their stakeholders, how they responded to this feedback and how it has influenced the design options. The CAA will look for evidence that the change sponsor has captured and taken into account the views of stakeholders and that they have set out how decisions they have taken relate to stakeholder feedback. The change sponsor should summarise what was said and how it considered the feedback within the DPE and/or the IOA. If feedback has been rejected, there should be an explanation why. The change sponsor must explain which stakeholders were targeted, the engagement approach/methodology used (and the rationale for this). Related supporting evidence (outgoing/incoming correspondence, engagement materials, meeting minutes, summaries of calls agreed with stakeholders) should also be supplied.

