

# CAP 1616 Review: Consultation Response Document

CAP 2567

A large, abstract graphic composed of overlapping blue and purple shapes, primarily a large blue trapezoid with a curved bottom edge, and a darker purple shape at the bottom right corner.

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# Revision history

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This is the first edition, published September 2023

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# Foreword

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CAP 1616 was introduced in 2018, following a comprehensive independent review of the previous Airspace Change Process<sup>1</sup>. Conscious of the new requirements introduced through CAP 1616, the CAA committed to undertake a review three years after its implementation.

The review gives us the opportunity to reflect on the lessons learned since the introduction of CAP 1616 and make further improvements to the Airspace Change Process.

This report summarises the feedback received to the formal consultation we commenced on 5 January 2023, and our response to it. We have considered the consultation responses to decide which of the options presented in our consultation will be progressed. Where options are still under consideration, we have made that clear in this report. Where we have discounted options at this stage, we have explained why. You will learn about how our stakeholders responded to us and the work we have completed to date by reading this report.

We will be publishing a revised version of CAP 1616. While publication will be widely promoted, all stakeholders can keep up to date with further developments by monitoring the dedicated review webpage. We will work with our Change Sponsors to help them understand what the changes mean for their Airspace Change Proposal.

I wish to thank all stakeholders who have taken the time to contribute to the review and to all those who responded to the consultation. Your participation and feedback to date has been highly valuable and will continue to be considered in this final phase of the review.

Ben Lippitt

Manager Airspace Regulation

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<sup>1</sup> [CAP 725: Airspace Change Process Guidance Document \(caa.co.uk\)](https://www.caa.co.uk/CAP-725-Airspace-Change-Process-Guidance-Document)

# Executive summary

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## Overview

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Changes to the design of UK airspace can be proposed by an airspace Change Sponsor. The CAA requires the Change Sponsor of any change to the published airspace design to follow the CAP 1616 Airspace Change Process<sup>2</sup>. CAP 1616 was first introduced in January 2018 and a commitment was made to review it three years after its implementation.

This report summarises the conduct of a consultation to support the review and outlines our conclusions and next steps.

## Scope and objective

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The scope of this review is focussed on the regulatory process for Permanent and Temporary Airspace Change Proposals, as well as Airspace Trials.

In line with our regulatory principles, our objective is to produce an updated version of CAP 1616 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 propose and/or are affected by airspace changes.

This will be achieved by reflecting on lessons learned since the introduction of CAP 1616, where modifications will be informed by feedback received to our engagement activities, responses to our consultation, our own experiences of the Airspace Change Process, and emergent policy requirements.

We have engaged and consulted proactively and transparently with stakeholders during this review, reflecting and acting on their combined insight to support the development of a more proportionate regulatory Airspace Change Process.

## Stakeholder consultation

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We identified several key themes from our analysis of the feedback received from the stakeholder engagement activities conducted during our review. Consultation options were formed based on these key themes. Stakeholders were asked to respond to these

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<sup>2</sup> [CAP 1616: 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 \(caa.co.uk\)](#)

options during a consultation that ran for 10 weeks and three days. We have reviewed and analysed the consultation responses and set out our findings in this report.

## Consultation feedback high-level headlines

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The following is a list of high-level headlines of consultation feedback received. We provide detailed analysis of quantitative and qualitative feedback within Chapter 3.

### Structure of CAP 1616

- Stakeholders agreed that CAP 1616 needs to be simplified, the document's complexity reduced, and user experience improved.
- Requests were made for clearer signposting, provision of checklists, case study examples and placement of flowcharts at the start of each stage.

### Scaling Levels: Proportionate Scaling of Assessment

#### Scaling

- In general Change Sponsors wished to see a more proportionate approach to scaling.
- 57% of Change Sponsors agreed with the option to modify the scaling levels. Conversely 58% of residents affected by aviation disagreed with this option.
- Members of the General Aviation community (56%) and residents affected by aviation (50%) had the highest proportion of those who disagreed with extending the definition of Level 0.
- Some respondents who supported extending the definition of Level 0 sought clearer guidance based upon the relevant impact of the change to lessen the complexity of the Airspace Change Process.
- Concerns were raised about how the new levels would apply to military related Airspace Change Proposals and how the existing "M" levels would fit in.

#### Baseline

- 77% of respondents agreed with the statement that the baseline should be fully described at Stage 1. References were made to the potential for saving both time and cost thereby making the Airspace Change Process more effective.
- Some Change Sponsors, including new entrants, sought flexibility for their operations saying that defining the baseline at Stage 1 should be optional.
- Community groups, local government organisations and General Aviation respondents felt that defining the baseline earlier would increase the transparency of the Airspace Change Process.
- Suggestions were made that the Statement of Need should be better utilised to define the baseline.



## Stages, Steps and Gateways

### Design Principles, Stage 1 and 2 outputs and Checklists

- 64% of respondents agreed with the option to include mandatory and discretionary Design Principles within CAP 1616.
- The view was expressed that local stakeholders should still be able to influence the choice of Design Principles.
- 52% of respondents either disagreed or were unsure about a proposed requirement to test the Design Principles at each stage of the Options Appraisal process (Initial, Full and Final).
- Some community stakeholders disagreed with the proposal to remove some Stage 1 and Stage 2 outputs as this could lead to ill thought out Airspace Change Proposals and decreased scrutiny at crucial formative points in Airspace Change Process.
- 49% of respondents agreed and 12% of respondents were unsure in relation to the proposal to remove the requirement to develop a “comprehensive list” of Design Options (including “radical options”). Some Change Sponsor-related stakeholders saw this requirement as costly in situations where they knew some options would not progress further.
- 74% of respondents disagreed with the proposal to remove the requirement for stakeholder engagement on Design Options in Stage 2. Airports saw the value in retaining it but sought clarity on engagement requirements.
- Support was expressed for the provision of checklists for Change Sponsors, saying this would provide transparency and clarity and increase the effectiveness of the Airspace Change Process. There was a wish, however, for this not to cause any additional workload.

### Modification of Stages, Steps and Gateways

- A national representative organisation stated that transparency, engagement, and accountability must be maintained whichever modification options are progressed.
- The option that received the highest proportion of disagreement from stakeholders was doing nothing to the stages, steps, and gateways with 63% disagreeing.
- Just 6% of respondents agreed with the option of moving Step 1B (Design Principles) into Stage 2 (Design Options) with a single gateway assessment meeting at the end of Stage 2. Change Sponsors saw the removal of a Stage 1 gateway as introducing the potential for much wasted effort and resource.
- 44% of respondents agreed with the proposal to consolidate the Options Appraisals requirements for certain Airspace Change Proposals, 30% disagreed and 26% were unsure. Some Change Sponsors who were in support stated it would provide simplification, increase efficacy of Airspace Change Process, and alleviate resource requirements. Concerns were raised by others that this may lead to less engagement opportunities.

- Key themes from the feedback on content or placement of flowcharts included complexity (layout), Airspace Change Process effectiveness and clarification in terms of quality.

### **Engagement, Consultation and Communications**

- 71% of respondents felt that the CAA should provide a dedicated point of contact for Airspace Change Proposal related enquiries.
- Mixed feedback was received regarding the ICCAN toolkit with some stakeholders wishing to see it retained in its entirety and others making suggestions as to elements that could be retained.
- 44% of respondents considered that the guidance on categorisation of consultation responses currently outlined at Appendix C, Table C2 should be retained, whilst 29% of respondents were unsure.
- The view that the requirement for an accepted standard of 12 weeks for consultation should not be removed was expressed by 52% of respondents. Some suggested that up to 16 weeks might be required for major Airspace Change Proposals. Others focussed on opportunities to apply a scaled approach to length.
- 73% of respondents disagreed with transferring the responsibility for moderating and publishing consultation responses to Change Sponsors. Key themes that emerged related to trust, transparency, and impartiality.
- Suggestions were received for making better use of the Airspace Change Portal and the CAA website for related guidance.

### **Clarity**

- 80% of respondents felt that the provision of templates for use by Change Sponsors for the baseline data collection, environmental assessments and Options Appraisal would be helpful.
- 57% of respondents agreed with the proposal that assessment requirements for new entrants (Space Operators/UAS) should be clearly stated.
- Adding a requirement to analyse “other costs” for airports/air navigation service providers was supported by 43% of respondents with 41% unsure about this proposal.
- There was a positive response overall regarding the suitability of guidance meetings at key points in the Airspace Change Process.
- Respondents considered the proposed provision of an airspace change scope flowchart would be beneficial and add clarity to the current guidance.

### **Instrument Flight Procedures**

- Stakeholders responded similarly to the options for clarifying Instrument Flight Procedure design requirements/expectations. 37% of respondents agreed with the option to provide flexibility with the development of Instrument Flight Procedures to undertake the flyability assessment earlier in the Airspace Change Process, whilst 42% of respondents agreed with the option to develop and present an Instrument

Flight Procedure concept. 33% of respondents agreed with the option to provide a mix between those two options. Respondents also disagreed and were unsure about these three options in similar percentages.

- Minimal mention of Instrument Flight Procedures in CAP 1616 was referenced and requests were made to discuss Instrument Flight Procedure considerations with the CAA in detail.

### **Temporary Airspace Change Proposals and Airspace Trials**

- Change Sponsors generally supported the proposal to remove the references to consultation from the Temporary Airspace Change Process. Community representatives and residents affected by aviation felt that any Airspace Change Proposal that could impact communities should be consulted on, whether Temporary or Permanent.
- 46% of respondents agreed with the proposal to use 65 dB LAmax footprints within the Temporary Airspace Change Process, thereby replicating the requirements of the Airspace Trials process on to the Temporary Airspace Change Process. Only 12% of respondents disagreed with this proposal, whilst 42% were unsure.
- Support was expressed for broadening noise assessments for Temporary Airspace Change Proposals and Airspace Trials where a Permanent Airspace Change Proposal is likely to follow.

### **Feedback on options rejected prior to consultation**

- Some respondents expressed dissatisfaction with the rejection of a high-level proposal to require Change Sponsors of Temporary Airspace Change Proposals and Airspace Trials to engage with community stakeholders. It was also suggested that full consultation should be required before an Airspace Trial is permitted.
- While some stakeholders welcomed the decision not to introduce an abridged Airspace Change Process for Change Sponsors wishing to pursue a permanent arrangement beyond Temporary Airspace Change Proposals and Airspace Trials, others asked for the decision to be revisited and some form of reduced Airspace Change Process considered.

### **Alternative/Additional Options and other feedback**

- There was a call for independent technical advice to be made available to community stakeholders.
- Some respondents wish to see a CAA/Department for Transport (DfT) led education training course on consultation and engagement and requested further guidance on engagement considerations in the Airspace Change Process.
- Some stakeholders emphasised that CAA resource is pivotal to the effectiveness of the Airspace Change Process.
- Improved practical guidance was sought on the process for pausing, restarting, and withdrawing Airspace Change Proposals.

- Some Change Sponsors requested that assessment criterion are detailed for transparency.
- Community stakeholders and local authorities alike wanted to see options for improved environmental metrics to measure the impact of aircraft noise on communities.
- The importance of having a definition for tranquillity was stressed and clearer guidance requested relating to tranquillity requirements. More guidance was sought in general with regards to environmental requirements.
- Consultees representing Change Sponsors were keen to avoid restarting or repeating a part of the Airspace Change Process if they are midway through a gateway when new guidance is issued.

## Summary of key actions being taken

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Taking into account stakeholder feedback, we will be progressing a package of changes that will focus on providing simplification, clarification and proportionality. The package of improvements involves multiple strands and some of these will take longer to develop and deliver. While our priority will be to develop and publish a new suite of CAP 1616 documents, we will also do more to educate and inform stakeholders about the requirements of the CAP 1616 Airspace Change Process.

The following list is a summary of the key actions from the consultation. Explanation and rationale for all actions we are taking are detailed in Chapter 3.

### Structure of CAP 1616

- We will simplify the structure of CAP 1616 by separating the regulatory requirements of the Airspace Change Process from the related guidance. The main document will focus on the Airspace Change Process and a supporting suite of Guidance Documents will be produced.
- The content of CAP 1616 will focus specifically on detailing the regulatory requirements for Permanent and Temporary Airspace Change Proposals and Airspace Trials.
- CAP 1616 will be made more user friendly with improved access, clarity, and ability to navigate between the regulatory requirements and the related guidance in separate documents.

### Scaling and Baseline

- We will modify the scaling levels to Levels 1, 2 and 3 with revised definitions and we will explain how each of the Airspace Change Process requirements are scaled accordingly.
- References to M1 and M2 that currently apply to Airspace Change Proposals sponsored by the Ministry of Defence will be removed.
- Change Sponsors will be required to fully describe the baseline at Stage 1 (Define) and share the baseline at this stage with stakeholders.

## Stages, Steps and Gateways

- A core set of mandatory Design Principles on safety, policy and the environment will be applied to Levels 1, 2 and 3. The revised CAP 1616 will include discretionary Design Principles. Change Sponsors will have the opportunity to select the discretionary Design Principles and develop bespoke Design Principles which they think are relevant in the context of their proposal.
- We will not be changing the current requirements to test Design Principles. In Stage 2, Change Sponsors will still be required to evaluate the Design Options against the Design Principles in a fair and consistent manner through the Design Principle Evaluation. We will not be extending this requirement so that Change Sponsors need to re-do their Design Principle Evaluation in Stages 3 and 4. However, the Design Principles will continue to influence the CAA's assessment of the Change Sponsor's Initial Options Appraisal (Stage 2) and Full Options Appraisal (Stage 3), as well as being part of the information available to us when we make our decision (Stage 5).
- We will remove the requirement to produce a "comprehensive list" of options to enable greater focus on developing realistic and viable Design Options that address the Statement of Need and align with the Design Principles.
- Existing requirements for the development of Design Principles will be retained, Stage 2 engagement requirements will remain, and we will clarify these within the updated CAP1616 document.
- It will be mandatory for Change Sponsors to complete a checklist and include it within their submission at each stage of the Airspace Change Process.
- We will remove the references to steps currently set out within the stages of CAP 1616.
- The CAA will retain the requirement to collate and review responses within Stage 3 as we recognise the preference from both Change Sponsors and other stakeholders to keep this requirement in the same place within Airspace Change Process. Change Sponsors will be required to publish the categorisation for each consultation response in a Consultation Response Document within Stage 3 of the Airspace Change Process.
- There will be consolidation of the Initial Options Appraisal and Full Options Appraisal requirements for Airspace Change Proposals where there is a single design option only (other than the "do nothing" baseline option). This will not change the requirements for Stage 2 engagement and Stage 3 consultation.
- CAP 1616 stage flowcharts will be located at the beginning of each stage. Separate flowcharts will be provided for Temporary Airspace Change Proposals and Airspace Trials. A scalability matrix will be provided detailing which requirements are mandatory or optional.

## **Engagement, Consultation and Communications**

- Training and information will be provided for Change Sponsors and other stakeholders outside the CAP 1616 Airspace Change Process to enhance their understanding of it.
- We will determine what parts of the ICCAN toolkit, if any, should be incorporated into CAP 1616 Guidance Documents.
- The current reference to 12 weeks being our “accepted standard” for airspace change consultations will not change.
- Responsibility for moderating and publishing consultation responses will be transferred to Change Sponsors.
- We will work with CAA colleagues to enhance the functionality of the Airspace Change Portal and to review and update the website.

## **Clarity**

- A requirement to analyse “other costs” for airports/air navigation service providers will be added.
- Guidance meetings and Change Sponsor-led briefings at the point of submission will be introduced. They will be optional for both the Change Sponsor and the CAA.
- Checklists, including the requirements for each gateway assessment, will be published for each stage.
- We will confirm whether an Airspace Change Proposal is required and whether a statement of need must be submitted within the updated CAP1616 document set.
- Stage 4 guidance will address the need for Change Sponsors to provide an explanation to the CAA why they consider a proposal to not be inconsistent with the Airspace Modernisation Strategy (AMS).

## **Instrument Flight Procedures**

- Consultation feedback on options for conducting the flyability assessment and presenting an Instrument Flight Procedure design concept earlier in the Airspace Change Process remains under consideration.
- Guidance will be provided regarding Instrument Flight Procedure criteria, compliance, and requirements. It will remain the case that final decisions on Instrument Flight Procedures will be taken at Stage 5.

## **Temporary Airspace Changes/Airspace Trials**

- We will remove references to “consultation” from the Temporary Airspace Change Proposals to align with the short-term nature of Temporary Airspace Change Proposals. The existing requirements for targeted engagement for Temporary Airspace Change Proposals will remain and will be discussed in detail at the assessment meeting.
- Where a Temporary Airspace Change Proposal leads to a Permanent Airspace Change Proposal, Change Sponsors will still be required to follow the full Permanent Airspace Change Process, including a consultation.

- The requirement to use 65dB LAmax footprints for day flights and 60dB LAmax for night flights will be introduced for Temporary Airspace Change Proposals.
- The new Guidance Document will provide details on the noise metrics required for Temporary Airspace Change Proposals and Airspace Trials.

### **Consideration of high-level proposals originally rejected**

- An abridged Airspace Change Process for Permanent Airspace Change Proposals that follow Temporary Airspace Change Proposals or Airspace Trials will not be introduced.
- We will not be providing specific guidance on how outputs from a temporary change or Airspace Trial could be used to scale requirements of the Permanent Airspace Change Process.
- An arbitration service will not be introduced.
- The Design Principles Evaluation process is being retained. We will continue to require Change Sponsors to use the standardised format for the design principle evaluation.
- We will not be requiring Change Sponsors of Temporary Airspace Change Proposals and Airspace Trials to engage with community stakeholders. Given the short-term nature of these changes, the current engagement requirements are proportionate.

### **Alternative/additional options and other feedback**

- We will not provide independent technical advice, however, a single point of contact for all enquiries and complaints concerning the use of UK airspace and the Airspace Change Process will be provided.
- We will explore the possibility of facilitating annual “show and tell” events to educate and inform stakeholders that have an interest in the Airspace Change Process and consider developing short educational videos related to the Airspace Change Process.
- We are increasing CAA resource and are continuing to consider the structure of the Airspace Regulation team.
- Guidance on the process for pausing, restarting, and withdrawing Airspace Change Proposals will be provided together with what Change Sponsors need to take into consideration when formulating their timeline.
- We will describe gateway outcomes, including the criteria for each outcome, within the guidance.
- Submission checklists and templates will be developed to assist Change Sponsors preparing their input.
- Improved guidance on environmental, tranquillity and biodiversity requirements will be provided within the updated document set.
- We will work with Change Sponsors to help them understand what the changes we are making to CAP 1616 mean for their Airspace Change Proposal, if any.

## Next steps

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Having completed the review and analysis of the consultation responses received, we have identified options that will be progressed and incorporated within a revised version of the Airspace Change Process. Some options are being considered further and we address those too.

We will produce and publish a revised version (V.5) of CAP 1616, and we will work with Change Sponsors to help them understand what the changes mean for their Airspace Change Proposal, if any. Notification of publication will be provided to our stakeholders via our dedicated review webpage and associated media/communication channels.



# 1. Background/Overview

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## 1.1 The Airspace Change Process

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- 1.1.1 Changes to the design of UK airspace can be proposed by an airspace Change Sponsor. Change Sponsors of airspace change could typically be an airport operator, air navigation service provider, an unmanned aircraft operator or a spaceport. The CAA requires the Change Sponsor of any change to the published airspace design to follow the CAP 1616 Airspace Change Process.<sup>3</sup> CAP 1616 was first introduced in January 2018 and a commitment was made to review it three years after its implementation.
- 1.1.2 This report summarises the responses we received to the consultation we conducted from 5 January 2023 to 19 March 2023 and our response to that feedback, together with next steps.

## 1.2 Who is this report for?

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- 1.2.1 This document is intended to be read by stakeholders with an interest in changes that impact airspace, including the following:
- **Change Sponsors of Airspace Change Proposal.**
  - **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 and airports,
  - **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**

## 1.3 Scope and objective

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- 1.3.1 The scope of this review is focussed on the regulatory process for Permanent and Temporary Airspace Change Proposals, as well as Airspace Trials.

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<sup>3</sup> [CAP 1616: 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 \(caa.co.uk\)](https://www.caa.co.uk/~/media/CAA/Images/Supporting%20Information/2018/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_caa.co.uk)

1.3.2 The consultation did not cover the following:

- The airspace change process for Planned and Permanent Redistribution (PPR) of air traffic proposals (Part 2 of CAP 1616)
- The airspace change process for temporary PPR proposals (Part 2a of CAP 1616)
- The requirement to provide airspace information and transparency related to airspace use and aircraft movements (Part 3 of CAP 1616)

## 1.4 The history of our CAP 1616 review to date

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1.4.1 We were keen to hear from stakeholders working directly with the CAP 1616 airspace change process as well as those that were affected by it and the review has received contributions from internal and external stakeholders.

1.4.2 In June 2021, three internal workshops on the airspace change process took place with subject matter experts from different areas of airspace regulation (i.e., technical, engagement and consultation, environment, economic and instrument flight procedure) and with account managers responsible for coordinating the CAA's oversight of individual Airspace Change Proposal. Between July and September 2021, we facilitated five workshops with external stakeholders. Forty external stakeholders took part in these workshops.

1.4.3 Key feedback themes from the internal and external workshops informed the content of an engagement survey. The survey was live on the Citizen Space engagement online platform for the whole of November 2021 (30 days). Responses were received from 170 stakeholders.

1.4.4 The output from the stakeholder engagement activities has driven the review and helped to focus it on pertinent points. The feedback we received from stakeholders during the engagement activities conducted in 2021 was analysed and we identified several key themes which formed the basis for the options we presented at consultation. You can read about the engagement activities we conducted and their output in our report of engagement activity.<sup>4</sup>

## 1.5 Why consult now?

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1.5.1 We made a commitment to review the CAP 1616 Airspace Change Process three years after its implementation.

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<sup>4</sup> Review of the CAP 1616 Airspace Change Process: Report of Engagement Activity: June to November 2021  
[Review of the CAP 1616 Airspace Change Process: Report of Engagement Activity: June to November 2021 \(caa.co.uk\)](#)

- 1.5.2 While the COVID-19 pandemic impacted the numbers of Airspace Change Proposals that we could use as a benchmark for this review, we were still able to learn from our own experiences of working on these proposals, as well as stakeholders' experiences of the Airspace Change Process to date.

## 1.6 Chronology of consultation

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- 1.6.1 Our formal consultation commenced on 5 January 2023. The consultation document was made available via the CAA's Citizen Space consultation hub together with an online feedback form. On 9 February 2023, a webinar for external stakeholders took place.
- 1.6.2 The original publicised consultation closure date was 5 March 2023. We received one request for the consultation to be extended. We agreed to the request and notified all stakeholders that the consultation would close on 19 March 2023.

## 1.7 How the report is structured.

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- 1.7.1 This report explains what we did (our methodology and approach), what was said (consultation feedback) and our response at this stage. How we consulted (what we did) is detailed in Chapter 2 and our analysis of the consultation responses is presented in Chapter 3, alongside our response to it. The action (next steps) we propose to take are set out in Chapter 4.

## 1.8 Who authored this report.

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- 1.8.1 This report was completed by the CAA's Airspace Regulation team. Airspace Regulation is responsible for the regulatory oversight of the CAP 1616 Airspace Change Process

## 2. How we consulted (what we did)

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### 2.1 Introduction

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2.1.1 We conducted our consultation virtually via the CAA's Citizen Space consultation hub<sup>5</sup> which provided respondents with an opportunity to complete an online consultation response form to tell us their views. A webinar was conducted five weeks after the consultation commenced to assist stakeholders with preparing their responses. Detail on our consultation approach is contained within this chapter.

### 2.2 Consultation audience

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2.2.1 Our consultation stakeholder audience comprised targeted stakeholders, which included all those that participated in engagement activities in the early stages of the review, and all other stakeholders who may have an interest in changes that impact airspace.

2.2.2 Our stakeholder groups included the following:

- **Change Sponsors of** Airspace Change Proposals.
- **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.**

2.2.3 Communications and social media activities were used to publicise the consultation for all other stakeholders who may have an interest in the review. Members of the public were able to read our proposals and participate in the consultation through the CAA's Citizen Space consultation hub.

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<sup>5</sup> <https://consultations.caa.co.uk/safety-and-airspace-regulation-group/acp2022>

## 2.3 Consultation approach

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- 2.3.1 The consultation was conducted via the CAA's Citizen Space consultation hub. Stakeholders were able to read our consultation document via this platform and access an online consultation response form.
- 2.3.2 To assist stakeholders prepare their consultation responses, the CAA held a webinar on 9 February 2023. The webinar was run by members of the CAA's Airspace Regulation Team and the Communications Team using the zoom virtual platform. The webinar was promoted via our communications and social media channels. One hundred and fifty-seven stakeholders registered for the webinar.
- 2.3.3 The webinar was attended by 108 stakeholders. The webinar presentation included information on the background and context for the CAP 1616 review, engagement work completed to support the review, key themes of the consultation, development of proposals and options together with the anticipated next steps after the close of the consultation. During the webinar, stakeholders were able to post questions using the chat function. Questions were responded to by the CAA both via the chat function and verbally.
- 2.3.4 A video of the webinar was added to the CAA's Citizen Space consultation hub for stakeholders to view. The video was promoted via our communications and social media channels.

## 2.4 Consultation materials

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- 2.4.1 Our consultation materials comprised a consultation document providing details of the options on which feedback was sought. Background information about the consultation and a glossary of airspace terms were included together with a link to the current CAP 1616 Airspace Change Process.
- 2.4.2 Stakeholders were invited to complete an online consultation survey. The questions asked can be viewed at Appendix D.

## 2.5 Consultation options

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- 2.5.1 Several key themes emerged from the feedback we received from stakeholders during our engagement activities. These were:
- **Structure** - CAP 1616 is a large publication, and this theme relates to the order and navigation of the document and its annexes.
  - **Scaling Levels: Proportionate Scaling of Assessment** - There are opportunities within CAP 1616 to develop a more proportionate

Airspace Change Process. This theme explores how we could do this and under what circumstances.

- **Stages / Steps / Gateways** – This theme considers options to review the number of stages, steps and gateways and their purpose, and considers ways in which the Airspace Change Process could be simplified and made easier to follow and understand.
- **Engagement, Consultation and Communications** - This theme looks at how all stakeholders (including us) involved in the Airspace Change Process can have better, more informed, meaningful conversations.
- **Clarity** - This refers to how clear and comprehensive our stakeholders find the CAP 1616 Airspace Change Process and how improvements can be made.
- **Instrument Flight Procedures (IFP)** - This theme looks at opportunities to add Instrument Flight Procedure references to all stages of the Airspace Change Process to provide clarity regarding how the development of Instrument Flight Procedure design impacts the Airspace Change Process.
- **Temporary Airspace Change Proposals** - This theme explores how the Airspace Change Process for Temporary Airspace Change Proposals is working and how we can improve engagement on them; as well as understanding the needs of new entrants to airspace.

2.5.2 When considering each theme, we initially developed “high-level proposals” before developing specific options to address them. The options were presented in our consultation document. Our analysis of the consultation responses to the options, grouped within these key themes, is presented in Chapter 3, together with our response.

2.5.3 Within the consultation document, we detailed the actions that we are committed to doing in response to each theme. We informed stakeholders that, even with those options we had chosen not to take forward at the time of consultation, we would continue to listen and gather feedback on them. Our analysis of consultation responses regarding these actions is also presented in Chapter 3, together with our response.

2.5.4 While analysing the consultation responses, we identified some suggestions. Our response to these suggestions is presented in Chapter 3.

## 2.6 Consultation length

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2.6.1 Our consultation was launched on 5 January 2023 with a publicised closure date of 5 March 2023. We were asked to extend the duration of the consultation to

allow more time for response. We extended the consultation by a period of two weeks so that the consultation closed on 19 March 2023.

2.6.2 We updated the consultation document and Citizen Space platform to reflect the revised consultation closure date, and we notified stakeholders via email and our social media channels.

2.6.3 The overall consultation length was 10 weeks and three days. The consultation was not conducted during any major holiday seasons. A good response rate was achieved with 106 responses received. We consider that the time allowed for stakeholders to consider the consultation material and provide their responses was proportionate, sufficient, and reasonable.

## 2.7 Communications

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2.7.1 Communications were developed to promote the consultation and encourage participation:

- **Emails:** An initial email was distributed to 1,348 organisations and individuals that we know have an interest in airspace change. This included representatives from airports, airlines, air navigation service providers, community groups, General Aviation, and environmental groups. We also issued an invitation to attend our webinar event. Two reminder notifications were distributed at the midpoint of the consultation.
- We encouraged colleagues across the CAA to publicise the consultation in their communications with external stakeholders.
- **Webinar:** A webinar was held on 9 February 2023 for stakeholders to attend to help them prepare their responses to the consultation. The event was recorded and made available for stakeholders to watch on our consultation hub. A link to the webinar was also included in our email reminder notifications.
- **Skywise:** Skywise is the CAA's news bulletin. The bulletin contains up-to-date information about safety alerts, consultations, rule changes and more. All 9,162 subscribers signed up to "airspace change" at the time were sent information about the launch of the consultation through this bulletin.
- **Social media:** The consultation and webinar were promoted on both the CAA's Twitter and LinkedIn channels. At launch, we posted a video with the CAA's Head of Airspace, Air Traffic Management and Aerodromes. A short explainer video was included as part of a reminder notification. Posts were also published to notify stakeholders of the extension to the consultation length.

- **Press release:** A related press release was published to support the launch of the consultation.
- **Web pages:** A dedicated webpage<sup>6</sup> was updated for stakeholders to keep abreast of all activities related to the review.
- **Business as usual meetings:** During meetings held while the consultation was ongoing, opportunities were taken to prompt stakeholders to access the consultation hub and submit responses.

## 2.8 Accessibility and alternative formats

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- 2.8.1 Stakeholders were informed that paper copies of the consultation document could be requested. No requests were received.
- 2.8.2 We told stakeholders that postal responses to the consultation would be accepted. One postal response was received, scanned, and uploaded to the CAA's Citizen Space consultation hub for analysis.
- 2.8.3 In the consultation document we stated that requests for the document in another format could be submitted by email or by post. The following requests were accommodated:
- Two requests for provision in pdf format
  - Two requests for provision in word format
- 2.8.4 One stakeholder requested a summary matrix of the proposals. We decided it was not possible to compile a summary document that provided an appropriate level of context to enable an informed consultation response.

## 2.9 Moderation and publication of responses

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- 2.9.1 Consultation responses were moderated by the CAA to remove any unsuitable content, but not as a general means of censoring or filtering responses. Where consent had been given to publish, responses were published on the CAA's Citizen Space consultation hub. Responses were moderated and published in batches during the consultation.

## 2.10 Enquiries and complaints during consultation

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- 2.10.1 The CAA received two requests to submit a consultation response outside of the online survey. These were responded to by email by members of the Airspace

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<sup>6</sup> [www.caa.co.uk/Review-of-CAP-1616](http://www.caa.co.uk/Review-of-CAP-1616)

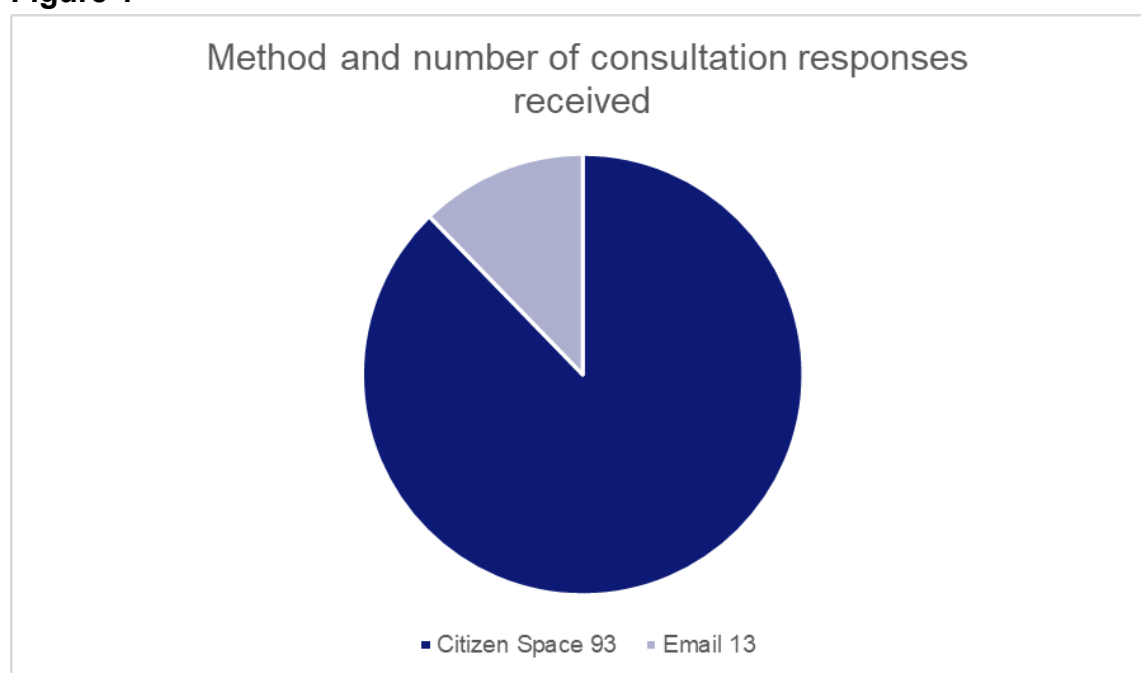


Regulation team as the consultation progressed. One response was removed from the CAA's Citizen Space consultation hub at the request of a stakeholder as they had accidentally submitted it before completion. This stakeholder subsequently submitted a consultation response online. One complaint was received and actioned during the consultation.

## 2.11 How consultation responses were received.

2.11.1 One hundred and six consultation responses were received. The chart in **Figure 1** below shows a breakdown of how the responses were received.

**Figure 1**



**Figure 1** - Method and number of consultation responses received.

Method of consultation responses received	Number
Citizen space	93
Email	13
<b>Grand Total</b>	<b>106</b>

*Table 1 - Method and number of consultation responses received.*

## 2.12 How we analysed the data

2.12.1 We analysed the “closed” questions in the survey numerically and have presented the quantitative data derived from this analysis in Chapter 3. We developed a coding framework to enable robust analysis of the qualitative data contained within the text of consultation responses. Codes were derived purely from the themes that emerged from the raw data responses. Quality assurance arrangements were implemented to ensure consistent allocation of themes across all qualitative data. Our analysis of the qualitative data is also presented in Chapter 3, together with our response.

## 3. Your feedback (you said/we heard) and our response (we did)

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### 3.1 Introduction

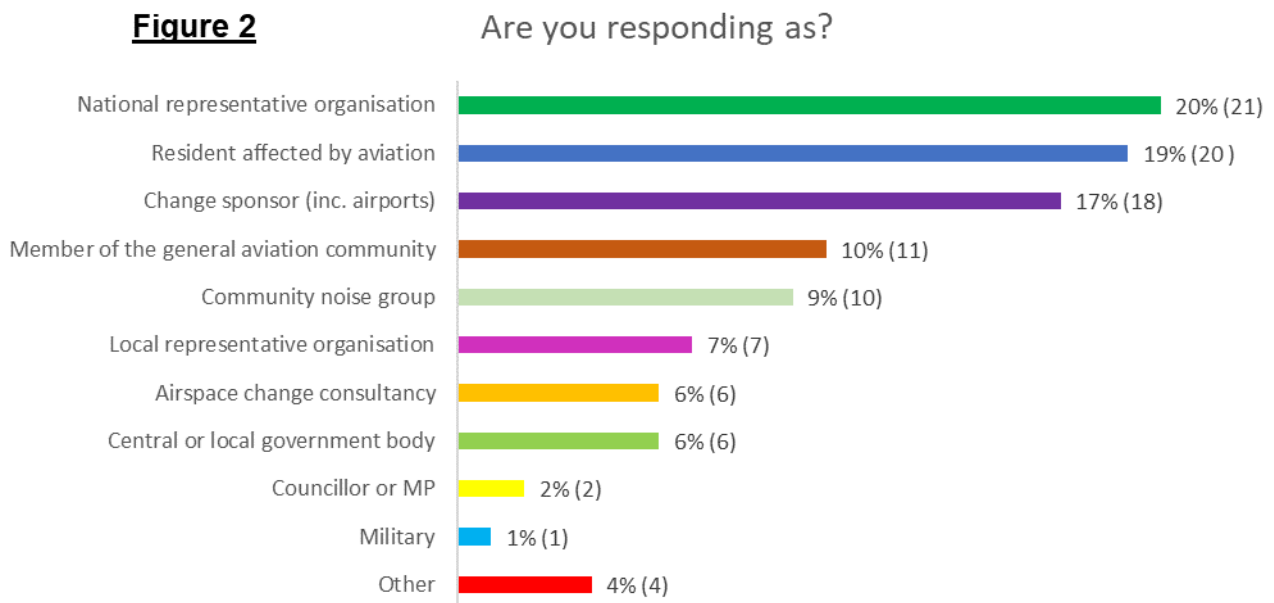
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- 3.1.1 Several key themes were discussed at consultation and specific options presented to stakeholders for their feedback. Our analysis of consultation responses is detailed in this Chapter and presented by theme in the order of the survey questions, together with our response. We have presented numerical data and analysis of the opinions and context expressed within the free text boxes contained within the consultation survey. Numerical data is expressed by both number and percentage.
- 3.1.2 We have included analysis of feedback on options we rejected prior to consultation and suggestions made by stakeholders for additional options for consideration by the CAA. Our response to new themes or suggestions that emerged from analysis of consultation feedback is also presented in this Chapter.
- 3.1.3 In considering the consultation feedback and our response to it, we have identified actions we can take to support stakeholders in their understanding of the new version of CAP 1616 when it is published. We have outlined our planned actions in this Chapter.

### 3.2 Who responded to the consultation

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- 3.2.1 Respondents were asked in what capacity they were completing the survey. Depending on how they responded, they were asked to elaborate. **Figure 2** below shows how people responded overall to this question.



**Figure 2 - Are you responding as?**

Are you responding as a: -	Number
<b>National representative organisation</b>	21
<b>Resident affected by aviation</b>	20
<b>Change Sponsor (inc. airports)</b>	18
<b>Member of the General Aviation (GA) community</b>	11
<b>Community noise group</b>	10
<b>Local representative organisation</b>	7
<b>Airspace change consultancy</b>	6
<b>Central or local government body</b>	6
<b>Councillor or MP</b>	2
<b>Military</b>	1
<b>Other</b>	4
<b>Grand Total</b>	106

**Table 2 - Are you responding as?**

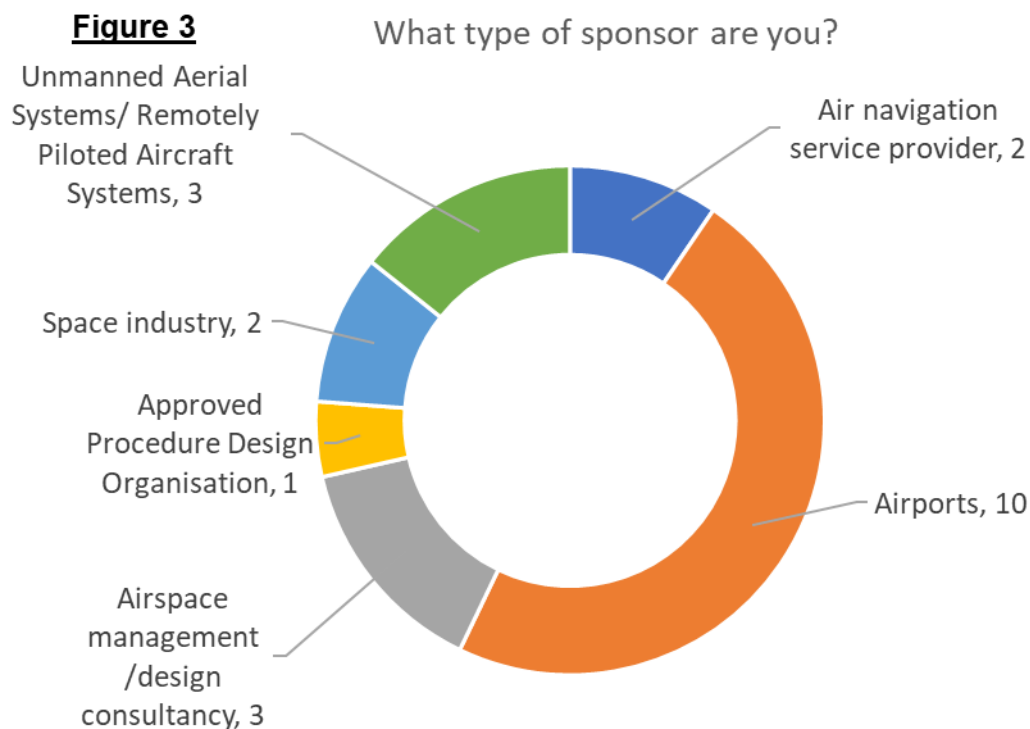
**Figure 2** above shows that national representative organisations represented a 20% (21 out of 106) of respondents, and residents affected by aviation represented 19% (20 out of 106) of respondents. Change Sponsors accounted for 18% (18 out of 106) of respondents while airspace change consultancies represented 6% (6 out of 106). One out of ten (10%) respondents identified as members of the General Aviation community while military representatives and politicians (councillors or MPs) accounted for just 1% and 2% of all respondents respectively.

For the quantitative analysis, stakeholders were grouped in the categories shown below in **Table 2A**.

Category used for analysis	Category from survey as shown above in Figure 2
Change Sponsor related	Airspace change consultancy, Change Sponsor (inc. airports)
Central/local political	Central or local government body, Councillor or MP
Community	Community noise group, local representative organisation
Member of the GA community	Member of the GA community
Military	Military
National representative organisation	National representative organisation
Resident affected by aviation	Resident affected by aviation
Other	Other

**Table 2A-** Stakeholder categories used for analysis.

We asked respondents who identified as a Change Sponsor what kind of Change Sponsor they were. The breakdown of Change Sponsor type is represented in the chart below (**Figure 3**). Of those Change Sponsors who responded to this question, almost half identified as airports. New entrants (space and remotely piloted aircraft systems) were also represented.



**Figure 3** - What type of sponsor are you?

Type of sponsor/consultancy	Number
Air navigation service provider	2
Airports	10
Airspace management/design consultancy	3
Approved Procedure Design Organisation	1
Space industry	2
Unmanned Aerial Systems (UAS)/ Remotely Piloted Aircraft Systems (RPAS)	3
<b>Total</b>	<b>21</b>

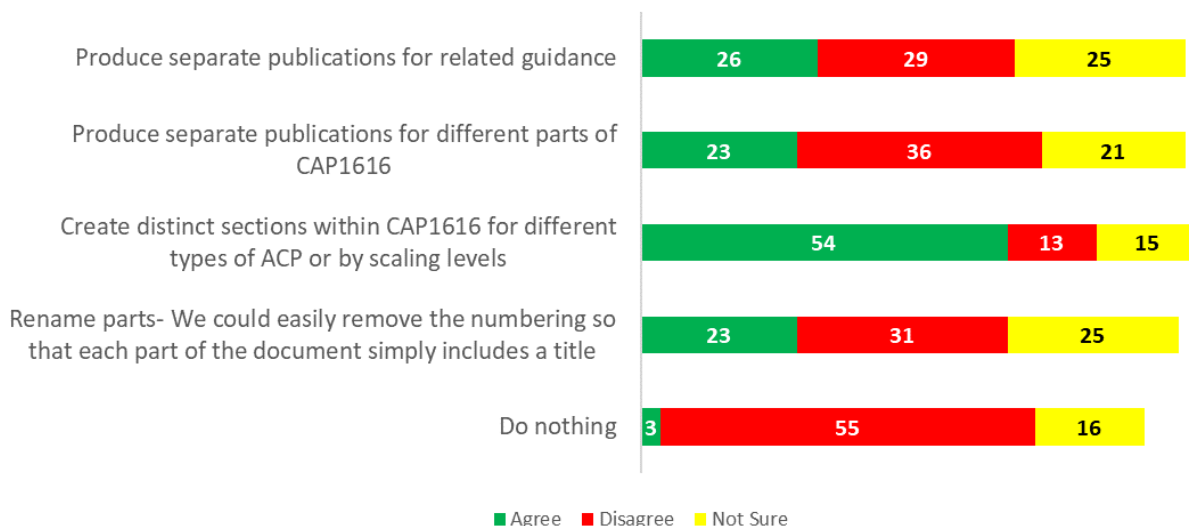
**Table 3** - Type of sponsor/consultancy

### 3.3 Structure of CAP 1616

3.3.1 For our first theme at consultation we presented a proposal regarding simplification of the structure of CAP 1616. In this section we summarise the results for survey questions 3 and 4 that relate to this theme.

**Figure 4**

Question 3 Options for simplifying the structure of CAP 1616



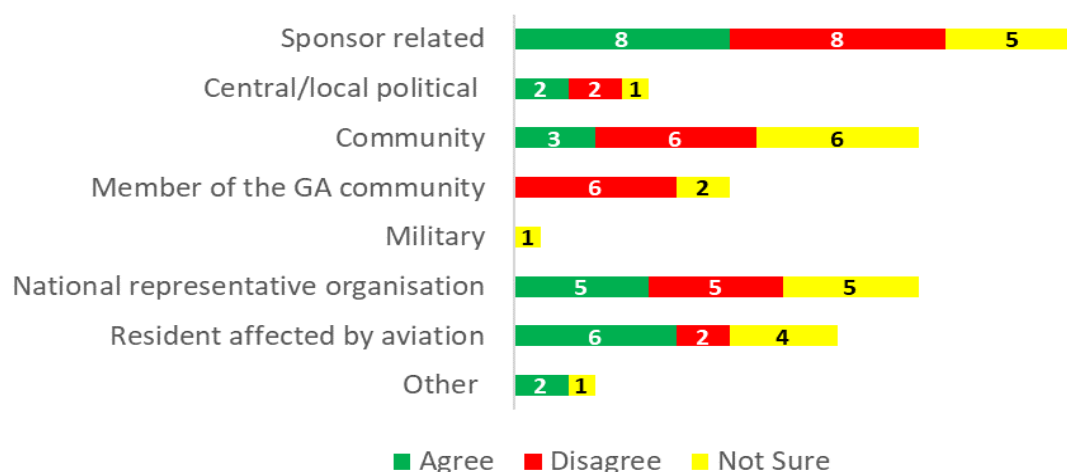
**Figure 4 - Question 3: Options for simplifying the structure of CAP1616**

Please indicate if you agree, disagree or are not sure about the options	Agree	Disagree	Not Sure	Grand Total
Produce separate publications for related guidance	26	29	25	80
Produce separate publications for different parts of CAP 1616	23	36	21	80
Create distinct sections within CAP 1616 for different types of Airspace Change Proposals or by scaling levels	54	13	15	82
Rename parts - We could easily remove the numbering so that each part of the document simply includes a title	23	31	25	79
Do nothing	3	55	16	74

**Table 4 - Question 3: Options for simplifying the structure of CAP 1616**

- 3.3.2 We sought feedback from stakeholders on the structure of the CAP 1616 Airspace Change Process. Respondents were presented with five different options suggesting how the structure of CAP 1616 could be simplified, and asked whether they agreed, disagreed or were not sure about them.
- 3.3.3 The chart above (**Figure 4**) shows that there was almost an even split between those who agreed, disagreed and were unsure about the option to “produce separate publications for related guidance” and the option to “rename parts of the document”. Approximately 66% (54 out of 82) respondents showed support for the option to “create distinct sections within CAP 1616 for different types of Airspace Change Proposal or by scaling levels”. More respondents disagreed (45%, 36 out of 80) than agreed (29%, 23 out of 80) with the option to produce separate publications for different parts of CAP 1616 while 74% (55 out of 74) of respondents disagreed with “doing nothing” in relation to the proposal to simplifying the document.
- 3.3.4 The charts in **Figures 5, 6, 7 and 8 and 9** below show how different types of stakeholders responded to the options above.
- 3.3.5 The chart below (**Figure 5**) shows the responses to Option 1 by stakeholder. There was an even split of 38% (8 out of 21) of Change Sponsors that were in favour or not in favour of the option to produce separate publications for the related guidance, while 24% (5 out of 21) were unsure. Similarly, there was an even split between the responses from national representative organisations on this option, with 5 responses in favour, not in favour and unsure. Residents affected by aviation had the highest proportion of respondents who felt the guidance should be presented in separate publications (50%, 6 out of 12). 40% (6 out of 15) of community representatives and 75% (6 out of 8) of the General Aviation respondents disagreed that related guidance should be presented in separate documents.

**Figure 5** 1. Produce separate publications for related guidance  
(respondent type by number for question 3)



**Figure 5** - Produce separate publications for related guidance (respondent type by number for question 3)

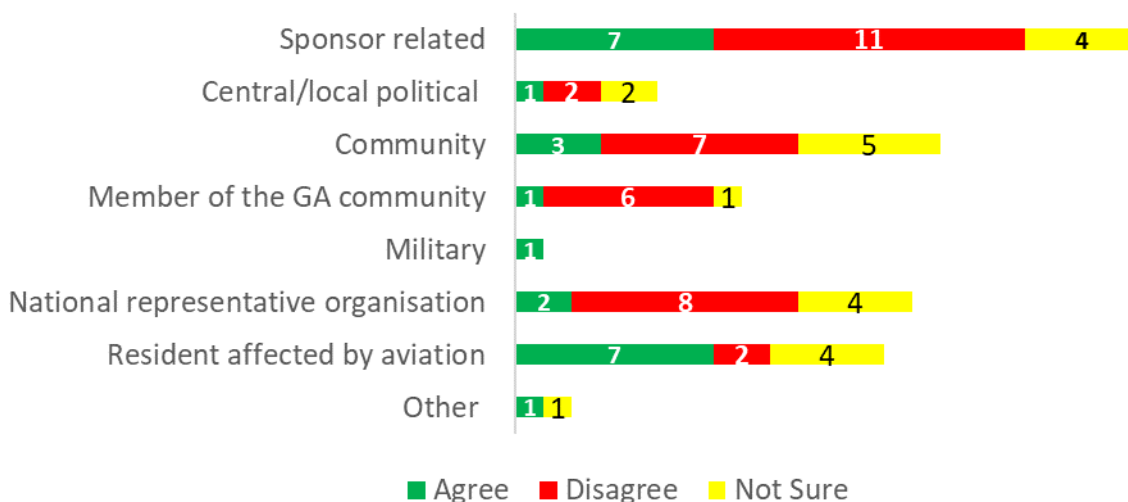
<b>Option 1: Produce separate publications(s) for related guidance</b>	<b>Agree</b>	<b>Disagree</b>	<b>Not Sure</b>	<b>Grand Total</b>
<b>Sponsor related</b>	8	8	5	21
<b>Central/local political</b>	2	2	1	5
<b>Community</b>	3	6	6	15
<b>Member of the GA community</b>	0	6	2	8
<b>Military</b>	0	0	1	1
<b>National representative organisation</b>	5	5	5	15
<b>Resident affected by aviation</b>	6	2	4	12
<b>Other</b>	2	0	1	3
<b>Grand Total</b>	26	29	25	80

**Table 5 - Question 3 Option 1: Produce separate publication(s) for related guidance.**

3.3.6 The chart below (**Figure 6**) shows the responses to Option 2 by stakeholder. The military respondent and 54% (7 out of 13) residents affected by aviation felt that separate publications for different parts of CAP 1616 should be produced. In contrast, 57% (8 out of 14) national representative organisations, 50% (11 out of 22) of Change Sponsors and 47% (7 out of 15) of community representatives disagreed with this option. Community representatives had the greater number of respondents who were unsure in relation to this option.



**Figure 6** Produce separate publications for different parts of CAP 1616  
(respondent type by number for question 3)



**Figure 6** - Produce separate publications for different parts of CAP1616 (respondent type by number for question 3)

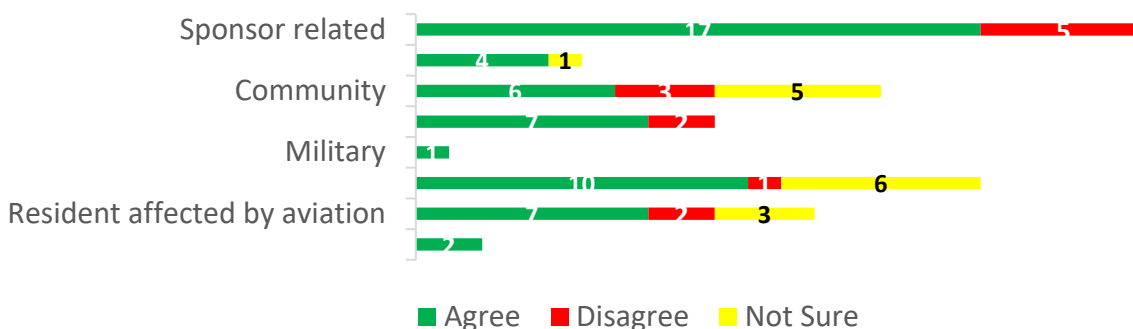
Option 2: Produce separate publications for different parts of CAP 1616	Agree	Disagree	Not Sure	Grand Total
Sponsor related	7	11	4	22
Central/local political	1	2	2	5
Community	3	7	5	15
Member of the GA community	1	6	1	8
Military	1	0	0	1
National representative organisation	2	8	4	14
Resident affected by aviation	7	2	4	13
Other	1	0	1	2
<b>Grand Total</b>	<b>23</b>	<b>36</b>	<b>21</b>	<b>80</b>

**Table 6** - Question 3 Option 2: Produce separate publications for different parts of CAP 1616.

3.3.7 The chart below (**Figure 7**) shows the responses to Option 3 by stakeholder. It shows that respondents supported the option to create distinct sections for different types of Airspace Change Proposal or by scaling levels, with 77% (17 out of 22) of Change Sponsors and 59% (10 out of 17) of national representative organisations having the greatest number of respondents in favour. Central/local political, military and those respondents who identified as 'other' did not disagree with this option. 35% (5 out of 14) of both community representatives and national representative organisations (35%, 6 out of 17) had the highest proportion of those who were unsure.

### **Figure 7**

3. Create distinct sections within CAP 1616 for different types of ACP or by scaling levels (respondent type by number for question 3)



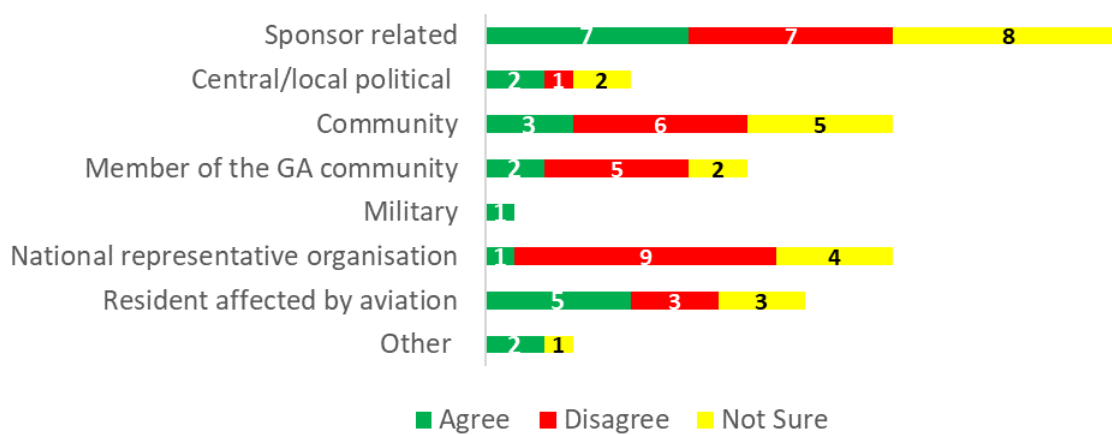
**Figure 7** - Create distinct sections within CAP1616 for different types of Airspace Change Proposal or by scaling levels (respondent type by number for question 3)

<b>Option 3: Create distinct sections within CAP 1616 for different types of Airspace Change Proposals or by scaling levels</b>	<b>Agree</b>	<b>Disagree</b>	<b>Not Sure</b>	<b>Grand Total</b>
<b>Sponsor related</b>	17	5	0	22
<b>Central/local political</b>	4	0	1	5
<b>Community</b>	6	3	5	14
<b>Member of the GA community</b>	7	2	0	9
<b>Military</b>	1	0	0	1
<b>National representative organisation</b>	10	1	6	17
<b>Resident affected by aviation</b>	7	2	3	12
<b>Other</b>	2	0	0	2
<b>Grand Total</b>	54	13	15	82

**Table 7** Question 3 Option 3: Create distinct sections within CAP 1616 for different types of Airspace Change Proposal or by scaling levels.

3.3.8 The chart below (**Figure 8**) shows the responses to Option 4 by stakeholder. It shows the percentage of respondents disagreeing with removing the numbering within the document, with 64% (9 out of 14) of national representative organisations having the highest proportion who disagreed, followed by 56% (5 out of 9) of the GA community. Change Sponsors had differing views. 32% (7 out of 22) agreed, another 32% (7 out of 22) disagreed and 36% (8 out of 22) were unsure.

**Figure 8** 4. Rename parts - Remove numbering so that each part of the document simply includes a title (respondent type by number for question 3)



**Figure 8** - Remove numbering so that each part of the document includes a title (respondent type by number for question 3)

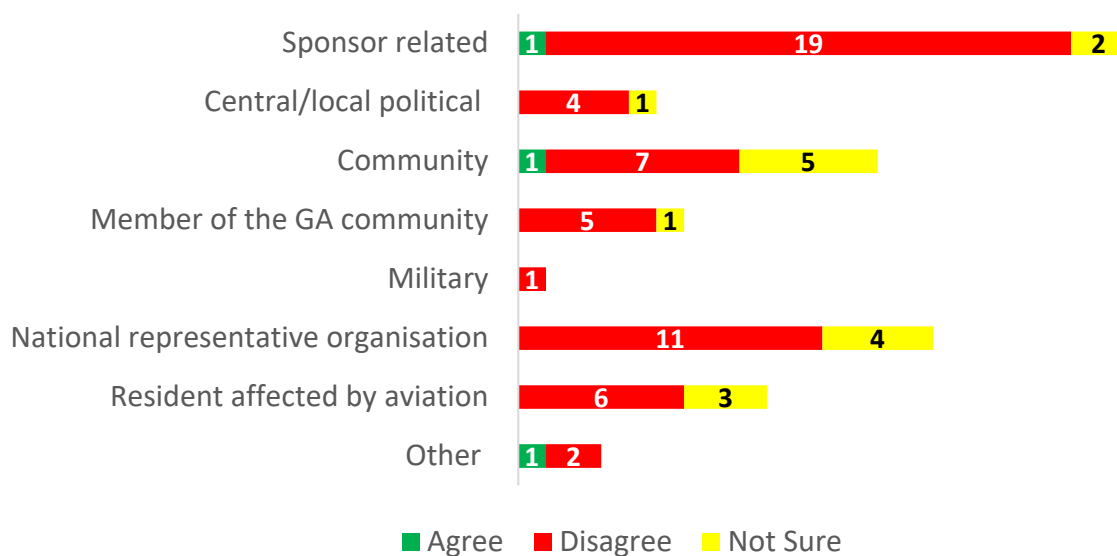
Option 4: Rename parts - We could remove the numbering so that each part of the document simply includes a title	Agree	Disagree	Not Sure	Grand Total
Sponsor related	7	7	8	22
Central/local political	2	1	2	5
Community	3	6	5	14
Member of the GA community	2	5	2	9
Military	1	0	0	1
National representative organisation	1	9	4	14
Resident affected by aviation	5	3	3	11
Other	2	0	1	3
<b>Grand Total</b>	<b>23</b>	<b>31</b>	<b>25</b>	<b>79</b>

**Table 8** – Question 3 Option 4: Rename parts - We could easily remove the numbering so that each part of the document simply includes a title.

3.3.9 The chart below (**Figure 9**) shows the responses to Option 5 by stakeholder. 74% (55 out of 74) respondents disagreed with doing nothing in relation to simplifying the structure of CAP 1616. The military respondent and 86% (19 out of 22) of Change Sponsors felt that the structure should be simplified. Community representatives had the highest number of respondents who were not sure about the statement (38%, 5 out of 13).

**Figure 9**

5. Do Nothing (respondent type by number for question 3)



**Figure 9 - Do Nothing (respondent type by number for question 3)**

Option 5: Do Nothing	Agree	Disagree	Not Sure	Grand Total
Sponsor related	1	19	2	22
Central/local political	0	4	1	5
Community	1	7	5	13
Member of the GA community	0	5	1	6
Military	0	1	0	1
National representative organisation	0	11	4	15
Resident affected by aviation	0	6	3	9
Other	1	2	0	3
<b>Grand Total</b>	<b>3</b>	<b>55</b>	<b>16</b>	<b>74</b>

**Table 9 - Question 3 Option 5: Do Nothing**

- 3.3.10 Open text responses to the consultation questions via a free text box at Question 4 gave some insight into why stakeholders responded in the way that they did to the options presented for Question 3.

Many stakeholders were of the view that irrespective of which option or options were progressed, there was a need to simplify CAP 1616:

***“Whichever option is chosen the document needs to be made simpler to access and read.”*** [Member of the General Aviation community.](#)

- 3.3.11 Two key themes were the complexity of the layout which was considered difficult to follow and the complexity of the content:

***“Only the most expert diligent legal mind is capable of following the intricate detail of all your documentation.”*** [Resident affected by aviation.](#)

***“The CAP 1616 document is too complicated, all changes which simplify this will provide greater clarity and ensure that sponsors and stakeholders can better understand the process. This will better enable faster, more consistent, and efficient ACPs and, ultimately, an efficient and modern airspace.”*** [National representative organisation.](#)

- 3.3.12 Stakeholders welcomed the CAA’s intention to remove inconsistencies and made various suggestions for improvements. These included clearer signposting, provision of checklists and case study examples, placement of flowcharts for the stages at the start of each stage and provision of flowcharts that show which requirements are relevant to each type of Airspace Change Proposal. A request was made for clearer direction for multi-airport, interdependent Airspace Change Proposals under the FASI programme<sup>7</sup>. The European Union Aviation Safety Agency (EASA) “easy access” documents<sup>8</sup> were suggested as a good template to use to improve accessibility. Creation of an electronic version of CAP 1616 that automatically populates relevant sections into a process document for specific types of Airspace Change Proposal was also suggested. The view was expressed that all stakeholders should have access to the same content:

***“It is important that all stakeholders see the same version of CAP 1616. There should be no “dumbing down” of versions for the public or more details given to other stakeholders. It should be clear to all what the legal obligations on ACP proposers are and the process steps they must follow.”*** [Local representative organisation.](#)

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<sup>7</sup> The Future Airspace Strategy Implementation (FASI) programme is the combined programme of airspace changes to air traffic route structures in the UK.

<sup>8</sup> [Easy Access Rules | EASA \(europa.eu\)](#)

- 3.3.13 One consultee felt that the CAA's plan to incorporate the contents of CAP 1818<sup>9</sup> into the next version of CAP 1616 was inconsistent with the intention to simplify the document and contrary to the CAA's intention not to make CAP 1616 the single publication for all types of Airspace Change Proposal:
- “CAP 1618 is currently a concise and well-targeted publication and users may be drawn needlessly into a much more complex document...the idea seems at odds with the CAA having rejected the high-level proposal to make CAP 1616 the single publication for all types of ACP.”*** **National representative organisation.**
- 3.3.14 One consultee stated that the current CAP 1616 Airspace Change Process only benefitted those who were well funded and that the proposed changes do not address this issue. They felt that the overall Airspace Change Process needed to change and suggested a single airspace design authority be put in place:
- “There must be an overall airspace design coordinator who is able to weigh up the needs of all airspace users in a transparent manner...Changes should be brought together in yearly or 6 monthly batches so those who are impacted are not faced with requests to respond to never ending consultations. Once the need for a change is agreed the design of the change should be removed from the sponsor, one airspace design authority must design the changes based on agreed criteria...”*** **Member of the General Aviation Community.**
- 3.3.15 Qualitative data for Option 1 (Producing separate publications for related guidance) shows that those stakeholders who agreed with this option considered that it had the potential to reduce the document's complexity and improve user experience:
- “(Option 1) has the potential to considerably improve the readability and usability of CAP 1616 by reducing its complexity. This could lead to a reduction in the time required for readers to understand and navigate the document, thereby improving overall efficiency.”*** **Other - UAS Operator and UTM Service Provider.**
- 3.3.16 Those who disagreed with the proposal provided views that separating out the guidance was an indication of an inherent incoherence in the document, that it would not simplify the process but lead to more cross-referencing by the reader which could add to complexity and result in confusion or the potential for Change Sponsors to miss important detail.
- “I worry that CAP 1616 is so vague and incoherent that it needs separate guidance. That would indicate that it is not well written or clear enough. Guidance required should be in the document in the sections it is required for, if at all.”*** **Change Sponsor – airports.**

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<sup>9</sup> CAP 1818 Airspace Design – unusual aerial activities published in the Aeronautical Information Publication

- 3.3.17 When considering Option 2 (**produce separate publications for different parts of CAP 1616**) the view was expressed that a single publication would be better for Change Sponsors with less experience of the Airspace Change Process:
- “Having a single publication for CAP 1616 would help less experienced sponsors to overlook all information in a single document.”*** **Change Sponsor – Space industry.**
- 3.3.18 The need for transparency was a key theme in the responses to the questions on structure. There was a view that splitting CAP 1616 into different documents could reduce transparency for those progressing from the Temporary Airspace Change Process to the Permanent Airspace Change Process:
- “This would make it less transparent for those initially applying to temporary ACPs or trial airspace to understand the process they would need to go through if they were to progress to permanent ACPs in the future.”*** **National representative organisation.**
- 3.3.19 Concern was expressed for those Change Sponsors already progressing Airspace Change Proposals:
- “Some change sponsors are halfway through CAP 1616; it is not always clear what will happen if Stages 1 and 2, say, are simplified after huge time, effort and expense has been expended to pass through the Gateways.”*** **National representative organisation.**
- 3.3.20 Some stakeholders considered that Option 3 (**create distinct sections within CAP 1616 for different types of ACP or by scaling level**) would make it easier to identify relevant requirements and reduce the confusion that can result from moving back and forth within the document:
- “Option 3 would improve the structure and clarity of the document significantly and would make it easier to identify the relevant requirements.”*** **National representative organisation.**
- 3.3.21 Others felt that this option would increase complexity:
- “If separate sections were created for the different scaling levels as per Option 3 this would only increase complexity of the document and make it harder to navigate.”*** **National representative organisation**
- 3.3.22 In responses to Option 4 (re-name parts) some stakeholders felt that this would add little benefit:
- “This will make the document more difficult to read, cross referencing impossible and any consultation/response process more confusing and difficult.”*** **Community noise group**
- 3.3.23 The point was made that for current users of CAP 1616 retaining the numbering might be more beneficial for consistency but that the overall need was to enable navigation:

***“...some current users may prefer to maintain consistency; the importance is the clarity of how the document is presented at the start of the document to allow users to navigate appropriately”.*** **National representative organisation**

3.3.24 In terms of the do-nothing Option 5 (do-nothing), it was clear that the majority took the view that this was not a viable option:

***“Very clearly do nothing is not an option as the CAA and stakeholders that we are involved with have identified that complexity should be removed”.***  
**Change Sponsor – Air Navigation Service Provider**

#### **CAA response on structure (Questions 3 and 4)**

3.3.25 We will simplify the structure of CAP 1616 by separating the regulatory requirements (i.e., the things that “must” be done) of the Airspace Change Process from the related guidance (i.e., how it “could” or “should” be done). The main document will focus on the Airspace Change Process and regulatory requirements, and a suite of Guidance Documents will be produced. The current appendices will be removed (we will provide access to a glossary). This will reduce the volume of CAP 1616, provide clearer separation and make it easier for the CAA to update each of the publications.

3.3.26 We recognise that in progressing consultation Option 1 we are going against the majority view. However, we believe that this is the best way to consolidate the information that stakeholders need to know about the Airspace Change Process into a single document. There will no longer be a need to move between the stages and appendices as is currently the case. While there will be additional Guidance Documents, stakeholders will only have to refer to one Airspace Change Process document at any one time. It will meet stakeholders’ interests and objectives by making the document more user-friendly, with improved access, clarity, and ability to navigate. Clear referencing and links will ensure that readers can easily navigate between main document with regulatory requirements, and the related guidance in separate documents if they seek further information.

3.3.27 We plan to focus the content of CAP 1616 specifically on detailing the regulatory requirements for Permanent and Temporary Airspace Change Proposals and Airspace Trials. We will significantly reduce and simplify the content of CAP 1616 by producing separate publications for the following parts:

- **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) and **Part 2a** – Temporary PPR changes
- **Part 3** – Airspace information: transparency about airspace user and aircraft movements.

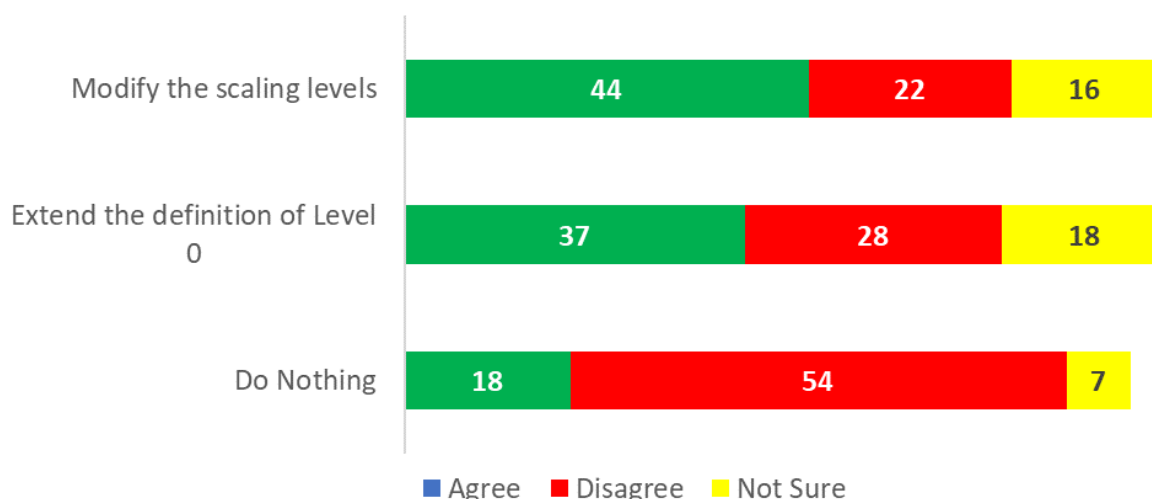


- 3.3.28 Part 1c content will be provided within a Guidance Document. Parts 2 and 2a content will be provided within a separate publication. We believe that this will be the best way to consolidate and present relevant information for stakeholders. The PPR process was implemented in 2020. We said that we would review the PPR process three years after implementation and so it makes sense to separate Part 2 and Part 2a PPR changes from CAP 1616 now.
- 3.3.29 Depending on the type/level of Airspace Change Proposal, the reader will be referred to the relevant Guidance Document within the suite of Guidance Documents that will support the content of the main Airspace Change Process document.
- 3.3.30 We will split the current parts of CAP 1616 into separate publications. This means that Part 1C process for RNP Instrument Approach Procedures (IAPs) without an Approach Control Service, Part 2 PPR changes and Part 3 Airspace information will become separate publications. We plan to remove the numbering applicable to the current Parts of CAP 1616 so we will remove references to Parts 1, 1a, and 1b and refer to these Parts using headers, i.e., for Permanent Airspace Change Proposals, Temporary Airspace Change Proposals and for Airspace Trials.
- 3.3.31 For those stakeholders concerned about any potential impact on Change Sponsors already progressing Airspace Change Proposals, the outputs and regulatory requirements will remain the same as before but, as we will explain later in this document, some will be in a different order. We will provide more clarity in CAP 1616 on the requirements that must still be met. We have discussed this further in Chapter 4 Next Steps.
- 3.3.32 We will also progress some of the other suggestions made by stakeholders to make improvements to the structure of CAP 1616. For example, we will move the flowcharts from the end to the start of each stage, introduce a flowchart for Airspace Trials, while also considering the possibility of developing some case study examples. Some suggestions, for example the provision of checklists, are addressed elsewhere within this report.
- 3.3.33 In response to the suggestion that a single design authority be put in place, it is mainly airports and air navigation service providers that sponsor Airspace Change Proposals under the current delivery model. The CAA oversees the Airspace Change Process and adjudicates in a pure regulatory mode. We agree that there should be consideration of whether airspace design should continue to be delivered within the current model. The CAA and DfT are reviewing the current delivery model while remaining cognisant of existing airspace change activities. This is outside the scope of this consultation and any proposed changes will be subject to separate consultation.

## 3.4 Scaling Levels: Proportionate Scaling of Assessment

3.4.1 The second consultation theme considered modification of scaling levels that reflect the characteristics of the airspace change and further scaling of the Airspace Change Process where it is proportionate to do so. In this section we present our analysis of the results for questions 5, 6 and 7 on this theme.

**Figure 10** Question 5 Review the scaling levels (number)



**Figure 10** - Question 5: Review the scaling levels

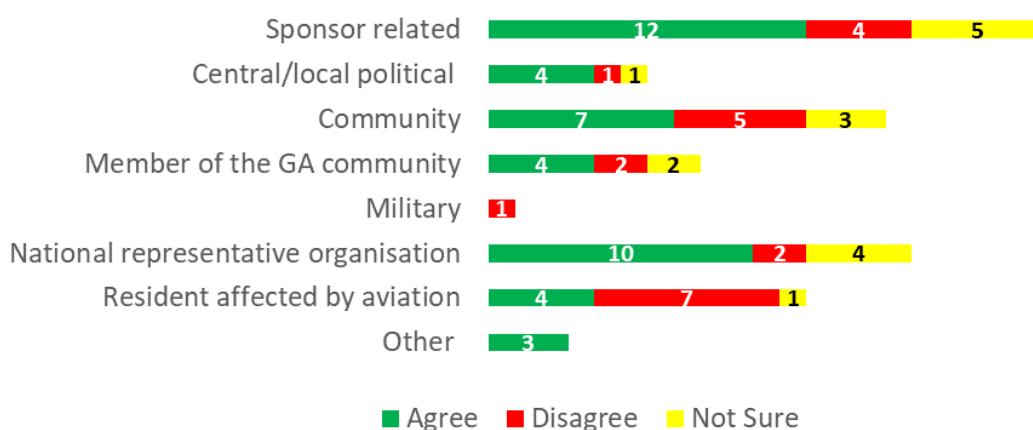
Please indicate if you agree, disagree or are not sure about the options: Scaling: Review scaling Levels for Airspace Change Proposals	Agree	Disagree	Not Sure	Grand Total
Modify the scaling levels	44	22	16	82
Extend the definition of Level 0	37	28	18	83
Do Nothing	18	54	7	79

**Table 10** - Question 5: Review the scaling levels.

3.4.2 The chart in **Figure 10** above illustrates the respondents' views on three options which were presented in relation to making modifications to the scaling levels of CAP 1616. More than half of respondents (54%, 44 out of 82) agreed with the first option ("modify the scaling levels"), while 27% (22 out of 82) disagreed. 20% (16 out of 82) were not sure about this option. 45%, (37 out of 83) agreed with the second option ("extend the definition of Level 0"), while 34% (28 out of 83) disagreed and 18 respondents (22%) were unsure about this option. The third option ("do nothing") was disagreed with by 68% (54 out of 79) respondents, while 23% (18 out of 79) respondents agreed. Seven (9%) respondents were not sure about this option.

3.4.3 The charts in **Figures 11, 12 and 13** below show how different types of stakeholders responded to the statements above. The chart below (**Figure 11**) shows that over half of Change Sponsors agreed with the option to modify the scaling levels (57%, 12 out of 21). Similarly, national representative organisations had a high proportion of those who agreed (63%, 10 out of 16). Conversely, residents affected by aviation had over half of respondents (58%, 7 out of 12) disagreeing with this option. The military respondent also disagreed.

**Figure 11** Modify the scaling levels (respondent type by number for question 5)



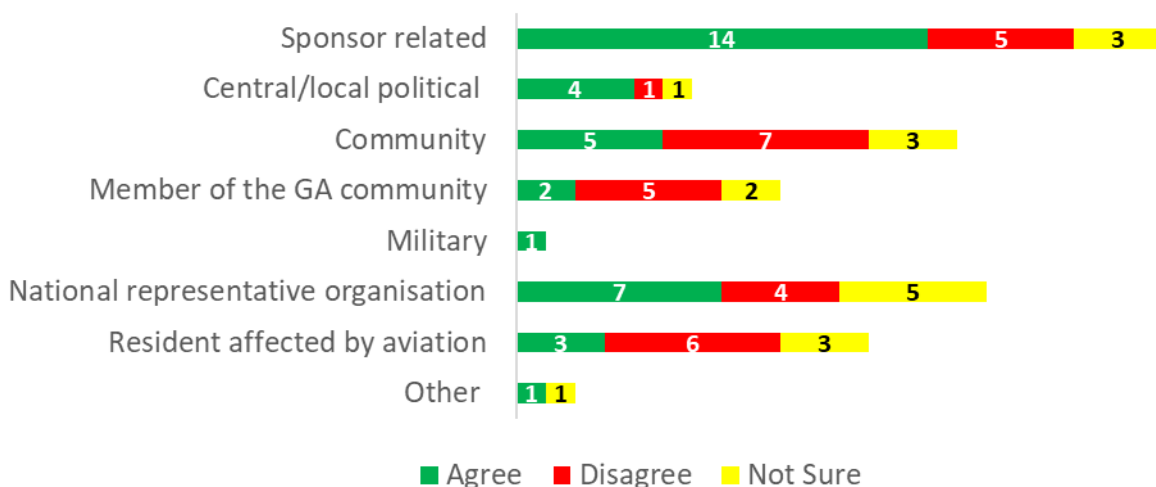
**Figure 11** - Modify the scaling levels (respondent type by number for question 5)

Option 1: Modify the scaling levels	Agree	Disagree	Not Sure	Grand Total
Sponsor related	12	4	5	21
Central/local political	4	1	1	6
Community	7	5	3	15
Member of the GA community	4	2	2	8
Military	0	1	0	1
National representative organisation	10	2	4	16
Resident affected by aviation	4	7	1	12
Other	3	0	0	3
<b>Grand Total</b>	<b>44</b>	<b>22</b>	<b>16</b>	<b>82</b>

**Table 11** - Question 5 Option 1: Modify the scaling levels.

3.4.4 The chart below (**Figure 12**) shows how stakeholders responded to an option to extend the definition of Level 0. Members of the GA community and residents affected by aviation had the highest proportion of those who disagreed with this option (56%, 5 out of 9 and 50%, 6 out of 12 respectively), followed by community representatives where 47% (7 out of 15) respondents disagreed. In contrast, the military respondent was in support of this option, along with (64%, 14 out of 22) of Change Sponsors.

**Figure 12** 2. Extend the definition of Level 0 (respondent type by number for question 5)



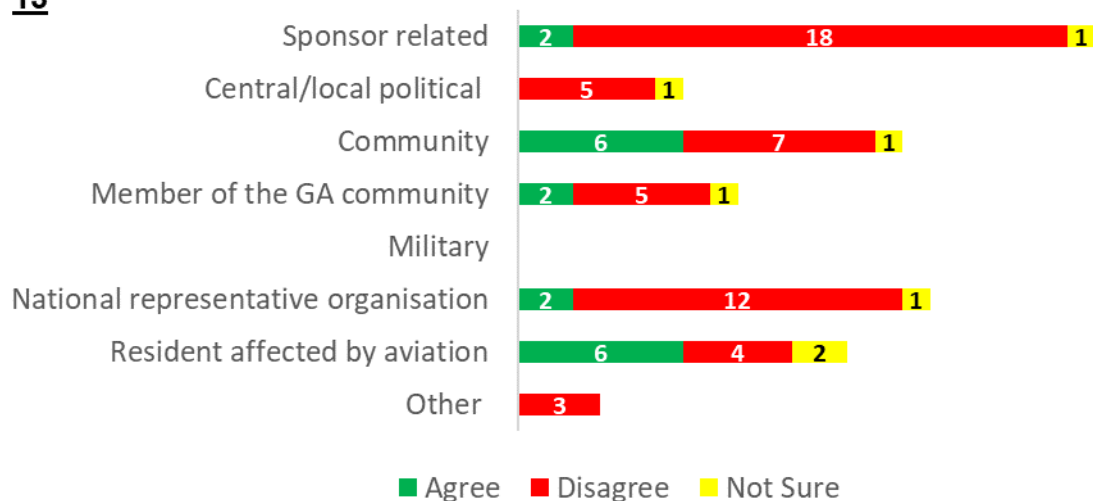
**Figure 12** - Extend the definition of Level 0 (respondent type by number for question 5)

Option 2: Extend the definition of Level 0	Agree	Disagree	Not Sure	Grand Total
Sponsor related	14	5	3	22
Central/local political	4	1	1	6
Community	5	7	3	15
Member of the GA community	2	5	2	9
Military	1	0	0	1
National representative organisation	7	4	5	16
Resident affected by aviation	3	6	3	12
Other	1	0	1	2
<b>Grand Total</b>	<b>37</b>	<b>28</b>	<b>18</b>	<b>83</b>

**Table 11** - Question 5 Option 2: Extend the definition of Level 0

3.4.5 The chart below (**Figure 13**) shows that 86%, (18 out of 21) of Change Sponsors 84%, (5 out of 6) central/local political representatives and 80% (12 out of 15) national representative organisations felt that there should be modifications to scaling levels. Our analysis found that 63% (5 out of 8) members of the GA community disagreed with leaving the scaling levels 'as-is'. 50% (6 out of 12) residents affected by aviation agreed with doing nothing.

**Figure 13** 3. Do Nothing (respondent type by number for question 5)



**Figure 13 - Do Nothing (respondent type by number for question 5)**

	Agree	Disagree	Not Sure	Grand Total
<b>Option 3: Do Nothing</b>				
<b>Sponsor related</b>	2	18	1	21
<b>Central/local political</b>	0	5	1	6
<b>Community</b>	6	7	1	14
<b>Member of the GA community</b>	2	5	1	8
<b>Military</b>	0	0	0	0
<b>National representative organisation</b>	2	12	1	15
<b>Resident affected by aviation</b>	6	4	2	12
<b>Other</b>	0	3	0	3
<b>Grand Total</b>	18	54	7	79

**Table 13 - Question 5 Option 3: Do Nothing**

- 3.4.6 An open text response to the question about scalability gave some insight into why stakeholders responded the way they did. Some stakeholders supported the modification of scaling levels and extending the definition of Level 0, however felt that there should also be clearer guidance based upon the relevant impact of the change to lessen the complexity of the Airspace Change Process.

***“We do support Option 1 but recognise that more work is required. For example, the document should have clearer guidance based upon the relative impact of the change. This would potentially then have benefits in scalability for the rest of the airspace change process including engagement, removal of irrelevant steps or activities, and improve the smooth progression through the relevant stage gateways.”*** [Change Sponsor – Air Navigation Service Provider](#).

***“Simplifying the scaling levels or extending the definition of Level 0 would both simplify the guidance but make the process no less complex.”*** [National representative organisation](#).

***“Option 1: A new Level 3 would be advantageous as it gives clarity between “anticipated minimal impact” and “no impact”. However, the Level 3 scaling proposal doesn’t go far enough. This needs better definition as to what would be included for clarity on what advantage this Option would/could provide.”*** [Change Sponsor – Airport](#).

- 3.4.7 Generally, Change Sponsors wished to see a more proportionate approach to scaling because of resource implications for them. It was voiced that it is only worth creating additional levels if there is guidance provided as to how scaling can be applied by the Change Sponsor.

***“If the scaling is managed correctly then sponsor workload should go down which will be a positive development.”*** [Change Sponsor – Air Navigation Service Provider](#).

- 3.4.8 Some stakeholders including national representative organisations, central or local government representatives and Change Sponsors questioned the wording of the proposed new level definitions and felt that more clarification is required as to the criteria proposed to determine the new levels.

***“We do not support including subjective assessments of community impacts in the definitions of scaling levels, such as “... with medium to low impacts on aviation and/or non-aviation stakeholders”. We believe altitude criteria should be the primary determinant of scaling levels.”*** [National representative organisation](#).

***“We are concerned that extending definition of Level 0 ACPs could allow ACPs which may in fact have detrimental impacts on residents. We believe***

***scale of impacts should be designed by objective criteria such as altitude.”***  
**Central or local government body.**

***“We note that the interpretation and application of the proposal would be a problem. For example, there is no definition or guidance to determine what constitutes a “negligible impact”.”*** **Change Sponsor – Airport.**

***“Regarding Question 5, Option 1 provides improved streamlining for low-impact changes, but further clarification is needed on the boundaries of Level 3 versus Level 1. Option 2 does not change the current ‘Level’ nomenclature so retains consistency with ACPs already in-progress, but it does not differentiate between major and minor changes to traffic patterns below 7,000ft. There should be a streamlining for the latter. The current process is not sufficiently scalable for minor changes so disagree with Option 3.”*** **National representative organisation.**

- 3.4.9 A military stakeholder raised concerns about how the new levels would apply to military related Airspace Change Proposals and asked how the existing ‘M’ levels would fit in.

***“We do not support this option without some further clarification. Where would potential to alter traffic patterns below 7000ft over inhabited area but with medium or low impacts be captured? For MOD ACPs, is the expectation that the new proposed levels would then be given M prefix as in the extant CAP 1616? How is high/medium/low impact being measured (what metrics?)?”*** **Military**

- 3.4.10 New entrants want more clarity on where they’d fit in and asked for examples of changes which would be classified as Level 0 to be provided. They voiced that the guidance would need to be reviewed iteratively to ensure it is relevant to new entrants and technologies.

***“Extending the definition of Level 0 would require some specific use cases/examples of changes which would fall under Level 0. One may be RPAS operated in Very Low-Level Airspace (VLL) over the sea or initial air taxi operations. Also, as access to VLL airspace is likely to evolve over the coming years, the CAA will need to continue to iterate the guidance to be relevant to new entrants and technological and industrial advancement.”***  
**National representative organisation and Change Sponsor – Unmanned Aerial Systems (UAS)/ Remotely Piloted Aircraft Systems (RPAS) (gave same response).**

- 3.4.11 Some community stakeholders are against extending the definition of Level 0 because of the potential consequence of material impact.

***“We do not support Option 2, extending the definition of Level 0 ACPs. We are concerned that changes that the CAA and sponsors might regard as***

***having low or negligible impacts could in fact have material community impacts. For example, it is not necessarily the case that a change that releases controlled airspace would have low impacts, because it would open the airspace up to other users which might have community impacts.*** **Local representative organisation.**

***“We do not agree with Option 2. A level 0 proposal that is claimed by a sponsor to have negligible impact may turn out to be highly material. It may not be the case that an airspace change that releases controlled airspace can be assured to have low noise impact.”*** **Central or local government body.**

- 3.4.12 Some stakeholders felt that Airspace Change Process for Level 1 and Level 2 Airspace Change Proposals should ensure that potential impacts for communities are assessed and mitigated.

***“Level 1 and Level 2 ACPs refer to changes that are likely to have a significant impact on the environment, including noise and pollution. These changes must undergo a comprehensive environmental assessment and community consultation process to ensure that the potential impacts on local communities are adequately assessed and mitigated.”*** **Community noise group.**

***“The requirements of and oversight on ACPs must reflect the potential impact of the change proposed. There is logic in making very simple changes such as route name amendments part of a more streamlined process. However, ACPs particularly at Level 1, and to some extent at Level 2, that could impact communities around airports (in terms of noise and pollution) must have the fullest level of scrutiny and oversight. They can have fundamental impacts of the quality-of-life day to day for hundreds of thousands of people.”*** **Local representative organisation.**

- 3.4.13 Some stakeholders felt that defining the baseline may affect the assessment of scaling and therefore supported the early definition of the baseline but voiced that the existing scaling levels would be sufficient in this case. Other stakeholders disagreed with modifying the scaling levels but wished to see clearer guidance on the meaning of the existing levels.

***“We suggest it would not be appropriate to scale prematurely - for example the establishment of a baseline may affect the assessment of scaling. Therefore, we propose no change to scaling, but an early establishment of baseline.”*** **Community noise group.**

***“In relation to the scaling definitions, it would seem less confusing for stakeholders to retain as existing but develop clear guidance on their meaning (rather than to redefine or introduce an additional level).”*** **National representative organisation.**

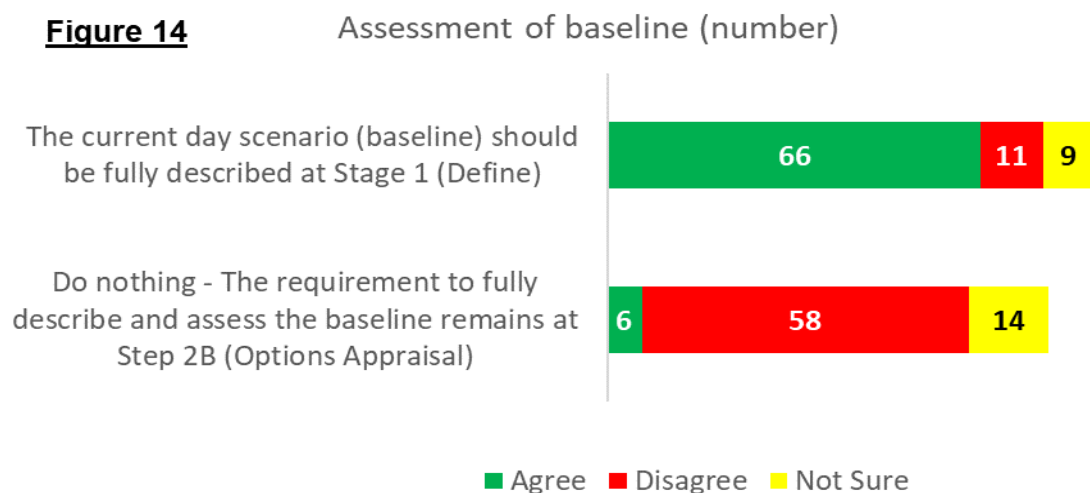


**CAA response on scaling (Questions 5 and 7)**

- 3.4.14 To support the application of proportionality, we will modify the definitions of the scaling levels. The levels will be captured in the new document set, with guidance on the associated Airspace Change Process requirements for each level, which will be scaled according to anticipated impact. We recognise some stakeholders requested clarification on the proposed level definitions. The revised CAP 1616 will take this feedback into account by providing guidance on the criteria used to determine different levels.
- 3.4.15 In response to the feedback received regarding ‘Option 1 – to modify the scaling levels’, the levels will be modified to Levels 1, 2 and 3 with revised definitions. We will ensure that the revised CAP1616 clearly explains how each of the Airspace Change Process requirements are scaled accordingly. The main Airspace Change Process document will define the levels and our suite of Guidance Documents will give detail on how the Airspace Change Process requirements can be scaled for each level.
- 3.4.16 In response to the feedback received regarding ‘Option 2 – extend the definition of Level 0’, we will be amending the levels as detailed above. A separate Guidance Document for Level 3 (low impact Airspace Change Proposals) will also be provided.
- 3.4.17 Regarding the feedback received relating to how the modified levels would apply to Airspace Change Proposals sponsored by the Ministry of Defence and how the existing ‘M’ levels would fit in, we plan to remove references to M1 and M2, and any environmental requirements for military Airspace Change Proposals will be addressed within the new document set.
- 3.4.18 As with the current Airspace Change Process, a provisional level will be assigned at the assessment meeting. The assessment meeting will also provide an opportunity for the CAA to advise which Airspace Change Process requirements and Guidance Documents are required for the provisional level that the Airspace Change Proposal has been assigned.

## Assessment of Baseline

3.4.19 Question 6 of the consultation survey asked respondents for their views on the high-level proposal regarding when the baseline should be assessed. Respondents were asked whether they agreed, disagreed or were not sure on the options presented in **Figure 14** below and were asked to elaborate on their answer in question 7.



**Figure 14 - Question 6: Assessment of baseline**

Please indicate if you agree, disagree or are not sure about the following options: Scaling: Baseline assessment	Agree	Disagree	Not Sure	Grand Total
The current day scenario (baseline) should be fully described at Stage 1 (Define)	66	11	9	86
Do nothing - The requirement to fully describe and assess the baseline remains at Step 2B (Options Appraisal)	6	58	14	78

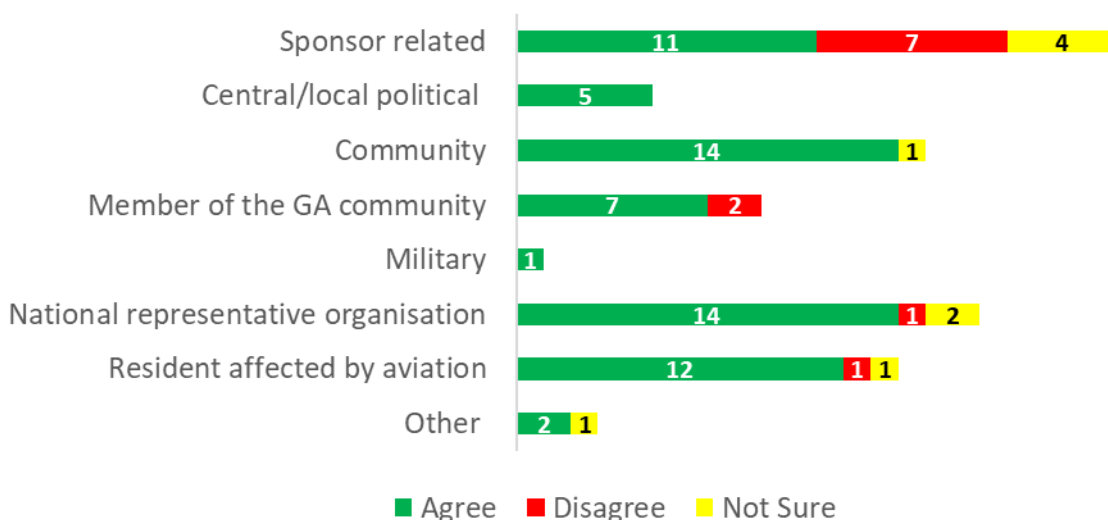
**Table 14** Question 6: Assessment of baseline

3.4.20 **Figure 14** above shows that 77% (66 out of 86) of stakeholders who responded agreed with the statement that the baseline should be fully described at Stage 1 (Define), with 13% (11 out of 86) disagreeing and 10% (9 out of 86) being unsure. Following this, 74% (58 out of 78) of respondents who gave their views on the second statement disagreed that the requirement to fully describe and assess the

baseline should remain at Step 2B (Options Appraisal), with 8% (6 out of 78) agreeing and 18% (14 out of 78) being unsure.

3.4.21 The charts in Figures 15 and 16 below show how different types of stakeholders responded to the statements above. Responses are represented in figures as numbers were too low to be meaningful as percentages.

**Figure 15** The current day scenario (baseline) should be fully described at stage 1 (define) (respondent type by number for question 6)



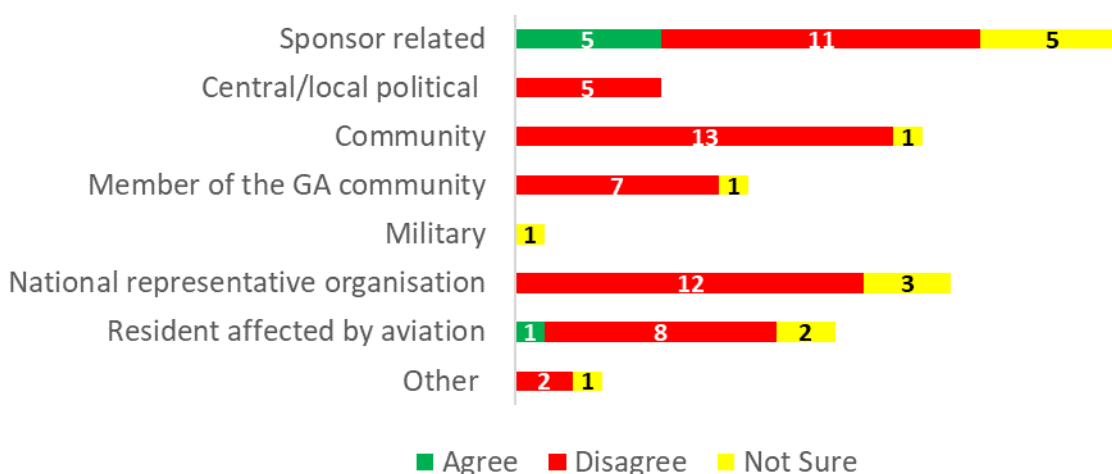
**Figure 15** - The current day scenario (baseline) should be fully described at Stage 1 (respondent type by number for question 6)

3.4.22 The chart in **Figure 15** above shows that all central/local political respondents and the military representative agreed that the baseline should be fully described at Stage 1. 93% (14 out of 15) of community representatives and 86% (12 out of 14) of residents affected by aviation had the next highest proportions of those who agreed with this option. In contrast, although half of Change Sponsors (50%, 11 out of 22) agreed with the option, almost a third (32%, 7 out of 22) disagreed, with 4 being unsure. Therefore, out of the 86 stakeholders who responded to this option, 11 (13%) disagreed and 7 of those 11 (64%) identified as Change Sponsors.

Option 1: The current day scenario (baseline) should be fully described at Stage 1 (Define)	Agree	Disagree	Not Sure	Grand Total
Sponsor related	11	7	4	22
Central/local political	5	0	0	5
Community	14	0	1	15
Member of the GA community	7	2	0	9
Military	1	0	0	1
National representative organisation	14	1	2	17
Resident affected by aviation	12	1	1	14
Other	2	0	1	3
<b>Grand Total</b>	<b>66</b>	<b>11</b>	<b>9</b>	<b>86</b>

**Table 15** Question 6 Option 1: The current day scenario (baseline) should be fully described at Stage 1 (Define)

**Figure 16** . Do nothing - The requirement to fully describe and assess the baseline remains at Step 2B (Options Appraisal) (respondent type by number for question 6)



**Figure 16** - Do Nothing - The requirement to fully describe and assess the baseline remains at Step 2B (respondent type by number for question 6)

3.4.23 Correspondingly to the responses to Option 1, the chart in **Figure 16** above shows that 73% (8 out of 11) of residents affected by aviation, 93% (13 out of 14) of community representatives and 88% (7 out of 8) of the respondents from the GA community disagreed with leaving the requirement to fully describe and assess the baseline at Step 2B. Again, although just over half of Change Sponsors (52%, 11

out of 21) disagreed with this option, 23% (5 out of 22) agreed with the option to 'do nothing' and keep the requirement to define the baseline fully at Step 2B. Out of the 78 stakeholders who responded to this option, 6 respondents agreed, 5 of which (84%) identified as Change Sponsors.

<b>Option 2: Do nothing - The requirement to fully describe and assess the baseline remains at Step 2B (Options Appraisal)</b>	<b>Agree</b>	<b>Disagree</b>	<b>Not Sure</b>	<b>Grand Total</b>
<b>Sponsor related</b>	5	11	5	21
<b>Central/local political</b>	0	5	0	5
<b>Community</b>	0	13	1	14
<b>Member of the GA community</b>	0	7	1	8
<b>Military</b>	0	0	1	1
<b>National representative organisation</b>	0	12	3	15
<b>Resident affected by aviation</b>	1	8	2	11
<b>Other</b>	0	2	1	3
<b>Grand Total</b>	6	58	14	78

**Table 16** - Question 6 Option 2: Do Nothing

3.4.24 Qualitative data from the survey (Question 7) revealed further insight into why respondents responded in the manner they did. Generally, Change Sponsors were in favour of defining the baseline at an earlier stage, with some commenting that this would save both time and cost, which would in turn make the Airspace Change Process more effective. Some Change Sponsors agreed that the baseline should be introduced in Stage 1 but stated that further clarification as to the extent of data provision at Stage 1 would be required.

***“Fully describing the baseline at Stage 1 could streamline the ACP process by anticipating and addressing potential issues earlier on. This would likely save time and resources, and lead to a more efficient and effective process overall.”*** **Change Sponsor – Unmanned Aerial Systems (UAS)/Remotely Piloted Aircraft System (RPAS).**

***“We agree in principle with the introduction of a baseline at Stage 1, however this needs further scoping to determine the extent of data provision.”*** **Change Sponsor – Air Navigation Service Provider.**

***“I think the baseline should be described and agreed early so stakeholders have clarity when looking at design principles and a baseline could inform these.”*** **Change Sponsor – Airport.**

- 3.4.25 As above, a military stakeholder supported definition of the baseline during Stage 1, but only if this required qualitative assessments, voicing a concern that quantitative assessments would require more resource at this stage.

***“We support providing a full description of baseline during Stage 1, providing this means qualitative environmental or other assessments rather than quantitative. The latter would introduce too much resource burden at Stage 1.” Military***

- 3.4.26 Other Change Sponsors including new entrants felt that there should be more flexibility with regards to defining the baseline, where some felt that defining the baseline at Stage 1 should be optional but not mandatory. Some Change Sponsors requested clarification on the requirements for Step 1B engagement if this proposal was implemented.

***“Space stakeholders require more flexibility for their operations. A current day scenario defined at Stage 1 would have likely already changed at Step 2B.” Change Sponsor – Space industry.***

***“If this option is taken forward, it needs to be an option should a sponsor want or feel the need to. Defining the baseline should not put too onerous requirements on an airport. (Some airports have limited existing noise analysis and it could be costly to carry this out early on, only to find it is not required later. The level of definition required for the current day baseline should account for this). Clarification on whether this should form part of Stage 1B engagement would also be needed.” Change Sponsor – Airspace Change Consultancy.***

***“The baseline is likely to change over the course of major ACPs that take many years to progress and therefore we believe the Sponsor should choose whether they present the baseline early. We do not support making the full description of the baseline in Stage 1 a requirement, but instead making clear that there is the option to present it early – thus introducing more flexibility.” Change Sponsor – Airport.***

- 3.4.27 Community groups, local government organisations and General Aviation stakeholders felt that defining the baseline at an earlier stage would increase transparency of the Airspace Change Process, including giving insight into what will be consulted upon, and promote increased trust in Change Sponsors. Overflight was a key concern, with community noise groups voicing that defining the baseline earlier would give them greater opportunity to communicate and understand the issues, providing better clarity for overflown communities.

***“The current day scenario (baseline) should be fully described at Stage 1 (Define). We agree that this option would aid communities understand the impacts of current operations at an airport and ensure that they can raise***

***their concerns about proposed changes at the earliest opportunity.”***  
**Community noise group.**

***“Fully describing the Baseline scenario at the earlier stage would appear to be preferable, if it is made clear to consultees the limits of what is being consulted upon.”*** **Central or local government body.**

***“Establishing the baseline earlier is an obvious logical step and starts at least to reduce the perceived confusion in the present process. This baseline needs to be defined clearly and unambiguously and the necessary data defined at the outset. It would in particular enable me to be able to better understand the process.”*** **Member of the General Aviation community.**

- 3.4.28 Some local representative bodies and community noise groups suggested that the Statement of Need should be better utilised to define the baseline. Some stakeholders (local representative bodies and community noise groups) proposed an inclusion of an enhanced base case at Stage 2, considering noise improvements.

***“Communities have long expressed the need to reduce noise impact on health and well-being, but this is not meaningfully addressed by the Statement of Need. The Statement of Need should also state the spatial Study Area and the time horizon”*** **Community noise group.**

***“It is essential to describe fully in Stage 1 the Base Case (do nothing / minimum option), along with the Statement of Need and evaluation criteria of the airspace change process, particularly in relation to environmental impacts. This would help provide a useful basis for comparison through the ACP process. In Stage 2, this could then be developed to help explore options for operational improvements that could be delivered based on the current flight paths. Again, this would provide useful opportunities to compare different impacts of existing routes and proposed changes. This is standard practice in public sector option appraisal in order to form a robust benchmark against which all change options can be judged. This will minimise the risk of pre-judging outcomes, enhance transparency and public trust, and help to lead to better and more objective decision making.”***  
**Local representative organisation.**

***“Within Stage 2 there should also be a requirement for an Enhanced Base Case (do minimum but with noise improvements that can be achieved with or without PBN and without significant changes to flight path distribution below 7000 feet) option to be defined and developed. This should take account of improvements that can be achieved without radical changes in flight paths.”*** **Local representative organisation.**

- 3.4.29 Some stakeholders called for greater clarity with regards to the terminology used to describe the baseline to remove any ambiguity in the Airspace Change Process.

***“Regarding baseline terminology; a great deal of ambiguity is inherent in the use of the term baseline in different time contexts. Currently it describes the ‘now’ situation and the projected situation at a later date (time of implementation); at the projected implementation date this baseline is used as a comparator against each future option. The timing context is critical and needs to be described more clearly to remove this ambiguity. We strongly suggest different terminology is used consistently throughout the document: for example, ‘Current Position’ [the now] and ‘Assessment Baseline’ [to be used as the comparator].”*** [Change Sponsor – Approved Procedure Design Organisation.](#)

### **CAA response on assessment of the baseline (Questions 6 and 7)**

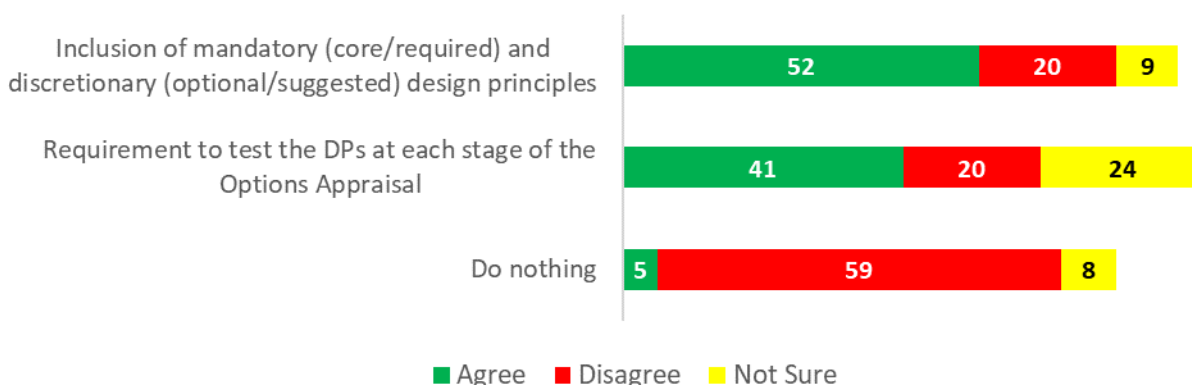
- 3.4.30 To align with those respondents who were in favour of ‘Option 1 - the baseline being fully described at Stage 1 (Define)’, and from lessons learnt during the application of the current Airspace Change Process, this will become a new requirement. This should increase transparency in the Airspace Change Process for all stakeholders and promote increased trust in Change Sponsors for impacted communities, in addition to improving the effectiveness of the Airspace Change Process.
- 3.4.31 The new Guidance Document for Stages 1-7 will provide clarification as to the extent of data provision and terminology used to describe the baseline which will be required at Stage 1. A qualitative assessment of the baseline will be required at this stage, with the expectation that a quantitative assessment follows. However, Change Sponsors who already possess quantitative data to define the baseline are encouraged to submit this where available.
- 3.4.32 The Stage 1-7 Guidance Document will also clearly articulate the engagement requirements at Stage 1. The Change Sponsor will still be required to engage regarding their Design Principles and should share the baseline at this stage with stakeholders, allowing them to comment.
- 3.4.33 We acknowledge the suggestion regarding provision of an enhanced base case at Stage 2. We will provide guidance on developing options.
- 3.4.34 As per a suggestion to better utilise the Statement of Need to define the baseline/current day scenario, updates to the form are being implemented to ensure that it is better aligned with the requirements of the current Table A1 to capture more information from the Change Sponsor at this early stage in the Airspace Change Process.



## 3.5 Stages, Steps, and Gateways

- 3.5.1 The next consultation theme related to the stages, steps and gateways set out within CAP 1616. In this section we present our analysis of the results from survey questions 8 to 20 relating to this theme. Questions 8-10 focused on the high-level proposal relating to Design Principles (DPs), Design Options and/or Options Appraisal requirements.
- 3.5.2 Question 8 asked respondents whether they agreed, disagreed or were unsure about the options presented in **Figure 17** below. 64% (52 out of 81) of respondents stated that they agreed with the option to include mandatory and discretionary Design Principles within CAP 1616, while 25% (20 out of 81) disagreed with the remainder (11%, 9 out of 81) being unsure. Similarly, 48% (41 out of 85) respondents agreed that there should be a requirement to test the Design Principles at each stage of the Options Appraisal, with 24% (20 out of 85) disagreeing and the remaining 28% (24 out of 85) being unsure. Lastly, 82% (59 out of 72) felt that 'doing nothing' was not an option, while 7% (5) respondents agreed with doing nothing and 11% (8) were unsure.

**Figure 17** Question 8 Options regarding inclusion of mandatory and discretionary design principles (DPs) and testing DPs at each stage of Options Appraisal (number)



**Figure 17** - Question 8: Options regarding inclusion of mandatory and discretionary Design Principles and testing Design Principles at each stage of Options Appraisal

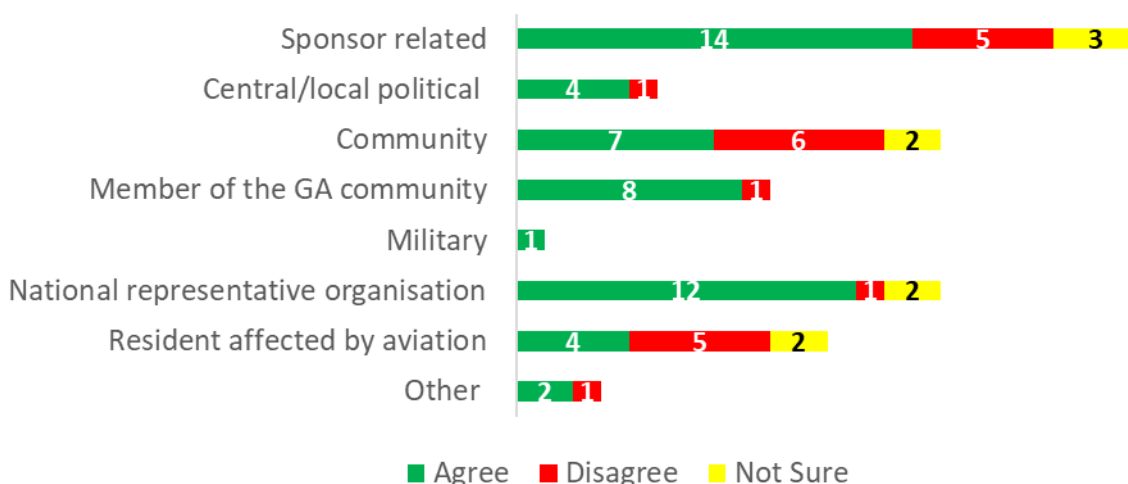
Please indicate if you agree, disagree or are not sure about the options below:	Agree	Disagree	Not Sure	Grand Total
Inclusion of mandatory (core/required) and discretionary (optional/suggested) Design Principles	52	20	9	81
Requirement to test the Design Principles at each stage of the Options Appraisal	41	20	24	85
Do nothing	5	59	8	72

Table 17 - Question 8: Review/clarify Design Principle requirements.

3.5.3 The charts in **Figures 18, 19 and 20** below show how different types of stakeholders responded to the options above.

3.5.4 The chart in **Figure 18** below shows that 64% of Change Sponsors (14 out of 22), 80% of central/local political stakeholders (4 out of 5) and national representative organisations (12 out of 15) and 89% of GA community respondents (8 out of 9) had high proportions of stakeholders who would support the inclusion of mandatory and discretionary Design Principles. The military respondent also supported this option. On the other hand, community representatives and residents affected by aviation had mixed views, with 47% (7 out of 15) community representatives agreeing, and 36% (4 out of 11) residents affected by aviation agreeing. 40% (6 out of 15) of community representatives and 45% (5 out of 11) of residents disagreed.

**Figure 18** 1. Inclusion of mandatory (core/required) and discretionary (optional/suggested) design principles (respondent type by number for question 8)



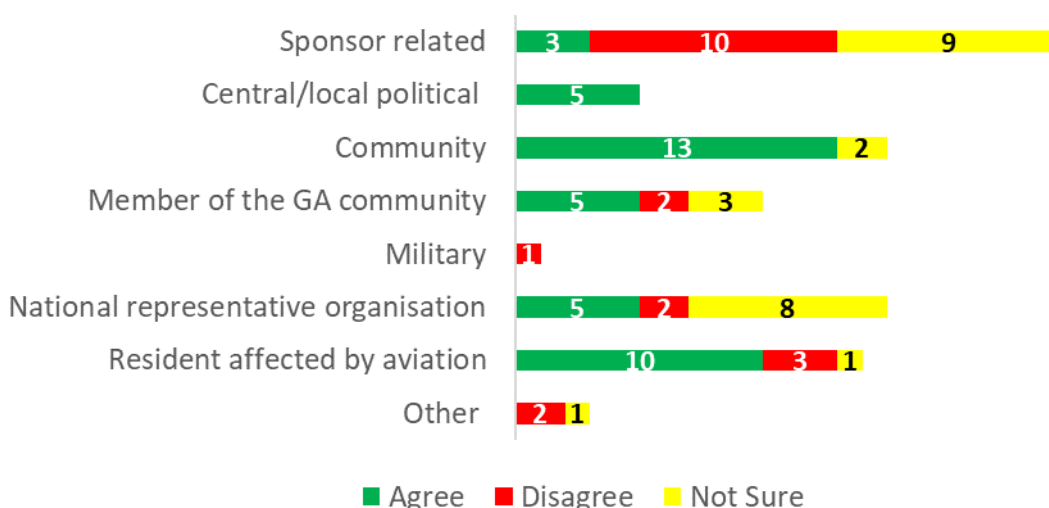
**Figure 18** - Inclusion of mandatory and discretionary Design Principles (respondent type by number for question 8)

Option 1: Inclusion of mandatory (core/required) and discretionary (optional/suggested) Design Principles	Agree	Disagree	Not Sure	Grand Total
Sponsor related	14	5	3	22
Central/local political	4	1	0	5
Community	7	6	2	15
Member of the GA community	8	1	0	9
Military	1	0	0	1
National representative organisation	12	1	2	15
Resident affected by aviation	4	5	2	11
Other	2	1	0	3
<b>Grand Total</b>	<b>52</b>	<b>20</b>	<b>9</b>	<b>81</b>

**Table 18** - Question 8 Option 1: Inclusion of mandatory and discretionary Design Principles

3.5.5 The chart in **Figure 19** below shows that the military respondent, 66 % (2 out of 3) stakeholders who identified within the “other” category and 45% (10 out of 22) of stakeholders who identified as Change Sponsors disagreed with the proposal to test the Design Principles at each stage of the Options Appraisal, In contrast, all central/local political respondents agreed with the proposal, in addition to 87% (13 out of 15) of community representatives and 71% (10 out of 14) of residents affected by aviation. National representative organisations had the highest proportion of stakeholders (53%, 8 out of 15) who were unsure of the proposal.

**Figure 19** Requirement to test the DPs at each stage of the Options Appraisal (respondent type by number for question 8)



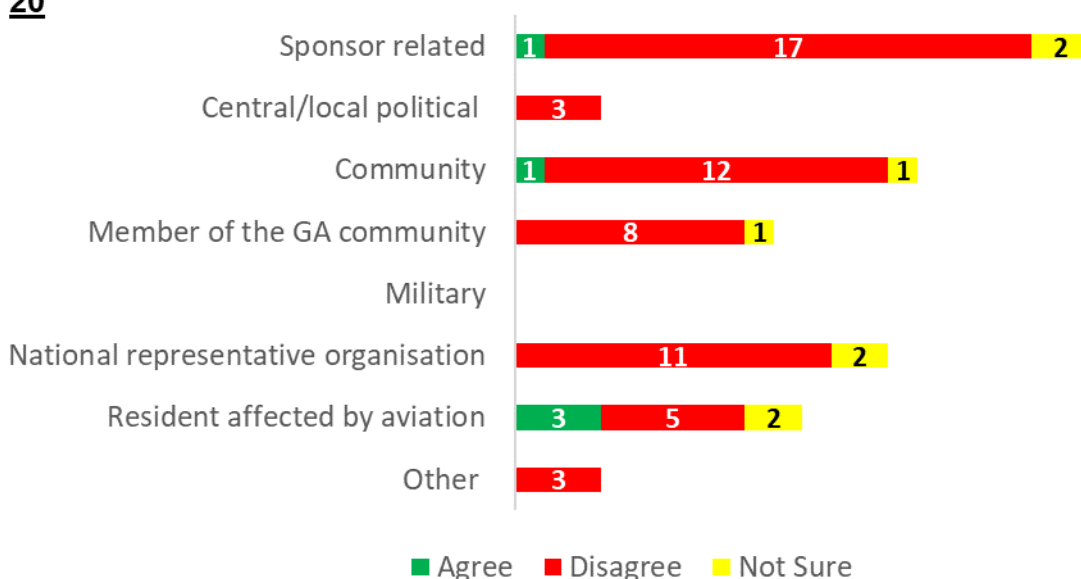
**Figure 19** - Requirement to test the Design Principles at each stage of the Options Appraisal (respondent type by number for question 8)

Option 2: Requirement to test the Design Principles at each stage of the Options Appraisal	Agree	Disagree	Not Sure	Grand Total
Sponsor related	3	10	9	22
Central/local political	5	0	0	5
Community	13	0	2	15
Member of the GA community	5	2	3	10
Military	0	1	0	1
National representative organisation	5	2	8	15
Resident affected by aviation	10	3	1	14
Other	0	2	1	3
<b>Grand Total</b>	<b>41</b>	<b>20</b>	<b>24</b>	<b>85</b>

**Table 19** Question 8 Option 2: Requirement to test the Design Principles at each stage of the Options Appraisal

3.5.6 The chart below (**Figure 20**) shows the number of respondents who disagreed with doing nothing in relation to the high-level proposal regarding Design Principles, Design Options and/or Options Appraisal requirements. All central/local political respondents disagreed, in addition to 89% (8 out of 9) of GA stakeholders, 86% (12 out of 14) of community representatives and 85% (17 out of 20) of respondents who identified as Change Sponsors and national representative organisations. The stakeholder group with the highest proportion of those who agreed with the proposal was residents affected by aviation where 30% (3 out of 10) agreed with leaving Design Principles, Design Options and/or Options Appraisal requirements as they are currently.

**Figure 20** 3. Do Nothing (respondent type by number for question 8)



**Figure 20** - Do Nothing (respondent type by number for question 8)

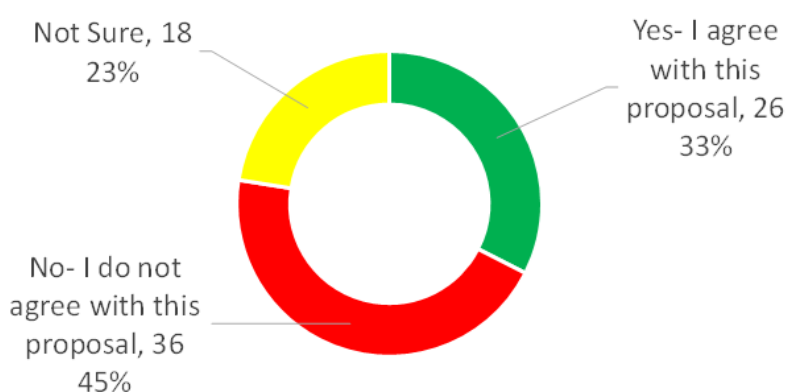
Option 3: Do nothing	Agree	Disagree	Not Sure	Grand Total
Sponsor related	1	17	2	20
Central/local political	0	3	0	3
Community	1	12	1	14
Member of the GA community	0	8	1	9
Military	0	0	0	0
National representative organisation	0	11	2	13
Resident affected by aviation	3	5	2	10
Other	0	3	0	3
<b>Grand Total</b>	<b>5</b>	<b>59</b>	<b>8</b>	<b>72</b>

**Table 20** Question 8 Option 3: Do Nothing

3.5.7 Question 9 asked respondents whether they agreed, disagreed or were not sure on the proposal for removal of requirements (development of Design Principles, Design Options and/or application of the Options Appraisal process) for certain types of Airspace Change Proposals. **Figure 21** below shows that 45% (36 out of 80) of respondents disagreed with the proposal for removal of requirements for certain types of Airspace Change Proposals, while a 33% agreed (26 out of 80) and the remaining 23% (18 out of 80) were not sure.

**Figure 21**

Question 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 (number)



**Figure 21** - Question 9: Please tell us whether, in principle, you agree with the removal of requirements for certain types of Airspace Change Proposal

Please tell us whether, in principle, you agree with the proposal for removal of requirements (development of Design Principles, Design Options and/or application of the Options Appraisals process) for certain types of Airspace Change Proposals.	Yes - I agree with this proposal	No - I do not agree with this proposal	Not Sure	Grand Total
Number	26	36	18	80

Table 21 - Question 9 Review/clarify design principle requirements.

Figure 22

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 (respondent type by number for question 9)

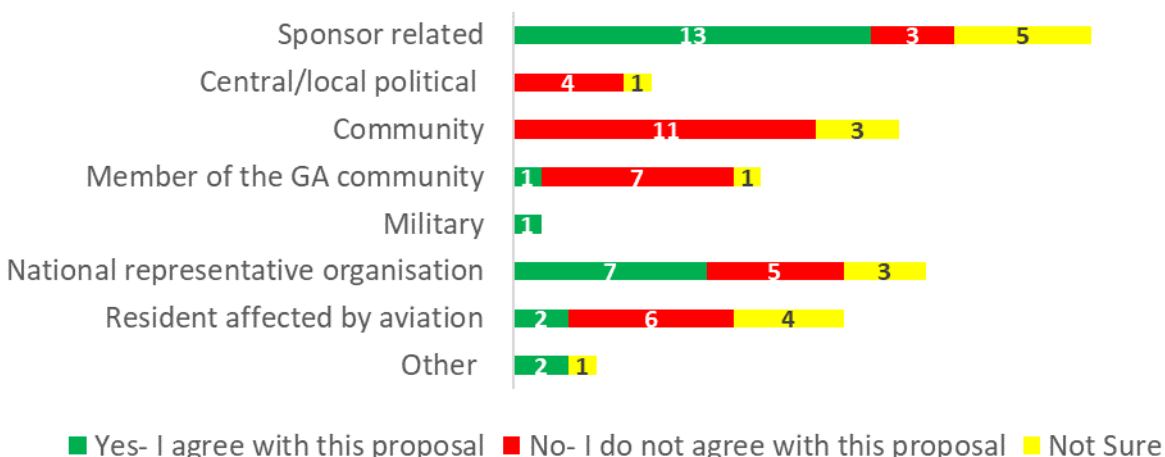


Figure 22 - Please tell us whether, in principle, you agree with the removal of requirements for certain types of Airspace Change Proposal (respondent type by number for question 9)

3.5.8 Figure 22 below shows how different types of stakeholders responded to the options above. The military respondent, stakeholders identifying within the “other” category (66%, 2 out of 3) and Change Sponsors (62%, 13 out of 21) had the highest proportion of respondents who agreed with the proposal. In contrast, central/local political representatives (80%, 4 out of 5), community representatives (79%, 11 out of 14) and members of the GA community (78%, 7 out of 9) disagreed with the option. Change Sponsors had the highest number of respondents who were unsure of the option (24%, 5 out of 21), followed by residents affected by aviation (33%, 4 out of 12).

Please tell us whether, in principle, you agree with the proposal for removal of requirements (development of Design Principles, Design Options and/or application of the Options Appraisals process) for certain types of Airspace Change Proposals.	Yes- I agree with this proposal	No- I do not agree with this proposal	Not Sure	Grand Total
Sponsor related	13	3	5	21
Central/local political	0	4	1	5
Community	0	11	3	14
Member of the GA community	1	7	1	9
Military	1	0	0	1
National representative organisation	7	5	3	15
Resident affected by aviation	2	6	4	12
Other	2	0	1	3
<b>Grand Total</b>	<b>26</b>	<b>36</b>	<b>18</b>	<b>80</b>

*Table 22 Question 9 Review/clarify design principle requirements.*

- 3.5.9 Responses for Question 9 and Question 10 were analysed together as they examined two aspects of the same proposal about the removal of requirements for certain types of Airspace Change Proposals and for which types of Airspace Change Proposals should the removal of requirements apply.
- 3.5.10 Some community stakeholders disagreed with the idea of **removing of some Stage 1 and 2 outputs** (Design Principles, Design Options and or application of the Options Appraisal process). Many felt that removal of such outputs could lead to ill thought out Airspace Change Proposals and decreased scrutiny at crucial formative points in the process. Others were concerned that the removal of such requirements could lead to less opportunities to engage in the process:
- “We are concerned that the removal of requirements will reduce effectiveness of consideration of likely impacts of ACPs and so disadvantage communities over the change sponsor.”*** [Local Government Body](#)
- “Any ACP that could affect safety must go through full stages and scrutiny...It reduces the level of engagement that has to be done and it reduces the analysis and proofs that the airspace change sponsor has to provide.”*** [Local Representative Organisation](#)
- 3.5.11 Stakeholder groups were broadly keen to see **the introduction of mandatory and discretionary Design Principles**. One Change Sponsor-related consultee thought it was a helpful step in establishing early agreement with stakeholders and a mandate for change. Another consultee (representing residents) agreed that there should be some mandatory criteria, but that it should not lead to the inability of local stakeholders to influence criteria.

***“...We think there is scope for the CAA to go further in setting out common design principles that would be expected to apply in most cases and for the sponsor’s process to determine any exceptions or additional factors that are particularly pertinent to the specific change that is proposed.”*** **Change Sponsor – Airports**

***“We do recognise that some criteria should be mandatory but are certainly not in favour of removing the requirement to develop a comprehensive list of Design Options nor of any change which would reduce local stakeholders’ ability to influence the choice of criteria.”*** **Local Representative Organisation**

- 3.5.12 One consultee representing an ANSP suggested a limited number of mandatory Design Principles related to safety, AMS, and environmental impact. Another consultee representing a community noise group wanted to replace a design principle for noise with a Community Noise Objective, currently permitted under the Air Navigation Guidance (2017):

***“In total, there should be no more than 5-7 design principles. Of these, 3 of them should be mandatory and related to Safety, delivering the AMS and Environmental Impact.”***

**Change Sponsor – Air Navigation Service Provider.**

***“Design Principles should flow from the noise objective and are no substitute for an objective....In the absence of a Community Noise Objective, concentration and dispersion and respite cannot be properly assessed. The result is conflicting design principles, which communities can only assume Sponsors will pick and choose to suit their own objectives.”*** **Community Representative - Community Noise Group.**

- 3.5.13 Consultees discussed the advantages and disadvantages of testing Design Principles throughout the Airspace Change Process (Option 2, above). One ANSP felt that it would create extra fatigue on stakeholders and bloat the Airspace Change Process. One consultee representing a community noise group reacted positively to Option 2, they said:

***“[Organisation Name] agree that this would increase transparency and ensure that sponsors are testing their DPs robustly. We suggest that this should be strengthened by ensuring that ALL DPs are tested at each stage.”***

**Community Noise Group.**

- 3.5.14 Different stakeholders voiced their opinion on which **types/ levels of Airspace Change Proposal the removal of requirements should apply to (leading to scaling of the Airspace Change Process)**. Some wanted to see removal of requirements for the newly proposed Levels 3 and 0 or Temporary Airspace Change Proposals. Others stated they did not want to see removal of requirements for Level 1 and 2 Airspace Change Proposals:



***“Level 1 and Level 2 changes should not only have to retain the development of Design Principles, formation of Design Options and a clear and an explicable options appraisal process, they should have to include a full Base Case analysis and justification for the change at Stage 1.”*** **Local Representative Organisation.**

- 3.5.15 Various Change Sponsor-related consultees made cases for removal of requirements from their types of Airspace Change Proposals. Consultees representing airports and ANSPs expressed support for removal of requirements for free route airspace, Performance Based Navigation (PBN), changes over water and Airspace Change Proposals which look at establishing Required Navigation Performance Instrument Approach Procedures (RNP IAPs) without an approach control (Part 1C). One GA user agreed:

***“It must be easier to establish GPS approaches at smaller airfields”*** **Member of the General Aviation Community.**

- 3.5.16 A military consultee wanted to see the removal of design principle development for Airspace Change Proposals intended to meet a specific operational requirement where airspace dimensions and location are relatively inflexible, resulting in only one preferred option for the design being realistic. Conversely, a consultee representing the space industry stated that the launches needed greater flexibility in Airspace Change Process because of the short amount of time they were used for:

***“...They require more flexibility and are usually activated for a shorter lifespan...Integration of more flexible ACP requirements would be beneficial to the sponsor and, eventually, to a space traffic management.”*** **Change Sponsor – Space industry.**

- 3.5.17 Some consultees discussed **Airspace Change Proposals inside and outside of controlled airspace**. One GA consultee suggested that Airspace Change Proposals occurring inside CAS should always have Options Appraisals attached to them and that this was somewhere the CAA should take a robust role early in the process. One argued that for those Airspace Change Proposals which looked at instrument approaches outside of Procedures for Air Navigation Services-Aircraft Operations (PANS-OPS)<sup>10</sup>, Design Principles may be make the process overly complicated:

***“...Instrument approaches outside of controlled airspace must primarily be designed in accordance with PANS-OPS, the concept of Design Principles is often unnecessarily complex for such ACPs. In reality there will several***

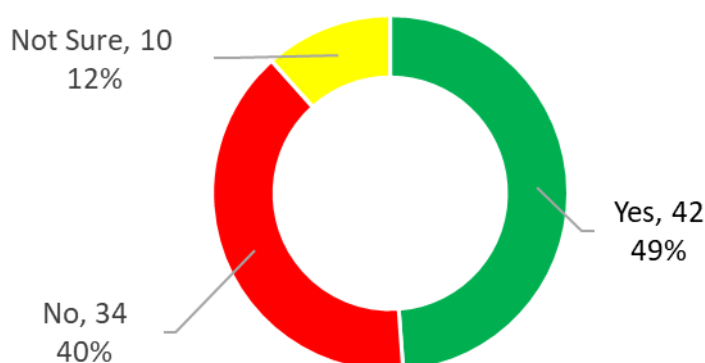
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<sup>10</sup> PANS-OPS are rules for designing instrument approach, holding and departure procedures.

***viable and compliant options, with strengths and weaknesses.” National Representative Organisation.***

3.5.18 As part of the consultation survey, respondents were asked for their views on the high-level proposal to remove the requirement to develop a ‘comprehensive list’ of Design Options which includes ‘radical options’. **Figure 23** below shows that 49% (42 out of 86) of respondents agreed with the proposal to remove the requirement to develop a ‘comprehensive list’ of Design Options (including ‘radical options’), while a good proportion (40%, 34 out of 86) did not. 12% of respondents (10 out of 86) were unsure about this proposal.

**Figure 23** Question 11 Should we remove the requirement to develop a 'comprehensive list' of design options (including 'radical options')?



**Figure 23** - Question 11: Should we remove the requirement to develop a 'comprehensive list' of Design Options (including 'radical options')?

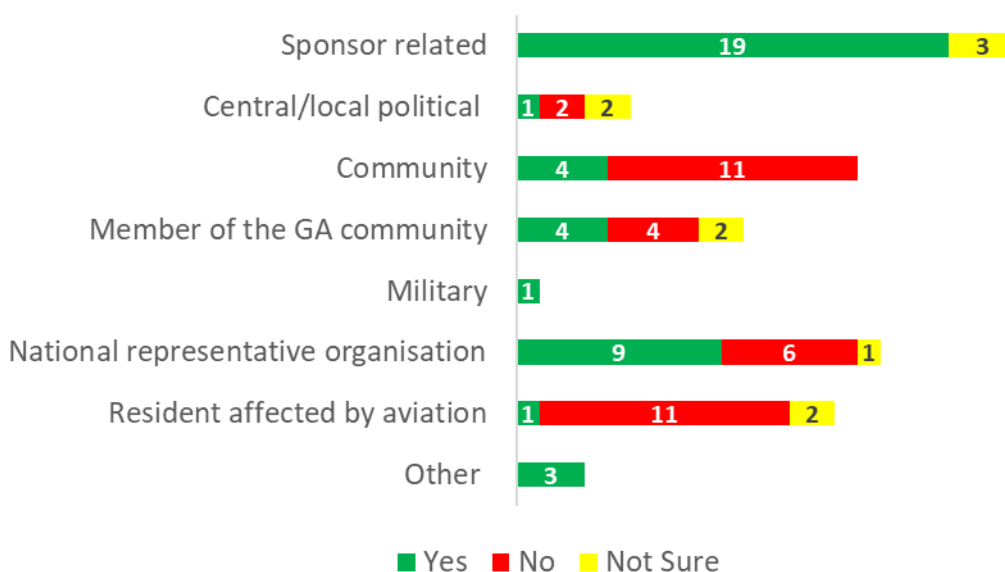
Should we remove the requirement to develop a 'comprehensive list' of Design Options (including 'radical options')?	Yes	No	Not Sure	Grand Total
<b>Number</b>	42	34	10	86

**Table 23** Question 11 Remove requirement to develop a comprehensive list of Design Options.

3.5.19 The chart below (**Figure 24**) shows how different types of stakeholders responded to the options above. 86% (19 out of 22) of respondents who identified as Change Sponsors agreed with the proposal, while a small number did not (14%, 3 out of

22)). A good proportion of national representative organisations also agreed (56%, 9 out of 16). Residents affected by aviation had the lowest proportion of respondents who agreed with this proposal (7%, 1 out of 14), followed by central/local political representatives (20%, 1 out of 5) and community representatives (27%, 4 out of 15).

**Figure 24** Should we remove the requirement to develop a 'comprehensive list' of design options (including 'radical options')? (Respondent type by number for question 11)



**Figure 24** - Should we remove the requirement to develop a 'comprehensive list' of Design Options (including 'radical options')? (Respondent type by number for question 11)

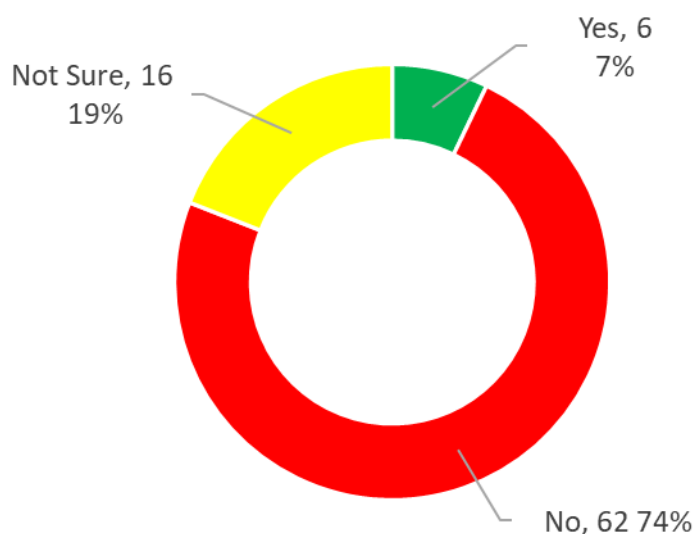
Should we remove the requirement to develop a 'comprehensive list' of Design Options (including 'radical options')?	Yes	No	Not Sure	Grand Total
<b>Sponsor related</b>	19	0	3	22
<b>Central/local political</b>	1	2	2	5
<b>Community</b>	4	11	0	15
<b>Member of the GA community</b>	4	4	2	10
<b>Military</b>	1	0	0	1
<b>National representative organisation</b>	9	6	1	16
<b>Resident affected by aviation</b>	1	11	2	14
<b>Other</b>	3	0	0	3
<b>Grand Total</b>	42	34	10	86

**Table 24** - Question 11 Remove requirement to develop a comprehensive list of Design Options.

3.5.20 The consultation survey sought feedback on the proposal to review whether the stakeholder engagement requirements in Stage 2 (Develop & Assess) on Design

Options should be retained. The question in the survey that this proposal relates to is Question 12. **Figure 25** below shows that most respondents (74%, 62 out of 84) disagreed with the proposal to remove the requirement for stakeholder engagement in Stage 2 on Design Options. 19% (16 out of 84) were unsure about this proposal, while a small number (7%, 6 out of 84) agreed.

**Figure 25** Question 12 Should we remove the requirement for engagement in Stage 2?



**Figure 25** - Question 12: Should we remove the requirement for engagement in Stage 2?

Should we remove the requirement for engagement in Stage 2?	Yes	No	Not Sure	Grand Total
Number	6	62	16	84

**Table 25** Question 12 Remove requirement for engagement in Stage 2

3.5.21 The chart below (**Figure 26**) shows that community (15) and central/local political representatives (5) had the highest proportion of stakeholders who disagreed with the removal of stakeholder engagement in Stage 2 on Design Options, with all stakeholders who responded in these groups disagreeing. A good proportion of Change Sponsors (62%, 13 out of 21) also disagreed, but 14% (3 out of 21) agreed with this proposal, as did the military respondent. National representative organisations had the highest number of respondents who were not sure about this proposal (38%, 6 out of 16).

**Figure 26**

Should we remove the requirement for engagement in Stage 2?  
(Respondent type by number for question 12)



**Figure 26** - Should we remove the requirement for engagement in Stage 2 (Respondent type by number for question 12)

Should we remove the requirement for engagement in Stage 2?	Yes	No	Not Sure	Grand Total
<b>Sponsor related</b>	3	13	5	21
<b>Central/local political</b>	0	5	0	5
<b>Community</b>	0	15	0	15
<b>Member of the GA community</b>	0	7	2	9
<b>Military</b>	1	0	0	1
<b>National representative organisation</b>	0	10	6	16
<b>Resident affected by aviation</b>	0	12	2	14
<b>Other</b>	2	0	1	3
<b>Grand Total</b>	6	62	16	84

**Table 26** - Question 12 Remove requirement for engagement in Stage 2

3.5.22 Qualitative data from the survey (Question 13) revealed further insight into why respondents responded to the questions on proposals to remove/review the requirement for a comprehensive list of options and engagement in stage 2 in the manner they did.

- 3.5.23 Stakeholders discussed **the role of a “comprehensive list”** of options and the purpose and outcome of **radical options**. Some Change Sponsor-related stakeholders wanted to see the requirement for a comprehensive list of options removed. They primarily saw this requirement as costly in situations where they knew some options would not progress further. Radical options were perceived as unrealistic and leading stakeholders to unrealistic expectations and worry about what may or may not be taken forward:

***“The proposal for developing a “radical” options approach is not supported. At [Airport Name] we simply do not believe this can be achieved. Such proposals would amount to needless anxiety for communities...”*** **Change Sponsor – Airport.**

- 3.5.24 The case for the retention of comprehensive lists and radical options was made, too. One Change Sponsor-related consultancy reflected that radical options should be retained for when such an option would serve as a compromise. One community-based consultee reflected that removal of the requirement for a comprehensive list of options and radical options would reduce creative thinking in the design process and be a missed opportunity to consider options that would otherwise be lost:

***“People will be more engaged if they have a chance to raise perspectives or options which may be considered radical, but which may involve worthwhile approaches which the sponsor would not necessarily have considered.”*** **Community noise group.**

- 3.5.25 Both stakeholders representing communities and Change Sponsors supported the idea of **keeping engagement in Stage 2 of the Airspace Change Process**. Airports saw the value in keeping engagement to understand impacts throughout the stage but wanted to see clarity on engagement requirements. One stakeholder from a national representative organisation noted the role of engagement in transparency of the Airspace Change Process and in saving work later:

***“Removal of engagement requirements is not good practice for open and transparent communication principles and could lead to wasted work or submissions that stakeholders are not happy with committing to.”*** **National Representative Organisation.**

***“[Airport] believes it is important to discuss the options with stakeholders at this point. Stakeholders are able to provide the local knowledge and provide context around the designs.”*** **Change Sponsor – Airport.**

***“Clarity and refinement of engagement requirements in Stage 2 would enhance the process for both sponsors and community stakeholders, and better manage the expectations of stakeholders at each stage of engagement.”*** **Change Sponsor – Airport.**

- 3.5.26 Community stakeholders recognised the value in involving the public early on, so they are aware and understand the proposals early on in the Airspace Change Process. They also mentioned that options should also consider the impact on biodiversity, physical and mental health:

***“My family and I are opposed to any attempt at reduce the amount of community engagement. Engagement...allows communities impacted by the ACP to have an input into the process, raise concerns, ask questions, and have an opportunity to learn about the detail of the ACP... The impact assessment should also be extended to include issues such as tranquillity, biodiversity, physical and mental health.” Resident affected by aviation.***

### Checklists of requirements for Change Sponsors proposals

- 3.5.27 An open text question (Question 14) asked consultees for their views on proposals to introduce a checklist of requirements for Change Sponsors separated by regulatory areas for each stage of the Airspace Change Process. Key themes which arose from the feedback include process effectiveness, Change Sponsor resource, clarification, compliance in terms of governance and transparency.
- 3.5.28 There was a lot of support for the provision of checklists for Change Sponsors, with some stakeholders saying that this would provide transparency, clarity, increase process effectiveness and ensure that all regulatory requirements are followed, especially for Change Sponsors who are unfamiliar with Airspace Change Process.

***“This will likely result in a more efficient and consistent process overall.” Change Sponsor – Unmanned Aerial Systems (UAS) / Remotely Piloted Aircraft Systems (RPAS).***

***“Sounds very helpful, especially for ACP sponsors who are unfamiliar with the process. Even large airports and Specialists struggle to understand the current complexity” Change Sponsor – Unmanned Aerial Systems (UAS) / Remotely Piloted Aircraft Systems (RPAS).***

- 3.5.29 Another Change Sponsor who agreed that this would be a helpful tool suggested that these should be developed in collaboration with Change Sponsors, while a different Change Sponsor thought that the introduction of checklists would be useful but did not wish for this to cause any additional workload for Change Sponsors.

***“Sounds useful. If taken up these should be developed with sponsors to ensure useful content” Change Sponsor – Airport.***

***“We agree that the introduction of checklists would assist ACP sponsors as long as there was no additional workload on the sponsors.” Change Sponsor – ANSP/Airports.***

- 3.5.30 A Change Sponsor from the space industry said that provision of checklists would benefit Change Sponsors external to the UK.

***“It would be beneficial, especially for sponsors external to the UK and not used to the UK regulations or activities.”*** [Change Sponsor – Space industry.](#)

- 3.5.31 Compliance with the Airspace Change Process was raised by a wide range of stakeholders who expressed that a checklist of requirements for Change Sponsors will provide clarity for all parties on the regulatory requirements which must be met. A resident affected by aviation felt that having sight of the checklist of requirements that will be assessed at each gateway would ensure stakeholders are aware of what they should be consulted on.

***“Clarity on governance points that must be met is to be welcomed... It should be helpful to the AC sponsors and would give some comfort to communities that regulatory standards will be met.”*** [Local Representative Organisation.](#)

***“A ‘checklist’ of those requirements that are assessed at each stage of the CAA’s decision-making process would help ensure stakeholders are aware of what they should be consulted on.”*** [Resident affected by aviation.](#)

***“[Military stakeholder] supports the proposal to provide process checklists for each stage. If sponsors had visibility of assessment criteria, it would be much easier to ensure that the submissions meet the requirements.”*** [Military](#)

- 3.5.32 Several stakeholders were concerned that the checklist could be seen as a ‘tick box’ exercise to advance airspace changes.

***“A checklist may be a good solution for the sponsor/ airport, but it will be seen as a ‘tick box’ exercise for aviation to push through airspace change while ignoring the impact it has on communities...”*** [Community noise group.](#)

***“The introduction of a checklist is fine as long as it is not mandated and is a framework for a self-check criterion which is met and not just a tick box exercise.”*** [Member of General Aviation community.](#)

- 3.5.33 A national representative organisation sought clarification that if implemented, the provision of checklists would be in addition to the full Airspace Change Process requirements.

***“The provision of checklists is agreed in principle. However, checklists cannot become a replacement for full and due process in accordance with the requirements of the full version of the CAP 1616.”*** [National Representative Organisation.](#)

- 3.5.34 A central/local political representative agreed with the proposal, voicing that checklists would help to ensure that environmental issues are not overlooked.



***“I agree this would be useful and ensures environmental issues are not overlooked.”*** Councillor or MP.

- 3.5.35 One Change Sponsor said they would welcome checklists to detail which checklist items apply to the different Airspace Change Proposal levels or types of Airspace Change Proposals, so that they are also applicable for Airspace Change Proposals that can be scaled.

***“It would be helpful if checklists were tailored for ACPs level / scale (it should be clear what items apply to which ACP level).”*** Change Sponsor – ANSP.

- 3.5.36 One Change Sponsor felt that they should include their completed checklist within their submission, with a ratified version to be published by the CAA post completion of the gateway assessment.

***“The completed checklists should be included with the submission, and a ratified version published by the CAA post gateway completion.”*** Change Sponsor – ANSP.

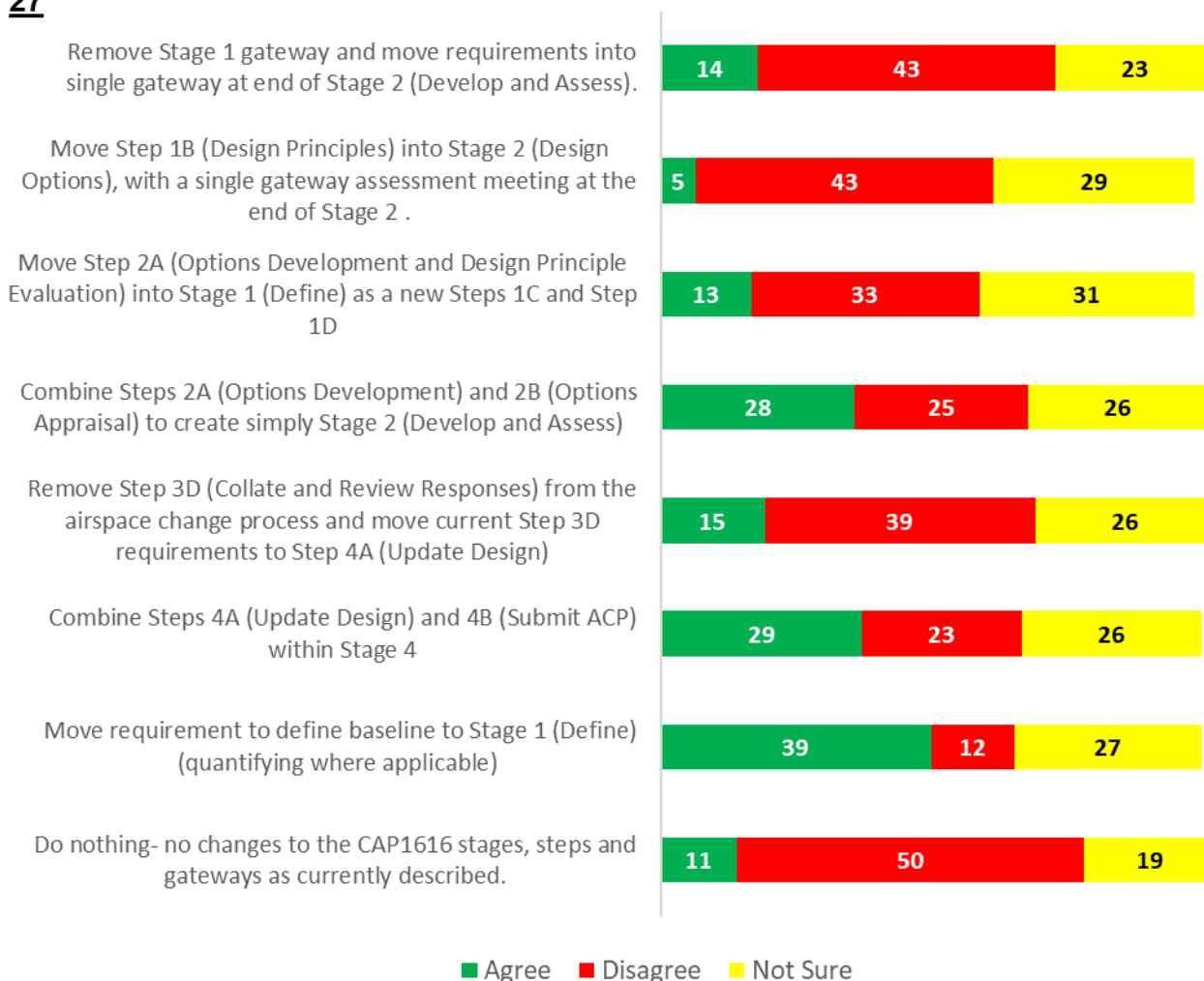
- 3.5.37 There was support from Change Sponsors for the inclusion of these checklists within the new version of CAP 1616 in the appropriate sections. One Change Sponsor suggested they could be placed at the start of each chapter, in addition to the flowcharts.

***“Checklists should be provided for each CAP 1616 stage and contained within the appropriate section of the document...”*** Change Sponsor – Airspace change consultancy.

***“These checklists could be placed alongside the stage diagrams we suggest should be at the start and not the end of each chapter.”*** Change Sponsor – Approved Procedure Design Organisation.

- 3.5.38 The consultation survey sought feedback from stakeholders on options relating to how the Airspace Change Proposal Stages, Steps and Gateways could be modified. Questions 15 and 16 of the survey asked respondents whether they agreed, disagreed or were not sure about the eight options listed in **Figure 27** below.

**Figure 27** Questions 15 & 16 Modification of ACP stages, steps and gateways



**Figure 27 - Questions 15&16: Modifications of Airspace Change Proposal stages, steps and gateways**

3.5.39 **Figure 27** (above) shows that the seventh option (Move requirement to define baseline to Stage 1) was the most popular option with respondents overall, with 50% (39 out of 78) supporting this option. This option also had the lowest proportion of respondents who disagreed (15%, 12 out of 78). Option 4 (Combine Steps 2A and 2B to create simply Stage 2) and Option 6 (Combine Steps 4A and 4B within Stage 4) were the other two options where the proportions of respondents who agreed were higher than proportions that disagreed or were not sure. 35% and 37% of respondents were in favour of these options respectively. However, around a third both disagreed and were unsure about these two options.

3.5.40 The option that received the highest proportion of disagreement from stakeholders was the 'do nothing' option, with almost 63%, 50 out of 80 disagreeing. This was followed by options 1 (Remove Stage 1 gateway and move requirements into single gateway at end of Stage 2) and 2 (Move Step 1B into Stage 2, with a single gateway assessment meeting at the end of Stage 2) both of which over half of

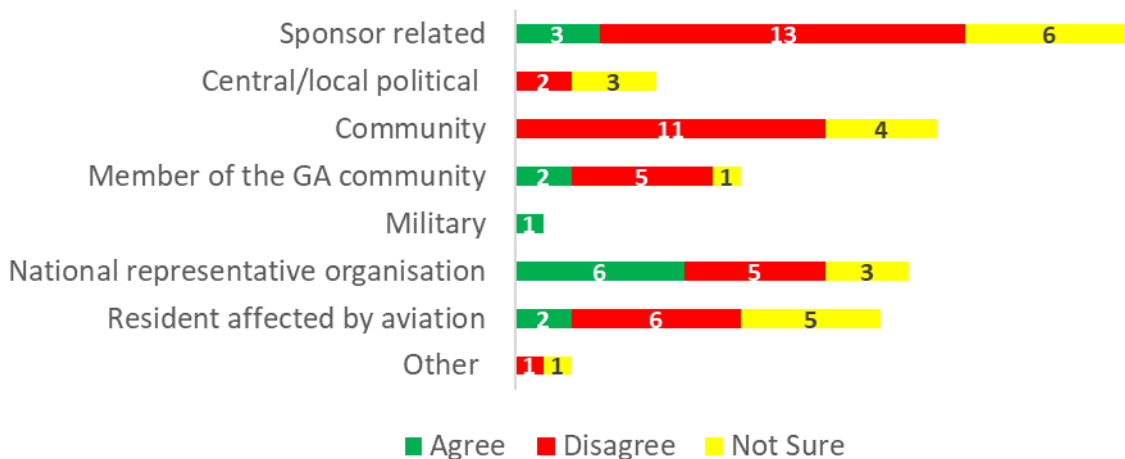
respondents disagreed with. Option 2 had the least agreement overall with just 6% (5 out of 77) of respondents in favour. Option 3 (Move Step 2A into Stage 1 as a new Steps 1C and Step 1D) and Option 5 (Remove Step 3D from the Airspace Change Process and move current Step 3D requirements to Step 4A) had a similar split between responses with 17% and 19% respectively agreeing, and 43% (33 out of 77) and 49% (39 out of 80) disagreeing with these options respectively.

<b>Please indicate if you agree, disagree or are not sure about the options below</b>	<b>Agree</b>	<b>Disagree</b>	<b>Not Sure</b>	<b>Grand Total</b>
<b>Remove Stage 1 gateway and move requirements into single gateway at end of Stage 2 (Develop and Assess)</b>	14	43	23	80
<b>Move Step 1B (Design Principles) into Stage 2 (Design Options), with a single gateway assessment meeting at the end of Stage 2</b>	5	43	29	77
<b>Move Step 2A (Options Development and Design Principle Evaluation) into Stage 1 (Define) as a new Steps 1C and Step 1D</b>	13	33	31	77
<b>Combine Steps 2A (Options Development) and 2B (Options Appraisal) to create simply Stage 2 (Develop and Assess)</b>	28	25	26	79
<b>Remove Step 3D (Collate and Review Responses) from the Airspace Change Process and move current Step 3D requirements to Step 4A (Update Design)</b>	15	39	26	80
<b>Combine Steps 4A (Update Design) and 4B (Submit Airspace Change Proposal) within Stage 4</b>	29	23	26	78
<b>Move requirement to define baseline to Stage 1 (Define) (quantifying where applicable)</b>	39	12	27	78
<b>Do nothing - no changes to the CAP 1616 stages, steps and gateways as currently described.</b>	11	50	19	80

*Table 27 Questions 15 &16: Modification of Airspace Change Proposal stages, steps, and gateways*

3.5.41 The chart below (**Figure 28**) shows how different types of stakeholders responded to Option 1. 73%, 11 out of 15 of community representatives disagreed with the option to remove the Stage 1 gateway and move requirements into a single gateway at the end of Stage 2. For GA stakeholders 63% (5 out of 8 disagreed and 59% (13 out of 22) of Change Sponsors also disagreed. The military respondent agreed with the option, and national representative organisations had the second highest proportion of respondents who agreed (43%, 6 out of 14)).

**Figure 28** 1. Remove Stage 1 gateway and move requirements into single gateway at end of Stage 2 (Develop and Assess) (respondent type by number for question 15)



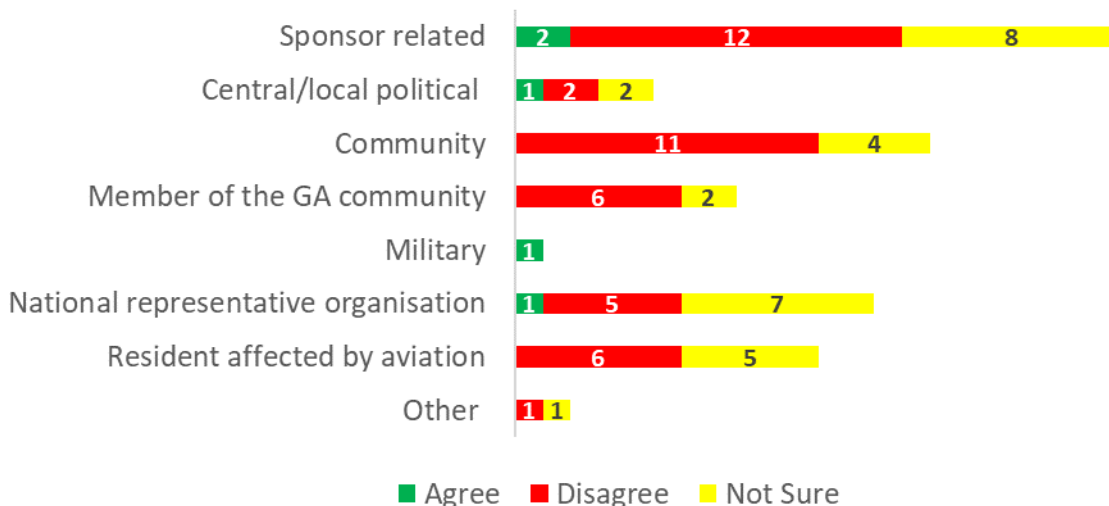
**Figure 28** - Questions 15 &16: Option 1: Remove Stage 1 gateway and move requirements into single gateway at end of Stage 2

Option 1: Remove Stage 1 gateway and move requirements into single gateway at end of Stage 2	Agree	Disagree	Not Sure	Grand Total
<b>Sponsor related</b>	3	13	6	22
<b>Central/local political</b>	0	2	3	5
<b>Community</b>	0	11	4	15
<b>Member of the GA community</b>	2	5	1	8
<b>Military</b>	1	0	0	1
<b>National representative organisation</b>	6	5	3	14
<b>Resident affected by aviation</b>	2	6	5	13
<b>Other</b>	0	1	1	2
<b>Grand Total</b>	14	43	23	80

**Table 28** - Questions 15 &16: Option 1: Remove Stage 1 gateway and move requirements into single gateway at end of Stage 2

3.5.42 The chart below (**Figure 29**) shows how different types of stakeholders responded to Option 2. GA stakeholders had the highest proportion of those who disagreed with the option (75%, 6 out of 8), followed by community representatives (73%, 11 out of 15). Over half of Change Sponsors (55%, 12 out of 22) and residents affected by aviation (55%, 6 out of 11) also disagreed with the proposal. National representative organisations had the highest proportion of stakeholders who were unsure of the option (54%, 7 out of 13).

**Figure 29** 2. Move Step 1B (Design Principles) into Stage 2 (Design Options), with a single gateway assessment meeting at the end of Stage 2 (respondent type by number for question 15)



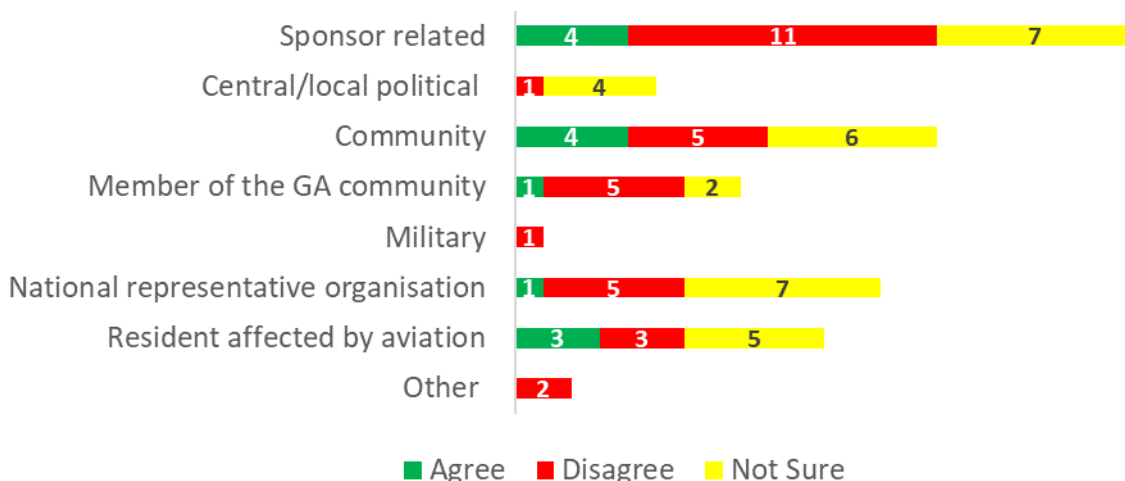
**Figure 29** – Questions 15 &16: Option 2: Move Step 1B into Stage 2, with a single gateway assessment meeting at the end of Stage 2

Option 2: Move Step 1B (Design Principles) into Stage 2 (Design Options), with a single gateway assessment meeting at the end of Stage 2	Agree	Disagree	Not Sure	Grand Total
<b>Sponsor related</b>	2	12	8	22
<b>Central/local political</b>	1	2	2	5
<b>Community</b>	0	11	4	15
<b>Member of the GA community</b>	0	6	2	8
<b>Military</b>	1	0	0	1
<b>National representative organisation</b>	1	5	7	13
<b>Resident affected by aviation</b>	0	6	5	11
<b>Other</b>	0	1	1	2
<b>Grand Total</b>	5	43	29	77

**Table 29** - Questions 15 &16: Option 2: Move Step 1B into Stage 2, with a single gateway assessment meeting at the end of Stage 2

3.5.43 The chart below (**Figure 30**) shows how different types of stakeholders responded to Option 3. The military respondent disagreed with this option, in addition to the two respondents who identified as 'other'. Also 63% (5 out of 8) of respondents who identified as members of the GA community disagreed. Residents affected by aviation had the highest proportion of respondents who agreed with this option, with 27% (3 out of 11) agreeing.

**Figure 30** 3. Move Step 2A (Options Development and Design Principle Evaluation) into Stage 1 (Define) as a new Steps 1C and Step 1D (respondent type by number for question 15)



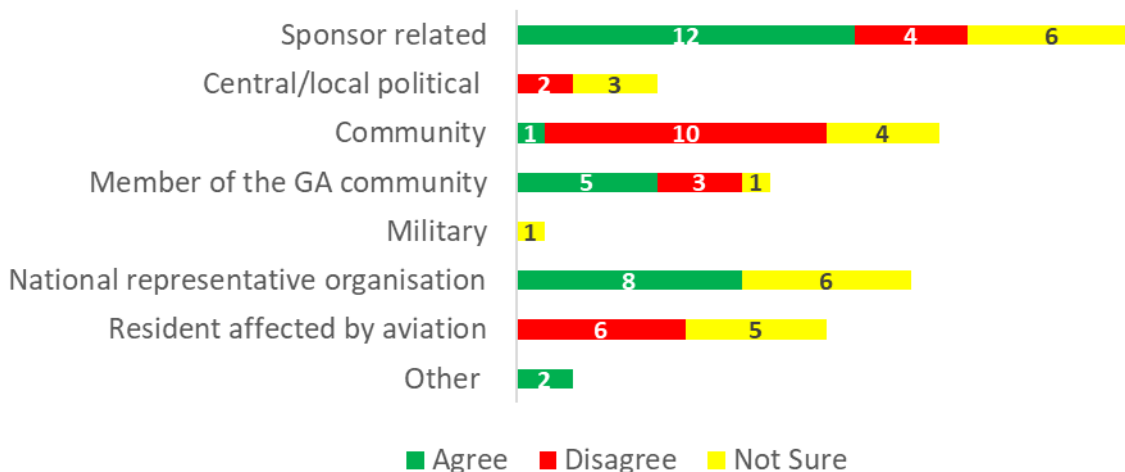
**Figure 30** - Questions 15&16: Option 3: Move Step 2A into Stage 1 as a new Steps 1C and Step 1D.

Option 3: Move Step 2A (Options Development and Design Principle Evaluation) into Stage 1 (Define) as a new Steps 1C and Step 1D	Agree	Disagree	Not Sure	Grand Total
Sponsor related	4	11	7	22
Central/local political	0	1	4	5
Community	4	5	6	15
Member of the GA community	1	5	2	8
Military	0	1	0	1
National representative organisation	1	5	7	13
Resident affected by aviation	3	3	5	11
Other	0	2	0	2
<b>Grand Total</b>	<b>13</b>	<b>33</b>	<b>31</b>	<b>77</b>

**Table 30** - Questions 15&16: Option 3: Move Step 2A into Stage 1 as a new Steps 1C and Step 1D.

3.5.44 The chart below (**Figure 31**) shows how different types of stakeholders responded to Option 4. Overall, there was a fairly even split between whether respondents agreed, disagreed or were not sure about this option. However, of the 28 respondents who agreed, 12 of these were Change Sponsors (43%) and 8 were national representative organisations (29%). Community representatives had the highest proportion of respondents who disagreed with this option, with 67% (10 out of 15) disagreeing. 55%, (6 out of 11) of residents affected by aviation disagreed with this option, while the remaining 45% (5 out of 11) were unsure.

**Figure 31** 4. Combine Steps 2A (Options Development) and 2B (Options Appraisal) to create simply Stage 2 (Develop and Assess)  
(respondent type by number for question 15)



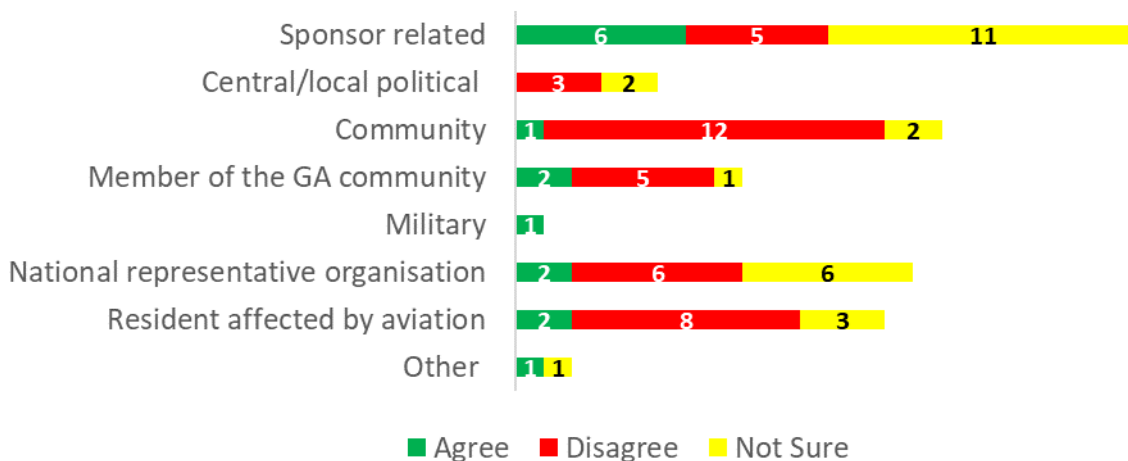
**Figure 31** - Questions 15 &16: Option 4: Combine Steps 2A and 2B to create simply Stage 2

Option 4: Combine Steps 2A (Options Development) and 2B (Options Appraisal) to create simply Stage 2 (Develop and Assess)	Agree	Disagree	Not Sure	Grand Total
Sponsor related	12	4	6	22
Central/local political	0	2	3	5
Community	1	10	4	15
Member of the GA community	5	3	1	9
Military	0	0	1	1
National representative organisation	8	0	6	14
Resident affected by aviation	0	6	5	11
Other	2	0	0	2
<b>Grand Total</b>	<b>28</b>	<b>25</b>	<b>26</b>	<b>79</b>

**Table 31** - Questions 15 &16: Option 4: Combine Steps 2A and 2B to create simply Stage 2

3.5.45 The chart below (**Figure 32**) shows how different types of stakeholders responded to Option 5. The 15 respondents who agreed with this option included the military respondent, 6 Change Sponsors and a small number of individuals from each stakeholder group except for central/local political representatives. Community representatives had the largest proportion who disagreed with this option (80%, 12 out of 15), followed by 63% (5 out of 8) of GA stakeholders and residents affected by aviation (62%, 8 out of 13).

**Figure 32** 5. Remove Step 3D (Collate and Review Responses) from the airspace change process and move current Step 3D requirements to Step 4A (Update Design) (respondent type by number for question 16)



**Figure 32** - Questions 15 & 16: Option 5: Remove Step 3D from the Airspace Change Process and move current Step 3D requirements to Step 4A.

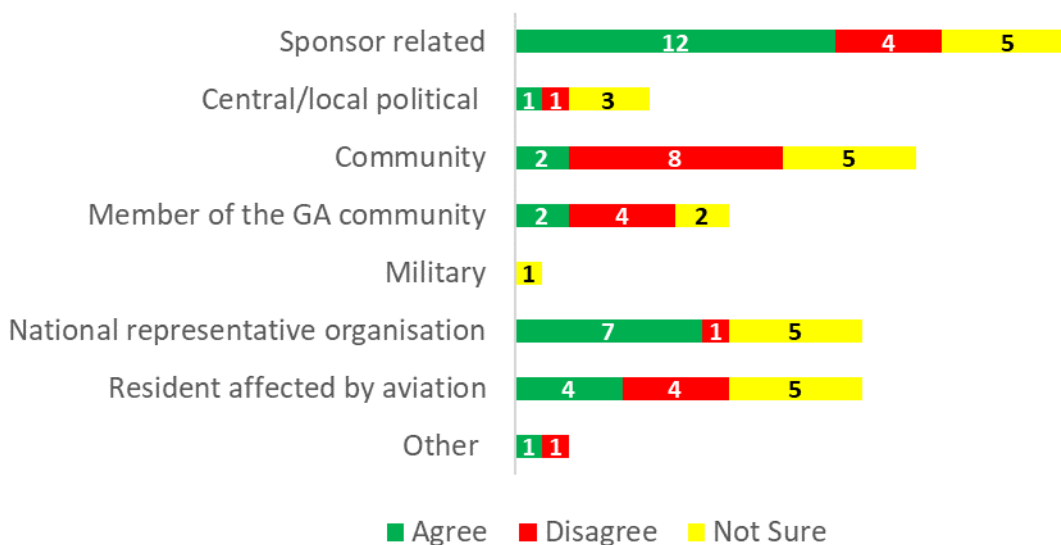
Option 5: Remove Step 3D from the Airspace Change Process and move current Step 3D requirements to Step 4A	Agree	Disagree	Not Sure	Grand Total
<b>Sponsor related</b>	6	5	11	22
<b>Central/local political</b>	0	3	2	5
<b>Community</b>	1	12	2	15
<b>Member of the GA community</b>	2	5	1	8
<b>Military</b>	1	0	0	1
<b>National representative organisation</b>	2	6	6	14
<b>Resident affected by aviation</b>	2	8	3	13
<b>Other</b>	1	0	1	2
<b>Grand Total</b>	15	39	26	80

**Table 32** - Questions 15 & 16: Option 5: Remove Step 3D from the Airspace Change Process and move current Step 3D requirements to Step 4A.

3.5.46 The chart below (**Figure 33**) shows how different types of stakeholders responded to Option 6. Although there were mixed views across the stakeholder groups, over half of respondents who identified as Change Sponsors (57%, 12 out of 21) and national representative organisations (54%, 7 out of 13) agreed with this option. In contrast, over half of the community stakeholders (53%, 8 out of 15) disagreed. Other than the military stakeholder being unsure, central/local political stakeholders had the highest proportion of those who were not sure about the option (60%, 3 out of 5).



**Figure 33** 6. Combine Steps 4A (Update Design) and 4B (Submit ACP) within Stage 4 (respondent type by number for question 16)



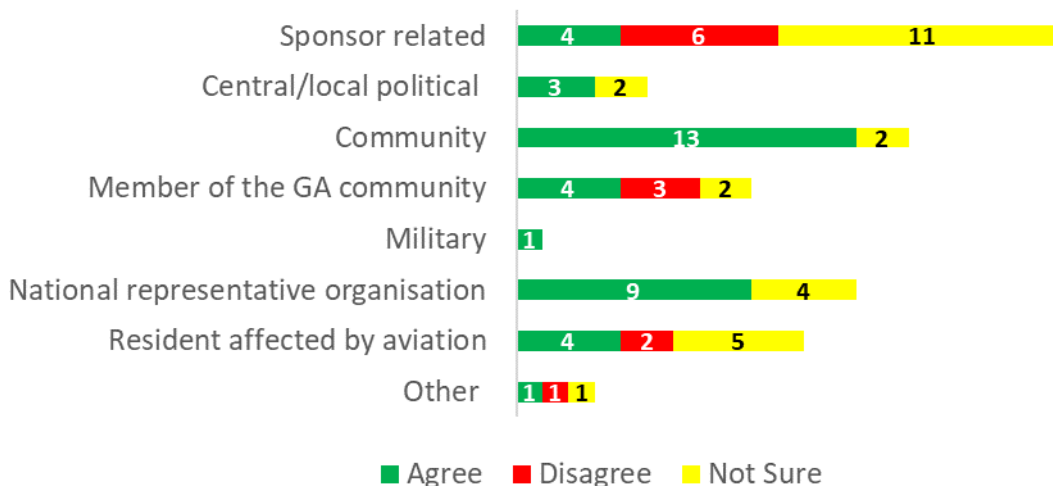
**Figure 33** - Questions 15 & 16: Option 6: Combine Steps 4A and 4B within Stage 4

Option 6: Combine Steps 4A (Update Design) and 4B (Submit Airspace Change Proposal) within Stage 4	Agree	Disagree	Not Sure	Grand Total
<b>Sponsor related</b>	12	4	5	21
<b>Central/local political</b>	1	1	3	5
<b>Community</b>	2	8	5	15
<b>Member of the GA community</b>	2	4	2	8
<b>Military</b>	0	0	1	1
<b>National representative organisation</b>	7	1	5	13
<b>Resident affected by aviation</b>	4	4	5	13
<b>Other</b>	1	1	0	2
<b>Grand Total</b>	29	23	26	78

**Table 33** - Questions 15 & 16: Option 6: Combine Steps 4A and 4B within Stage 4

3.5.47 The chart below (**Figure 34**) shows how different types of stakeholders responded to Option 7. Other than the military stakeholder who agreed, community representatives had the highest percentage who agreed with this option (87%, 13 out of 15), followed by national representative organisations (69%, 9 out of 13). Just 19% (4 out of 21) of Change Sponsors agreed with this option, with over half (52%, 11 out of 21) being unsure.

**Figure 34** 7. Move requirement to define baseline to Stage 1 (Define) (quantifying where applicable) (respondent type by number for question 16)



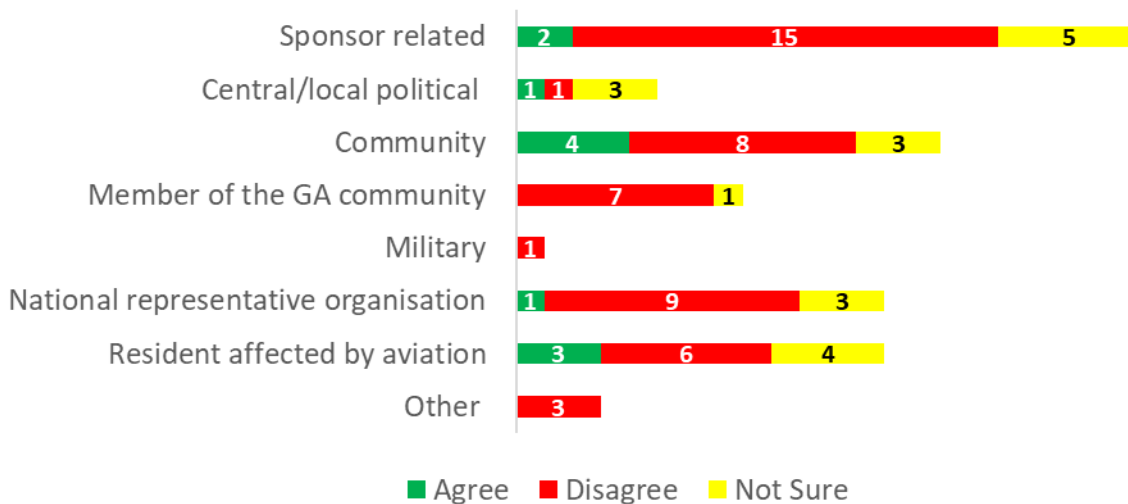
**Figure 34** - Questions 15 &16: Option 7: Move requirement to define baseline to Stage 1

Option 7: Move requirement to define baseline to Stage 1 (Define) (quantifying where applicable)	Agree	Disagree	Not Sure	Grand Total
Sponsor related	4	6	11	21
Central/local political	3	0	2	5
Community	13	0	2	15
Member of the GA community	4	3	2	9
Military	1	0	0	1
National representative organisation	9	0	4	13
Resident affected by aviation	4	2	5	11
Other	1	1	1	3
<b>Grand Total</b>	<b>39</b>	<b>12</b>	<b>27</b>	<b>78</b>

**Table 34** - Questions 15 &16: Option 7: Move requirement to define baseline to Stage 1

3.5.48 The chart below (**Figure 35**) shows how different types of stakeholders responded to Option 8 – ‘do nothing’. There were representatives from every stakeholder group who disagreed with this option. 88% (7 out of 8) of GA stakeholders disagreed, in addition to 69% (9 out of 13) of national representative organisations and 68% (15 out of 22) of Change Sponsors. Around half of community stakeholders (53%, 8 out of 15) and residents affected by aviation (46%, 6 out of 13) also disagreed. Of the 11 respondents who agreed with doing nothing, 4 of these were community stakeholders and 3 were residents affected by aviation.

**Figure 35** 8. Do nothing - no changes to the CAP 1616 stages, steps and gateways as currently described (respondent type by number for question 16)



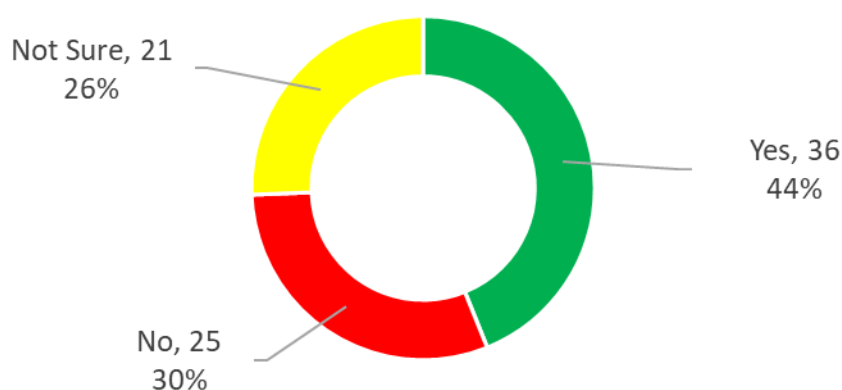
**Figure 35** - Questions 15 & 16: Option 8: Do nothing - no changes to the CAP 1616 stages, steps and gateways as currently described.

Option 8: Do nothing - no changes to the CAP 1616 stages, steps and gateways as currently described.	Agree	Disagree	Not Sure	Grand Total
<b>Sponsor related</b>	2	15	5	22
<b>Central/local political</b>	1	1	3	5
<b>Community</b>	4	8	3	15
<b>Member of the GA community</b>	0	7	1	8
<b>Military</b>	0	1	0	1
<b>National representative organisation</b>	1	9	3	13
<b>Resident affected by aviation</b>	3	6	4	13
<b>Other</b>	0	3	0	3
<b>Grand Total</b>	11	50	19	80

**Table 35** - Questions 15 & 16: Option 8: Do nothing - no changes to the CAP 1616 stages, steps and gateways as currently described.

3.5.49 Questions 17 and 18 of the survey sought stakeholder feedback on the proposal to consolidate the Options Appraisal requirements for certain Airspace Change Proposals.

**Figure 36** Question 17 Should we consolidate the options appraisal requirements for certain ACPs?



**Figure 36** - Question 17: Consolidate Options Appraisal requirements for certain Airspace Change Proposals.

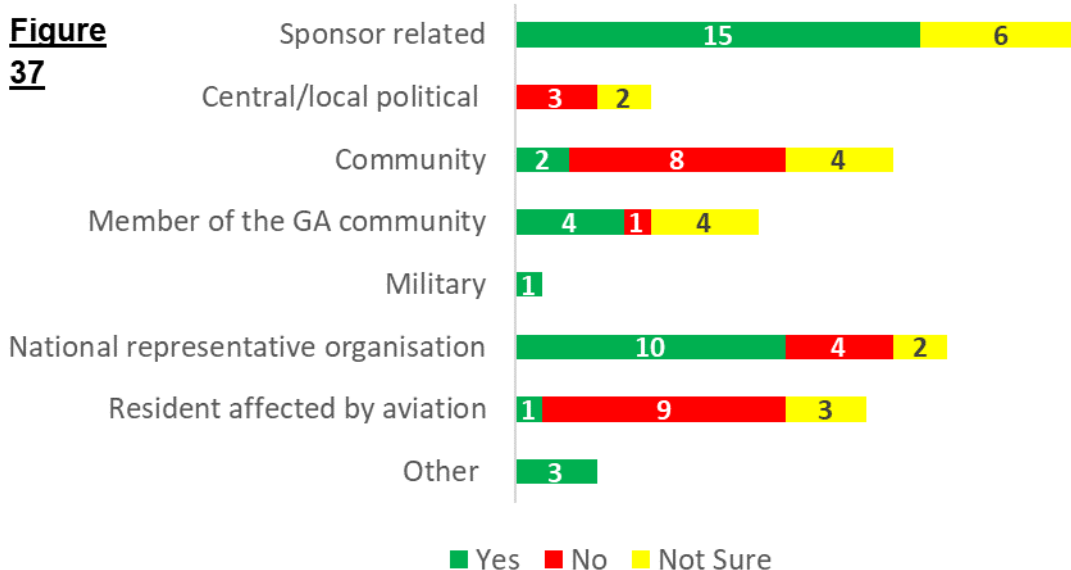
3.5.50 The chart above (**Figure 36**) shows that 44%, (36 out of 82) of respondents agreed with the proposal to consolidate the Options Appraisals requirements for certain Airspace Change Proposals. However, 30%, (25 out of 82) of respondents did not want this option to be progressed and 26% (21 out of 82) were not sure.

Should we consolidate the Options Appraisal requirements for certain Airspace Change Proposals?	Yes	No	Not Sure	Grand Total
Number	36	25	21	82

**Table 36** - Question 17: Consolidate Options Appraisal requirements for certain Airspace Change Proposals.

3.5.51 The chart below (**Figure 37**) shows a breakdown of responses by stakeholder type in numbers. 71% (15 out of 21) of respondents who identified as Change Sponsor related stakeholders said they did want the Options Appraisals requirements to be consolidated for certain Airspace Change Proposals. Conversely, 69% (9 out of 13) of residents affected by aviation stated that they did not want this option to progress.

Should we consolidate the options appraisal requirements for certain ACPs? (Respondent type by number for question 17)



**Figure 37** - Question 17: Consolidate Options Appraisal requirements for certain Airspace Change Proposals.

Should we consolidate the Options Appraisal requirements for certain Airspace Change Proposals?	Yes	No	Not Sure	Grand Total
<b>Sponsor related</b>	15	0	6	21
<b>Central/local political</b>	0	3	2	5
<b>Community</b>	2	8	4	14
<b>Member of the GA community</b>	4	1	4	9
<b>Military</b>	1	0	0	1
<b>National representative organisation</b>	10	4	2	16
<b>Resident affected by aviation</b>	1	9	3	13
<b>Other</b>	3	0	0	3
<b>Grand Total</b>	36	25	21	82

**Table 37** - Question 17: Consolidate Options Appraisal requirements for certain Airspace Change Proposals.

## Options Appraisal requirements

3.5.52 In question 18, consultees were asked to expand on how they responded to question 17 which asked for their views on whether the Options Appraisal requirements for certain Airspace Change Proposals should be consolidated. The Consultation Guidance and Options document proposed that an allowance could be made within the updated Airspace Change Process for the Initial and Full Options Appraisal to be consolidated for the Stage 3 (Consult) Gateway. It stated that 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 Airspace Change Proposals 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). Question 18 sought respondent's views on this proposal. Key themes which arose within the qualitative feedback were effectiveness of the Airspace Change Process, scalability for specific Airspace Change Proposals and types of Airspace Change Proposals, transparency, Change Sponsor resource, benefit of the proposal to Change Sponsors and engagement and consultation.

- 3.5.53 Generally, Change Sponsors supported the proposal to consolidate Options Appraisal requirements, stating that this would provide Airspace Change Process simplification, increasing the efficacy of the Airspace Change Process and would therefore alleviate resource requirements.

***“Anything that streamlines the process is good. We support the reduction on sponsors on the burden of ACP by reducing the overhead and time thus reducing the risk.”*** **Change Sponsor – Airport.**

- 3.5.54 The military stakeholder welcomed the consolidation of Options Appraisals and felt that this could be particularly appropriate for Special Use Airspace Airspace Change Proposals.

***“... supports the proposal to consolidate options appraisal requirements for certain ACPs. This would be particularly suitable for SUA where there is likely to be only one preferred option.”*** **Military**

- 3.5.55 It was also expressed that this proposal would support scalability by being appropriate for certain types of Airspace Change Proposal or bespoke for a specific Airspace Change Proposal. Some Change Sponsors, however, felt that the determining factor as to whether the Options Appraisal requirements for a certain Airspace Change Proposal can be combined should be the scale/scope of the changes rather than the number of options.

***“The combination of appraisals should be based on the scale of the changes, not just number of options.”*** **Change Sponsor - Airspace change consultancy.**

- 3.5.56 Other suggestions were made by Change Sponsors as to how the consolidation of Options Appraisal requirements should be determined:

***“Consolidating options appraisal requirements should be considered for certain Levels of ACP where there is either no requirement for any quantitative environmental assessments e.g., those ACPs where noise is not expected to change or where the ACP will not affect traffic distribution in any significant way below 7000ft.”*** **Change Sponsor - Airspace change consultancy.**

***“We welcome the proposal to consolidate the IOA and FOA for certain ACPs but question the restrictiveness of the proposal. It is important that any change to the process allows for greater flexibility. There is an opportunity to introduce more proportionality in the process, by basing the decision on whether assessments can be combined on the scope of the change rather than on the number of options. Community feedback we have received indicates they are most concerned about how an ACP might impact them, and therefore want to see “lines on the ground” and impacts as early as possible in the process. Introducing greater proportionality to the appraisal process would enable sponsors to have and present this information earlier.”*** [Change Sponsor – Airport.](#)

- 3.5.57 One national representative organisation suggested that if this proposal is implemented for certain Airspace Change Proposals, there should be an opportunity for stakeholders to request that further appraisal work is undertaken if sufficient rationale is provided.

***“It appears sensible to reduce the workload for certain ACPs, but perhaps to provide an opportunity for other interested parties to suggest that further appraisal work is required, if a reasonable objection/rationale is provided.”*** [National representative organisation.](#)

- 3.5.58 Another national representative organisation disagreed with the proposal and raised concerns about the removal of some of the regulatory requirements within Stage 2, viewing this as a backwards step.

***“The proposal to remove a stage would seem to detract from the iterative process. Furthermore, the risk of removing some of the regulatory requirements from the Stage 2 process seems to be unnecessary and a retrograde step.”*** [National representative organisation.](#)

- 3.5.59 Some Change Sponsors felt that, if implemented, this proposal could simply move workload/resource to another stage without any real reduction in Change Sponsor resource.

***“Where an ACP only has 1 viable option this would be suitable. However, we are unclear on how this saves work – at what point would the sponsor have it confirmed the CAA agree there is only 1 option, and therefore potentially have workload reduced? This needs to take place very early in the process.”*** [Change Sponsor – Airport.](#)

- 3.5.60 Generally, residents affected by aviation and local representative organisations felt that consolidating the Options Appraisal requirements would have a negative impact on impacted communities, advising that it would reduce resident involvement in the Airspace Change Process, leading to less transparency.

***“The current system is fair to the sponsors and the residents. Changes would skew the process in a way to disenfranchise the voice of local residents.” Resident affected by aviation.***

***“This is likely to reduce community involvement even more than it is now.” Local representative organisation.***

- 3.5.61 Residents affected by aviation and community noise groups wanted to understand how consolidation of Options Appraisal requirements would affect the opportunities for stakeholder engagement, as well as ensuring that transparency and consultation are maintained.

***“It is not explained how such a consolidation would affect the opportunities for stakeholder engagement.” Resident affected by aviation.***

***“The current structure allows greater scrutiny of the options being proposed. If any change is to be made it is that Final Options Appraisal should be brought forward to Stage 4 and perhaps an additional round of consultation undertaken to ensure maximise public visibility of the ACP.” Community noise group) and resident affected by aviation.***

- 3.5.62 A central/local government body also raised concerns that consolidating Options Appraisal requirements may lead to less engagement opportunities.

***“It would appear to be intended to streamline the process to make it less onerous for change sponsors and the CAA, and may in practice be preferable for some changes, but there is a danger that the list of options is presented as a 'done deal' without responses feeding into the list of potential options.” Central or local government body.***

- 3.5.63 Some national and local representative organisations who disagreed with the proposal voiced that the current Options Appraisal process allows for good quality control in the process.

***“The consolidation of the appraisal shouldn’t be pursued. It is useful as a quality control stage as well as checking that the pathway is heading in the right direction.” National representative organisation.***

***“We think it essential to have a gateway between option identification and option appraisal, but we think that the process could be streamlined by removing the existing gateway immediately after identification of DPs (particularly if some DPs are to be mandatory).” Local representative organisation.***

- 3.5.64 Some stakeholders took the opportunity to expand on their answer to questions 15 and 16, which asked respondents if they agreed, disagreed or were not sure about different options to modify Airspace Change Proposal stages, steps, and gateways. Generally, there was support from some stakeholders for Option 4



(question 15) which proposed to combine Steps 2A (Options Development) and 2B (Options Appraisal) to create Stage 2 (Develop and Assess).

***“We support option 4 as we feel this both simplifies and reduces process with no risk to gateway lead times. Some of the other options either reduces the effort of the process but increase lead time or vice versa.” Other.***

***“Option 4 is a reasonable course of action as this whole section focuses on the options with an assessment against the design principles and then the Initial Options Appraisal; both are submitted anyway to support the Develop and Assess Gateway.” Change Sponsor - Airspace change consultancy.***

3.5.65 As seen in question 16, there was support for Option 6 from Change Sponsors, which proposed to combine Steps 4A (Update Design) and 4B (Submit Airspace Change Proposal) within Stage 4.

***“Overall Option 6 is preferred as it both simplifies and reduces effort at no added risk to gateway lead times.” Change Sponsor – Airport.***

3.5.66 A national representative organisation voiced that transparency, engagement and accountability must be maintained, whichever proposals for stages, steps and gateways are progressed.

***“Whichever Options or combination of Options is decided upon, such consolidation has to be shown to add value to all parties and still ensure transparency and accountability. Care needs to be taken that simplification of the process does not detract from stakeholder visibility and engagement or increase the risk of a Judicial review.” National representative organisation.***

### **Content or placement of flowcharts in the revised airspace change process**

3.5.67 Consultees were asked for their suggestions about the content or placement of flowcharts in the revised Airspace Change Process within question 19 of the consultation. Key themes which arose from the feedback included complexity (layout), Airspace Change Process effectiveness, and clarification in terms of quality.

3.5.68 Many stakeholders were in favour of the inclusion of flowcharts in the revised Airspace Change Process, with many commenting that they provide clarification. Several stakeholders said that they need to be clearly presented and placed alongside the relevant subject matter text. Some local representative organisations voiced that all relevant information should be displayed together, rather than having some flowcharts within appendices.

***“Charts should be alongside the chapter/text in discussion rather than in an appendix. All relevant information should be displayed together.”***

**Community noise group.**

- 3.5.69 A central/local government body and a Councillor/MP said it would be helpful if the flowcharts could be positioned at both the beginning and end of each of the stages for the ease of the reader. Many Change Sponsors supported flowcharts being placed at the beginning of each stage, advising that this would direct the Change Sponsor towards the workflow and actions required. Another Change Sponsor said it would be helpful if the flowcharts differentiated between mandatory and optional requirements.

***“We would welcome a differentiation between mandatory (must) and optional (should/could) requirements as part of the flow-charts.”*** **Change Sponsor – Airport.**

- 3.5.70 Members of the GA community supported the retention of any diagrammatic representations, advising that they are a key feature of the document and that it is vital that they are kept as simple as possible, while also reflecting what has been described in the associated text. A national representative organisation asked for the content of the flowcharts to cover the various types of Airspace Change Proposal's.

***“The flowcharts are a key feature... Keeping these flowcharts as simple as possible is a necessity - but they obviously must reflect what is described beforehand.”*** **Member of the General Aviation Community.**

***“They will need to cover the various types of ACP's.”*** **National representative organisation.**

- 3.5.71 A Change Sponsor expressed that the whole CAP 1616 Airspace Change Process should be process mapped with signposts to the relevant materials. They also felt that checklists should also set out the marking criteria to improve transparency and consistency of the Airspace Change Process for stakeholders and Change Sponsors. Another Change Sponsor said that they support the inclusion of flowcharts with similar content to that provided currently.

***“The whole CAP1616 process should be process mapped with signposts to the relevant checklists, guidance, templates for completion etc. The checklists should also set out the marking criteria to improve transparency and consistency of the process for stakeholders and change sponsors.”*** **Change Sponsor – Airport.**

- 3.5.72 A military stakeholder supported the proposal to review and improve stage flowcharts and suggested that these could be reviewed in conjunction with the proposed checklists.

***“[Military stakeholder] supports the proposal to review and improve stage flowcharts. This could be combined with the previously proposed checklists.” Military***

### **High-level proposals for Stages, Steps, and Gateways**

3.5.73 Under question 20, consultees voiced their views on the high-level options for stages, steps and gateways raised in questions 15 and 16 of the survey. Some respondents provided feedback on the options themselves, while others discussed, in both positive and negative terms, the way the options would affect them. Generally, Change Sponsors desired options that would streamline the Airspace Change Process and make the most effective use of financial and staff resources. General Aviation and community stakeholders wanted greater transparency and were concerned about the potential for less stakeholder input into parts of the Airspace Change Process with some of the options, especially those proposing the removal of the Stage 1 gateway and the moving of Step 3D into Stage 4. All stakeholders wanted more simplicity out of the Airspace Change Process.

3.5.74 Some Change Sponsor-related stakeholders said they supported proposals to streamline the Airspace Change Process. They cited Option 1 (the removal of Stage 1 gateway with requirements being moved to the end of Stage 2 for a single gateway) and Option 4 (combining Steps 2A and 2B, for a singular Stage 2) as possible ways to achieve this. Option 1 was popular for the reasons of giving engagement continuity between Stages 1 and 2 as well as saving time on waiting for two gateways:

***“I think that it is difficult to engage with the same stakeholders in Stage 1 and Stage 2 if there is a pause in between. People move on.... They may not be re-elected, they may move house, give up their voluntary roles...A wide variety of reasons so I think Stage 1 and Stage 2A should be combined for engagement continuity.” Change Sponsor – Airport.***

***“In practice it makes no real difference to sponsors if extant activities need to be completed within stage 2.” Military***

3.5.75 Stakeholders representing communities and other airspace users discussed the impact of Options 1 and 4. A community noise group explained why they opposed these options.

***“[Community Noise Group] disagree with this [Option one] as it would appear to reduce opportunities for early engagement... [Community Noise Group] disagree with this option [four] as it is not compatible with Option***

***three which we support. However, we recognise the benefits outlined of aligning Steps 2A and 2B”*** **Community noise group.**

- 3.5.76 Option 2 (moving Step 1B into Stage 2 with a single gateway at the end) and Option 3 (moving Design Principle Evaluation and Options Development into Stage 1) were discussed by stakeholders. A community noise group felt that Option 2 would provide minimal benefit for stakeholders, but agreed that moving the Design Principle Evaluation and Options Development into Stage 1 would provide good transparency of a Change Sponsor’s intentions earlier on in the Airspace Change Process:

***“[Community Noise Group] agree with this option as it would provide earlier insight into a sponsor’s comprehensive list of options and offer increased opportunity for community scrutiny of the options against the Design Principles.”*** **Community noise group**

- 3.5.77 A representative from the military agreed with Option 2, suggesting it sounded ‘logical’, though accepted that it would require the same level of resource and output. In response to Option 3, the same consultee felt it did not make sense to put an Initial Options Appraisal into the first stage:

***“It does not seem logical to have initial options development within the define stage.”*** **Military**

- 3.5.78 Many stakeholders (Change Sponsors, communities, and GA consultees alike) did not want to see the gateway from Stage 1 removed (as suggested in Options one to three). Change Sponsors saw a lot of potentially wasted effort and resource if a proposal got to the end of Stage 2 and did not progress through the gateway. Communities felt that engagement opportunities would diminish (see above), and it could become difficult for both the CAA and the Change Sponsor to claw back an Airspace Change Proposal if gateway stages are combined collapsed. The GA community felt that the removal of a gateway at Stage 1 could lead to flawed Design Principles.

***“Combining the existing early gateways would introduce a great deal of risk for sponsors. If Design Principles are not accepted or if there any issues with engagement on DPs, sponsors would need to re-do a great deal of work, not only the DP’s themselves, but potentially the DPE & IOA based on them.”*** **Change Sponsor - Airspace change consultancy**

***“ACPS that have a potential impact on communities should not collapse down the gateway stages for Level 1 and Level 2 ACPs - doing so means work is too advanced and it becomes too politically difficult for the CAA to pull a sponsor back from a process that may have early flaws inbuilt”*** **Local Representative Organisation**

***“We strongly oppose the removal of the current Stage 1 'Define' Gateway, because defining the Design Principles sets the framework for the entire process. If the Define Gateway is removed, the Change Sponsor can skew the adopted principles in its favour without the restraining hand of the CAA supporting the views of the Stakeholders if appropriate.”*** **Member of the General Aviation community**

- 3.5.79 Option 4 suggested the removal of Steps 2A and 2B to simply create a single Stage 2. The requirements for a Design Principle Evaluation and Initial Options Appraisal would remain. An ANSP consultee responded positively to this option:

***“We support this option as [ANSP name] quite often already combine this document. It also makes sense to streamline the process, particularly if the comprehensive list requirement is going.”*** **Change Sponsor – Air Navigation Service Provider.**

- 3.5.80 One political representative felt that modifications such as Option 4 would lead to less transparency:

***“The proposals for modification of some ACP stages, as described in Option 4, would potentially affected communities, view this as the CAA not being transparent?”*** **Councillor or MP.**

- 3.5.81 On Option 5 (which was to remove Step 3D and move the requirements for this step into Step 4A) consultees' views were mixed on this option. A consultee who was a resident affected by aviation summarised that delaying the result of consultation feedback until Stage 4 would mean less of a preview ahead of a decision:

***“This is a major drawback for stakeholders who currently have a preview, via the change sponsor’s Step 3D categorisation of responses report, of what the ACP might comprise.”*** **Resident Affected by Aviation.**

- 3.5.82 One ANSP Change Sponsor reflected that there was no current timeline between Steps 3D and 4A and no prescribed way of checking a submission between Stages 3 and 4. They suggested a deadline for a document submission. Another consultee (an airport) discussed the need to have separation from the end of consultation to decision making:

***“We believe there should be some form of ‘check’ after consultation; this is a combined 3D & 4A document, which summarises the consultation feedback, identifies areas of change and describes the intended update to the design. We would welcome a deadline between Gateway 3 and ACP submission.”*** **Sponsor – Air Navigation Service Provider.**

***“We disagree with Option 5 (move step 3D to step 4A) as we think it is key to separate the consultation from the final submission and believe an administrative check at this point is important to ensure that sponsors do not go to submission with the risk of the consultation being challenged”***

**Change Sponsor – Airport.**

- 3.5.83 Option 6 was a suggestion to combine Steps 4A (Update Design) and 4B (Submit Airspace Change Proposal) within Stage 4. One community consultee mentioned the potential for a lack of transparency, should these steps be combined:

***“If these Steps were combined, it would become unclear why certain decisions had been made.”*** **Local Representative Organisation.**

- 3.5.84 Change Sponsor-related consultees agreed with the reduction of steps in Stage 4, saying it added clarity and simplification, but otherwise made little difference to Change Sponsors:

***“Option 6 both simplifies and reduces effort at no added risk to Gateway lead times.”*** **Change Sponsor – Airport.**

***“Option 6 does add clarity by combining consultation approval into gateway, but otherwise makes little difference to sponsors.”*** **Military.**

- 3.5.85 Option 7 was a proposal to move defining the baseline to Stage 1 of the Airspace Change Process

- . This option was supported by 50% of those stakeholders responding to the option. Change Sponsors, although mostly accepting of this proposal, did express some caveats. Some spoke of the additional upfront cost for establishing the baseline, while a military stakeholder and an ANSP wanted a qualitative baseline only at this stage. The military stakeholder felt a quantitative baseline would be better established for consultation:

***“[Military consultee] supports proposal to define baseline at stage 1 (step 1A) as long as it is qualitative not quantitative. Quantitative analysis requires significant resource (financial and time) and is better placed in Stage 3, where it can be carried out for baseline and consultation options at the same time.”*** **Military.**

- 3.5.86 Community stakeholders also discussed the benefit of establishing the baseline in Stage 1.

***“[Community Noise Group] agree with this option as it makes sense to have the baseline defined at the start of the process.”*** **Community noise group.**

- 3.5.87 When discussing the option to ‘Do Nothing’ and not change the stages, steps and gateways for the Airspace Change Process, stakeholders were aligned. One

consultee from a community noise group simply responded “disagree” to this option. An ANSP consultee commented:

***“Doing nothing is not an option to drive change. We think the overall process needs reforming.”*** **Change Sponsor – Air Navigation Service Provider.**

### **CAA response regarding inclusion of mandatory and discretionary Design Principles (Question 8 – Option 1)**

- 3.5.88 There was support for the inclusion of mandatory and discretionary Design Principles within the revised CAP1616. We will develop a core set of mandatory Design Principles on safety, policy, and the environment and these will be applied to Levels 1, 2 and 3. These three areas are derived from the CAA’s statutory duties and therefore are fundamental requirements against which Change Sponsors will be required to evaluate their Design Options as they progress through the Airspace Change Process.
- 3.5.89 Additionally, the revised CAP 1616 will include discretionary Design Principles. The Design Principles will form a standardised framework against which Change Sponsors evaluate their Design Options as they progress through the Airspace Change Process.

### **CAA response regarding requirement to test each of the Design Principles at each stage of the Options Appraisal (Question 8 – Option 2)**

- 3.5.90 Considering 52% of respondents either disagreed or were unsure about this proposal, we will not be changing the current requirements to test Design Principles. In Stage 2, Change Sponsors will still be required to evaluate the Design Options against the Design Principles in a fair and consistent manner through the Design Principles Evaluation. We will not be extending this requirement so that Change Sponsors need to re-do their Design Principles Evaluation in Stages 3 and 4. However, the Design Principles will continue to influence the CAA’s assessment of the Change Sponsor’s Initial Options Appraisal (Stage 2) and Full Options Appraisal (Stage 3), as well as being part of the information available to us when we make our decision (Stage 5).

### **CAA response regarding proposal for removal of requirements (development of Design Principles, Design Options and/or application of the Options Appraisals process) for certain types of ACPs and which type of ACP removal of requirements could apply to (Questions 9 and 10)**

- 3.5.91 Stakeholders gave their comments on the removal of requirements for the development of Design Principles, Design Options and/or application of the Options Appraisal process for certain types of Airspace Change Proposals. We understand that 68% of the respondents to this question were either unsure or did not agree with this proposal. In response, the CAA will maintain a requirement for

all Level 1, 2 and 3 Airspace Change Proposals to develop Design Principles, so these Airspace Change Proposals have a robust foundation for the design process. The CAA are keen to reassure all stakeholders that the Airspace Change Process requirements will remain as they are for those Airspace Change Proposals that the CAA has assessed as high impact for communities and/or other airspace users i.e., Level 1 Airspace Change Proposals. More details on how the CAA will apply the modified levels of Airspace Change Proposal can be found under Section 3.4 of this document. Within the updated document set we will clearly outline how the Airspace Change Process can be scaled across the different levels.

**CAA response on removing the requirement to develop a ‘comprehensive list’ of Design Options which includes ‘radical options’ and Review stakeholder engagement requirements on Stage 2 (Develop & Assess) Design Options) (Questions 11, 12 and 13):**

- 3.5.92 We have listened carefully to the responses to questions about Design Options and engagement in Stage 2. As a result, we will be progressing the following actions.
- 3.5.93 Stakeholders supported the removal of the requirement on Change Sponsors to produce a ‘comprehensive list’ of options, and therefore we will progress this option. This will enable a greater and more targeted focus on developing realistic and viable Design Options that address the Statement of Need and align with the Design Principles. We believe that in doing so, this will lead to more meaningful engagement between the Change Sponsor and impacted stakeholders, as it will be focussed on only those Design Options that represent a realistic and viable solution to the airspace issue or opportunity identified on the statement of need.
- 3.5.94 We recognise that some radical options may not be perceived as viable but in other cases they can provide opportunities for creative thinking on possible alternatives and compromises. We would suggest that in some cases, such options should still be considered by Change Sponsors (e.g., when they are suggested by stakeholders) and a rationale should be given if they are rejected (i.e., why they are not viable/ taken forward). Guidance on this will be reflected in the updated document.
- 3.5.95 We agree with stakeholders who can see the value in robust, high-quality engagement in Stage 2. We will ensure that engagement requirements for Stage 2 remain, and we will clarify these within the updated CAP1616 document.



**CAA response on the provision of process checklists for each stage (Question 14):**

- 3.5.96 Many stakeholders were in favour of introducing a checklist of requirements for Change Sponsors for each stage of the Airspace Change Proposal process. They felt that this would provide transparency, clarity, increase process effectiveness and ensure that all regulatory requirements are followed. We agree with this feedback and have decided to proceed with this proposal. The checklists will clearly detail the requirements from each regulatory area (technical, environmental, economic, engagement and consultation and Instrument Flight Procedures), and they will be placed within the Stage 1-7 Guidance Document at each stage, making them available to all stakeholders.
- 3.5.97 It will not be possible for the CAA to provide tailored checklists for every Airspace Change Proposal level or type of Airspace Change Proposal. A checklist will be provided for each stage of the Airspace Change Process, and it will be the Change Sponsor's responsibility to complete the checklist in line with the nature of their Airspace Change Proposal. Guidance will be provided at the assessment meeting as to whether an Airspace Change Proposal can be scaled, and how.
- 3.5.98 Some Change Sponsors were concerned that the checklists may add to the requirements of the Airspace Change Process. It will be mandatory for Change Sponsors to complete the relevant checklist and include it within their submission at each stage in the Airspace Change Process. The checklist will act as a guide for Change Sponsors to ensure that they have addressed the regulatory requirements within their gateway submission. Completion of a checklist will not necessarily mean that the gateway is passed, as this will depend on the outcome of the CAA's regulatory assessment of the content of the submission against the regulatory requirements. This should increase the overall effectiveness of the Airspace Change Process and ease pressures on resource for all parties in the long term.
- 3.5.99 For those stakeholders concerned about the checklists potentially becoming a 'tick-box exercise' to pass a gateway, it will be made clear on each checklist that regardless of a Change Sponsor completing a checklist, the content of each submission will still need to go through the regulatory assessment process ahead of the gateway, and this is where the CAA will determine whether the Airspace Change Process requirements have been satisfactorily addressed. There will be no minimum requirements – the checklist will list regulatory requirements which must be met at each stage, and these will either be met or not. We believe that these checklists will act as a helpful tool for all parties, increasing the effectiveness of the Airspace Change Process by providing clarity and transparency on the regulatory requirements at each stage.

**CAA response to Modification of Airspace Change Proposal Stages, Steps and Gateways (Questions 15, 16 & 20):**

3.5.100 We are keen to simplify and rationalise the Airspace Change Process in response to feedback from stakeholders which emphasized the need for a streamlined Airspace Change Process that acknowledges the role of stakeholder engagement and holds Change Sponsors to account. We will remove the references to steps currently set out within the stages of CAP 1616.

3.5.101 We will progress the following options, based on what we have heard:

- **Option 4** – combine Steps 2A and 2B to create a single Stage 2
- **Option 6** – combine Steps 4A and 4B to create a single Stage 4
- **Option 7** – move the requirement to define the baseline to Stage 1

3.5.102 Options 4 and 6 will be implemented to simplify the presentation of the Airspace Change Process and Option 7 will be implemented to provide assurance with regards to the baseline earlier on in the Airspace Change Process. You can read more about our response to the baseline moving to Stage 1 in Section 3.4.

3.5.103 The CAA will retain the requirement to collate and review responses within Stage 3 as we recognise the preference from both Change Sponsors and other stakeholders to keep this requirement in the same place within the Airspace Change Process. The Change Sponsor will also be required to publish the categorisation for each consultation response on the Airspace Change Portal in a Consultation Response Document within Stage 3 of the Airspace Change Process.

3.5.104 We will not take forward the following options:

- **Option 1** - Remove Stage 1 gateway and move requirements into a single gateway in Stage 2. This was rejected because of feedback from stakeholders who wanted accountability at this stage and did not agree with the idea of the first gateway being at the end of Stage 2.
- **Option 2** - Move Step 1B into Stage 2, with a single gateway assessment meeting at the end of Stage 2. Some stakeholders were concerned that this would place additional risk on the Change Sponsor. If they should fail on the development of Design Principles, the Design Principle Evaluation (Step 2A) and Initial Options Appraisal (Step 2B) would also be undermined. Repeating such a stage could be costly for a Change Sponsor. We agree with this feedback.
- **Option 3** - Move Step 2A into Stage 1 as a new Step 1C and 1D. For the same reasons as above, this option was perceived as a risk in terms of resources for the Change Sponsor.
- **Option 5** - Remove Step 3D from the Airspace Change Process and move current Step 3D requirements into Step 4A. This option was rejected because it

would mean stakeholders would not see the results of consultation until Stage 4. Further, Change Sponsors wanted to see a separation between the consultation in Stage 3 and decision making in further stages.

- **Option 8** - Do nothing. No changes to the CAP 1616 stages, steps and gateways as currently described. It is evident from feedback that change was desired by all stakeholders, so this option was rejected.

3.5.106 An overview of the revised Airspace Change Process can be found within the flowchart in Appendix E.

### **CAA response on consolidating the Options Appraisal requirements for certain Airspace Change Proposals (Questions 17 & 18):**

3.5.106 To support the application of proportionality and align with feedback, we will consolidate the Initial Options Appraisal and Full Options Appraisal requirements for Airspace Change Proposals where there is a single design option only (other than the 'do nothing' baseline option). This would increase the effectiveness of the Airspace Change Process and ease resource requirements for these types of Airspace Change Proposals. There will still be a requirement to complete a Final Options Appraisal at Stage 4 for these Airspace Change Proposals.

3.5.107 Concerns were raised in relation to engagement opportunities should the initial and full appraisal processes be merged. In respect of those Airspace Change Proposals where the Options Appraisal requirements stated above will be consolidated, the Change Sponsor will still be required to seek feedback on their Design Options during stage 2, while the consultation requirements will still exist in stage 3. This would ensure that there is sufficient opportunity within the Airspace Change Process for stakeholders to hold Change Sponsors to account where necessary.

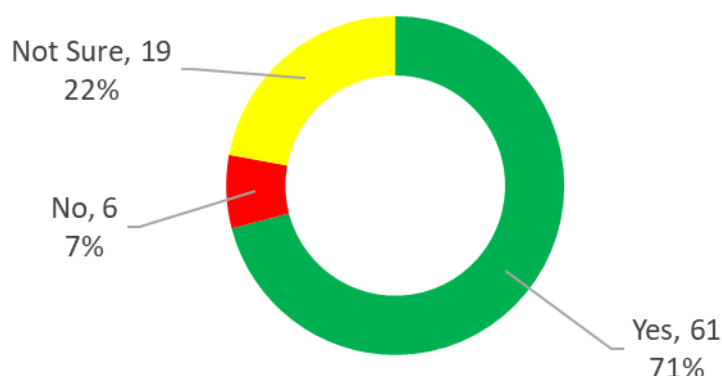
### **CAA response on reviewing CAP 1616 stage flowcharts (Question 19):**

3.5.108 In line with feedback received, flowcharts will be located at the beginning of each stage within the main Airspace Change Process document and each relevant Guidance Document. There will be separate flowcharts provided for Temporary Airspace Change Proposals and Airspace Trials. We will consider developing further flowcharts. A scalability matrix will be provided within the new document set which will detail which requirements are mandatory or optional, therefore there won't be a need for this to be duplicated in the flowchart.

## 3.6 Engagement, Consultation and Communications

3.6.1 For our fourth theme we discussed engagement, consultation, and communications. Our analysis of feedback to survey questions 21 to 28 is presented in this section. Question 21 of the consultation survey sought feedback on the proposal to establish a dedicated CAA point of contact for Airspace Change Proposal related enquiries.

**Figure 38** Question 21 Should we have a dedicated CAA point of contact for stakeholders on ACP related enquiries?



**Figure 38** - Question 21: Establish dedicated CAA-point of contact for Airspace Change Proposal related enquiries.

3.6.2 The chart above (**Figure 38**) shows that (71% (61 out of 86) of respondents felt that the CAA should provide a dedicated point of contact for Airspace Change Proposal related enquiries. 2% (19 out of 86) of respondents were not sure about this proposal and 7% (6 out of 86) of respondents disagreed with this proposal.

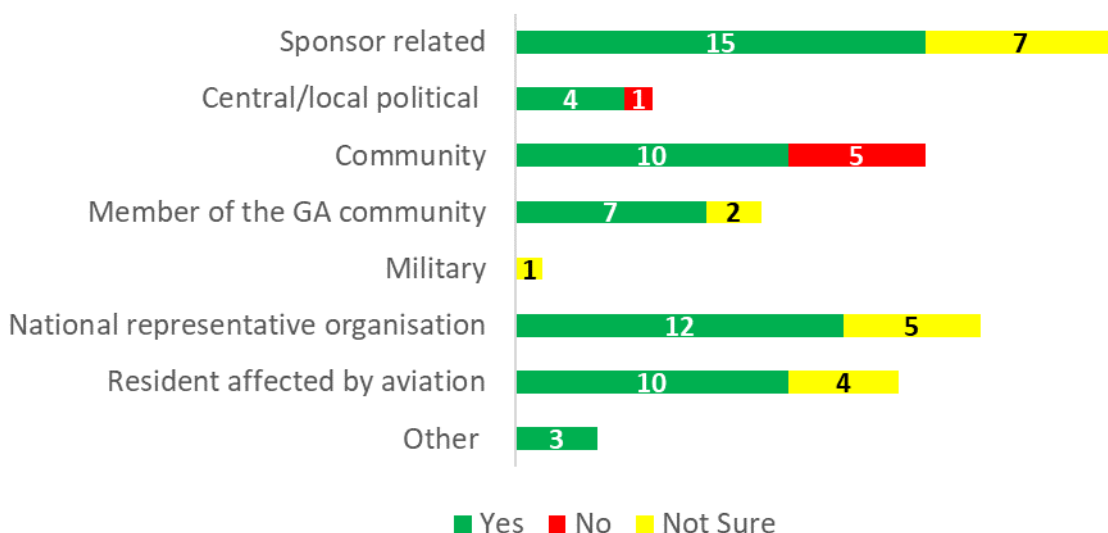
Should we have dedicated CAA point of contact for stakeholders on Airspace Change Proposal related enquiries?	Yes	No	Not Sure	Grand Total
Number	61	6	19	86

**Table 38** – Question 21: Establish dedicated CAA-point of contact for Airspace Change Proposal related enquiries.

3.6.3 The chart below (**Figure 39**) shows a breakdown of responses by stakeholder type in numbers. 71% (12 out of 17) of national representative organisations, 71% (10 out of 14) of residents affected by aviation 68% (15 out of 22) Change Sponsor

related stakeholders and 67% (10 out of 15) community stakeholders and said they wanted a dedicated CAA point of contact.

**Figure 39** Should we have a dedicated CAA point of contact for stakeholders on ACP related enquiries? (Respondent type by number for question 21)



**Figure 39** - Question 21: Establish dedicated CAA-point of contact for Airspace Change Proposal related enquiries.

Should we have a dedicated CAA point of contact for stakeholders on Airspace Change Proposal related enquiries?	Yes	No	Not Sure	Grand Total
<b>Sponsor related</b>	15	0	7	22
<b>Central/local political</b>	4	1	0	5
<b>Community</b>	10	5	0	15
<b>Member of the GA community</b>	7	0	2	9
<b>Military</b>	0	0	1	1
<b>National representative organisation</b>	12	0	5	17
<b>Resident affected by aviation</b>	10	0	4	14
<b>Other</b>	3	0	0	3
<b>Grand Total</b>	61	6	19	86

**Table 39** – Question 21: Establish dedicated CAA-point of contact for Airspace Change Proposal related enquiries

3.6.4 We asked stakeholders for their views on our proposal to establish a dedicated CAA point of contact for Airspace Change Proposals related enquiries. Stakeholders in favour of the proposal suggested that it offered the potential for

improved efficiency, access to consistent advice, quick resolution of queries, benefits for Change Sponsors from outside of the UK, providing confidence for stakeholders and improved engagement and communications:

***“Creating a single and easily accessible point of contact is a positive step and will provide confidence to stakeholders.” National representative organisation.***

***“At present there is no way for a stakeholder to contact the CAA if, for example, they know of a substantive breach of CAP 1616 requirements by an ACP sponsor or if there is a material difference in interpretation of CAP 1616 – except by contacting the Chief Executive of the CAA when the CAP reaches a gateway. A dedicated point of contact would allow such issues to be resolved earlier in the process.” Local representative organisation.***

- 3.6.5 While some stakeholders welcomed the proposal, they felt that adequate and appropriate resource needed to be in place otherwise unnecessary delay might result:

***“This change must not take resource away from the Regulatory Team. This would have the potential to cause delays and add cost to the CAP. The single point of contact needs to have the capacity to respond to enquiries in a timely manner otherwise it will create further delays.” Change Sponsor – Air Navigation Service Provider.***

***“...this could put unnecessary burden on the CAA in effect creating a post box.” Member of the General Aviation community.***

- 3.6.6 While some feedback was received regarding what the remit of the dedicated point of contact should be, clarification was also sought regarding what provision was envisaged:

***“Would be helpful but only if the CAA are prepared to provide more guidance than a quote from CAP 1616.” Change Sponsor – Airport.***

***“A dedicated CAA point of contact for stakeholders who have questions or challenges regarding the process would be useful, but only if the CAA point of contact dealt with questions about the process in the context of specific ACPs. Stakeholders who do not know the process, or should know the process, ask questions of sponsors that would be better answered and should be answered by the CAA.” National representative organisation.***

***“It is not clear from the proposal what the CAA point of contact would be expected to provide. The nominated person may also become quickly overwhelmed by volume of contact.” Military.***

- 3.6.7 Some stakeholders considered that a dedicated point of contact would be useful for communities and residents:

***“...this would be particularly useful for community groups and residents who aren’t engaged with their airport via one of the formal structures but who will likely be impacted by an ACP.” Community noise group.***

- 3.6.8 However, others referred to the statement in the consultation document that stakeholders making enquiries regarding the specifics of an individual Airspace Change Proposal would be re-directed to the relevant Change Sponsor. It was felt that only Change Sponsors would benefit and that all stakeholders should have equal access to the same level of information and support:

***“If a dedicated point of contact is provided only for vested industry interests, this could create a perception of bias and unfairly disadvantage community representatives who may not have the same level of access or resources. Therefore, it would be beneficial for the CAA to ensure that all stakeholders have equal access to information and support, and to avoid creating an uneven playing field that could compromise the integrity of the decision-making process.” Community noise group.***

***“The only impact for communities of introducing a dedicated point of contact would be negative in that it would disadvantage communities in comparison to other stakeholders.” Local representative organisation.***

- 3.6.9 Suggestions were made for alternative and additional solutions:

***“...the provision of a dedicated member of staff – or even more – is likely to be costly and the provision by the CAA of some initial FAQs based on trends of questions asked by stakeholders about the process would be a more cost-effective option. These FAQs could then be shared by sponsors.” National representative organisation.***

***“You do know about the Department for Transport (DfT) funded Airspace Facilitation Team in the CAA? Clearly that team has made a significant and welcomed contribution to Part 1c sponsors, so as a model for an expanded provision should be an obvious starting point.” Change Sponsor - Airspace change consultancy.***

3.6.10 We sought qualitative feedback only on what (if any) parts of the Independent Commission on Civil Aviation Noise (ICCAN) toolkit (previously developed to help Change Sponsors plan for public consultation) stakeholders thought the CAA should retain, and how it could be incorporated and managed by the CAA going forward.

3.6.11 Rather than considering that certain parts of the toolkit should be retained, many respondents wished to see it retained in its entirety:

***“The toolkit produced by ICCAN was extremely valuable and should be retained in full.”*** [Community noise group](#).

3.6.12 Some of those advocating the retention of the toolkit in full also made clear their disappointment that ICCAN had been wound down:

***“ICCAN was a very useful independent body. Its disbanding was a great shame. The Toolkit it designed was very useful and should be retained complete and awareness of its availability should be promoted.”*** [Local representative organisation](#).

3.6.13 The view was expressed that dispensing with the toolkit would be to stakeholders' detriment:

***“It seems there is no reason to dispense with it other than to make the process easier for sponsors to the detriment of people adversely impacted by the changes.”*** [Community noise group](#).

***“It is worth noting that the ICCAN toolkit has been positively received by many stakeholders and has been instrumental in improving community engagement in airport planning processes. Therefore, it is essential to maintain and review compliance with the ICCAN toolkit to ensure that the airport planning process continues to benefit all stakeholders, including communities.”*** [Community noise group](#).

3.6.14 Concern was expressed regarding the statement that the toolkit is no longer being maintained but remains available via the National Archives website:

***“Elements should be retained but it will require full management by the CAA. We cannot accept guidance/a toolkit that “sits in” the archives and is not maintained but is still referenced as best practice.”*** [Change Sponsor - Air Navigation Service Provider](#).

3.6.15 Some consultees wished to see the toolkit retained but with more simplified text:



***“Toolkit needs a complete re-write, and de-jargoned.” Resident affected by aviation.***

***“The ICCAN toolkit is still too text heavy and is still difficult to negotiate given it needs to be read alongside CAP 1616, which is way too long.” National representative organisation.***

3.6.16 Suggestions were made regarding sections of the toolkit that should be retained:

***“Parts of the ICCAN toolkit remain appropriate especially the Audience and Materials section. These could be incorporated under guidance.” National representative organisation.***

***“There are elements of the “approach” section that would be useful for sponsors going into Stage 3, but proportionality needs to be applied and therefore, it sits better as guidance, than regulation.” Change Sponsor - Airspace change consultancy.***

***“Aspects to be retained should include guidance on: identifying which groups, individuals and demographics to target for consultation should be the first key task for change sponsors; building on the audience analysis already available, this would should aim to identify all potential people who may wish to participate in the consultation; developing consultation materials which present the proposals and impacts in a way that enables those without an aviation background to give intelligent consideration and response; providing appropriate questions which enable people to provide their response and reasons for the views held on the proposals and the impacts.” Resident affected by aviation.***

3.6.17 While some stakeholders were of the view that Change Sponsors’ compliance with the toolkit should be mandatory and that the CAA should review their compliance, others suggested that the CAA incorporate elements of the toolkit within CAP 1616 as guidance rather than requirements:

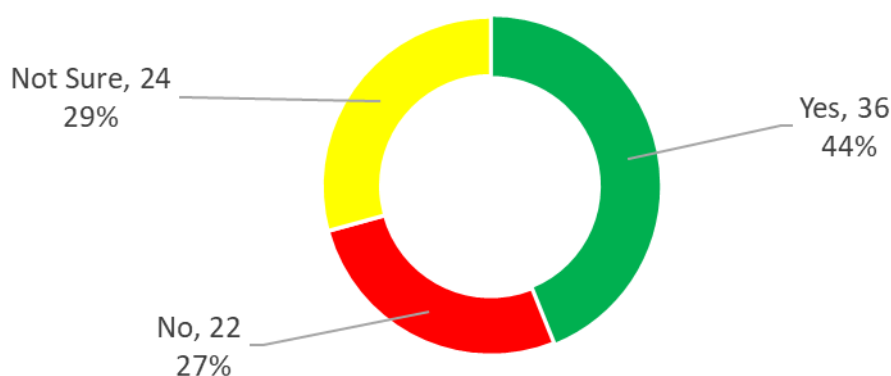
***“The inclusion of ICCAN guidance on stakeholder groups and mapping would be useful as the first paragraphs of this Appendix (C) and appropriately referenced within the main body at Stage 1 (Design) when describing engagement strategy.” Change Sponsor - Airspace Change Consultancy.***

3.6.18 The creation of a working group to review the toolkit material was suggested:

***“The concept of a toolkit to support sponsors was a good one, and there are elements that are worth retaining. However, we believe the material needs to be reviewed by a specific working group that includes industry and community stakeholders focusing on the objective of making it more tool-focussed, to facilitate practical use.”*** [Change Sponsor – Airport.](#)

3.6.19 Respondents were asked to provide their feedback on whether the guidance on categorisation of consultation responses in the Airspace Change Process should be retained.

**Figure 40** Question 24 Should the guidance on categorisation in the airspace change process (Appendix C, Table C2 of CAP 1616) be retained?



**Figure 40** - Question 24: Categorisation of consultation responses

3.6.20 The chart above (**Figure 40**) shows how respondents answered this question about retention of guidance on categorisation. 44% (36 out of 82) of respondents felt that the guidance should be retained whereas 29% (24 out of 82) were unsure and a similar percentage of respondents disagreed with the proposal (27%, 22 out of 82).

Should the guidance on categorisation in the Airspace Change Process (Appendix C, Table C2 of CAP 1616) be retained?	Yes	No	Not Sure	Grand Total
Number	36	22	24	82

**Table 40** - Question 24: Categorisation of consultation responses

3.6.21 The chart below (**Figure 41**) shows a breakdown of responses by stakeholder type in numbers. 63%, (5 out of 8) of the GA community and 52% (12 out of 23) of Change Sponsors as well as 50% (6 out of 12) of residents affected by aviation agreed that the guidance on categorisation should be retained, while 40%, 6 out of

15 of national organisations agreed. Conversely, community representatives (60%, 9 out of 15,) had the largest number of respondents who felt the guidance shouldn't be retained.

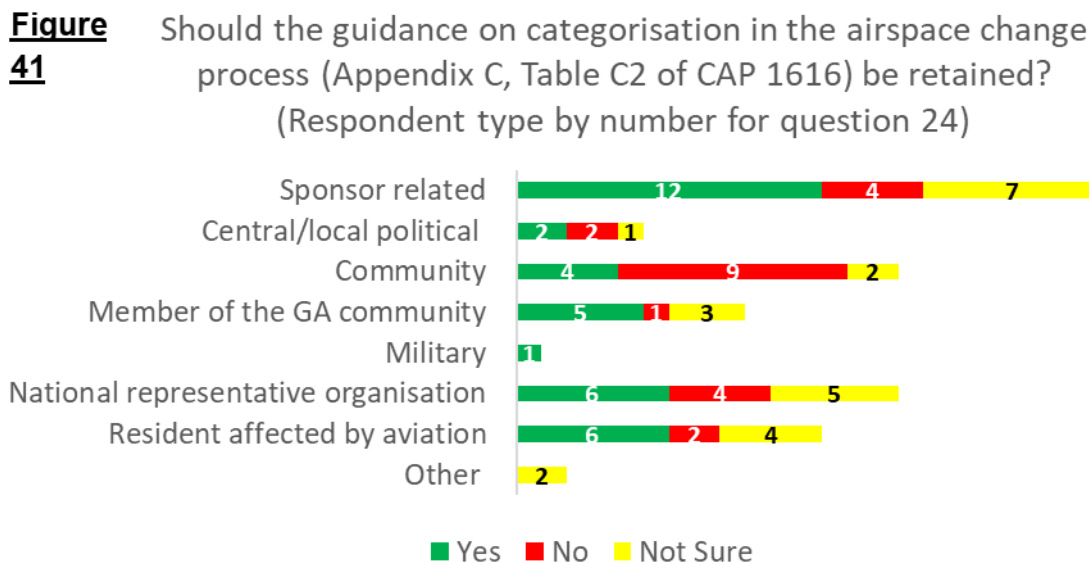


Figure 41 - Question 24: Categorisation of consultation responses

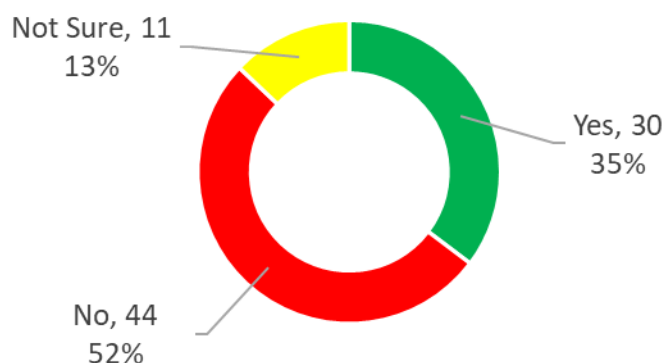
Should the guidance on categorisation in the Airspace Change Process (Appendix C, Table C2 of CAP 1616) be retained?	Yes	No	Not Sure	Grand Total
Sponsor related	12	4	7	23
Central/local political	2	2	1	5
Community	4	9	2	15
Member of the GA community	5	1	3	9
Military	1	0	0	1
National representative organisation	6	4	5	15
Resident affected by aviation	6	2	4	12
Other	0	0	2	2
<b>Grand Total</b>	<b>36</b>	<b>22</b>	<b>24</b>	<b>82</b>

Table 41 - Question 24: Categorisation of consultation responses

3.6.22 Respondents were asked to provide their views on the proposal to remove any reference to 12 weeks being the 'accepted standard' for consultation. The chart

below (**Figure 42**) shows that 52% (44 out of 85) of respondents were of the view that the requirement for an accepted standard of 12 weeks for consultation should not be removed. 35% (30 out of 85) of respondents felt that the accepted standard should be removed and 13% (11 out of 85) were unsure.

**Figure 42** Question 25 Should we remove the requirement for an accepted standard of 12 weeks?



**Figure 42** - Question 25 Remove requirement for an accepted standard of 12 weeks consultation

Should we remove the requirement for an accepted standard of 12 weeks?	Yes	No	Not Sure	Grand Total
<b>Number</b>	30	44	11	85

**Table 42** Question 25 Remove requirement for an accepted standard of 12 weeks consultation

3.6.23 The chart below (**Figure 43**) shows a breakdown of responses by stakeholder type in numbers. Change Sponsors had the highest proportion of respondents (70%, 16 out of 23) who felt that the requirement for an accepted standard of 12 weeks for consultation should be removed. In contrast, all central/local political representatives who responded disagreed, in addition to 87% (13 out of 15) of community representatives and 75% (9 out of 12) of residents affected by aviation.

**Figure 43** Should we remove the requirement for an accepted standard of 12 weeks? (Respondent type by number for question 25)



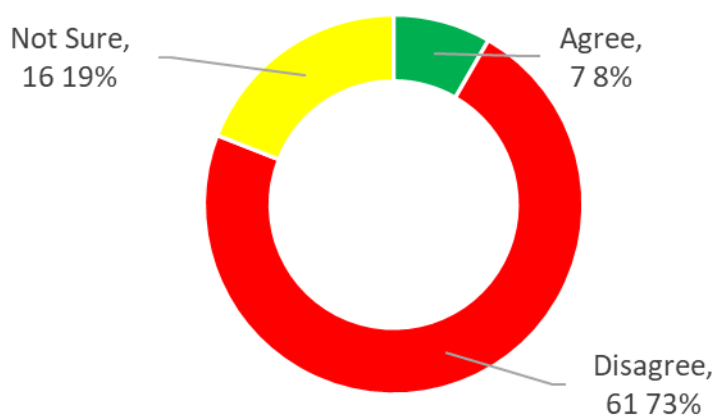
**Figure 43** - Question 25 Remove requirement for an accepted standard of 12 weeks consultation

Should we remove the requirement for an accepted standard of 12 weeks?	Yes	No	Not Sure	Grand Total
Sponsor related	16	6	1	23
Central/local political	0	5	0	5
Community	1	13	1	15
Member of the GA community	2	4	3	9
Military	1	0	0	1
National representative organisation	7	7	3	17
Resident affected by aviation	0	9	3	12
Other	3	0	0	3
<b>Grand Total</b>	<b>30</b>	<b>44</b>	<b>11</b>	<b>85</b>

**Table 43** Question 25 Remove requirement for an accepted standard of 12 weeks consultation

3.6.24 The consultation survey sought feedback from respondents on the proposal to transfer the responsibility of moderating/publishing consultation responses from the CAA to the Change Sponsor. The chart below (**Figure 44**) shows that (73%, (61 out of 84) of respondents disagreed with transferring the moderation/publication of consultation responses from the CAA to Change Sponsors. Just 8% (7 out of 84) of respondents agreed with this proposal.

**Figure 44** Question 26 Do you agree or disagree with the proposal to transfer the responsibility of moderating/publishing consultation responses from CAA to change sponsor?



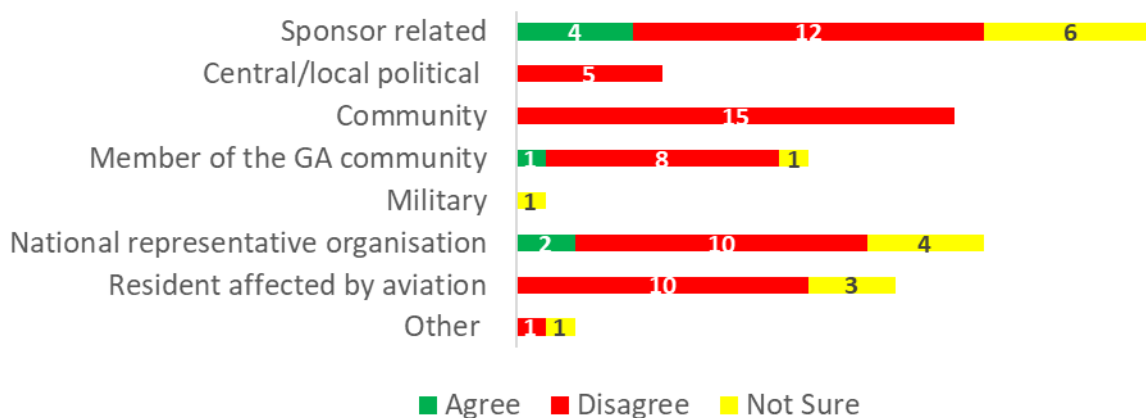
**Figure 44** - Question 26: Transfer the responsibility for moderation/publication of consultation responses to Change Sponsor.

Do you agree or disagree with the proposal to transfer the responsibility of moderating/publishing consultation responses from CAA to Change Sponsor?	Agree	Disagree	Not Sure	Grand Total
Number	7	61	16	84

**Table 44** - Question 26: Transfer the responsibility for moderation/publication of consultation responses to Change Sponsor.

**Figure 45**

Do you agree or disagree with the proposal to transfer the responsibility of moderating/publishing consultation responses from CAA to change sponsor? (Respondent type by number for question 26)



**Figure 45** - Question 26: Transfer the responsibility for moderation/publication of consultation responses to Change Sponsor.

3.6.25 The chart above (**Figure 45**) shows a breakdown of responses by stakeholder type in numbers. Central/local political and community representatives had the highest proportion of respondents who disagreed with the proposal to transfer the responsibility of moderating/publishing consultation responses to the Change Sponsor, with all respondents within those groups disagreeing. 80% (8 out of 10) of the GA community and 77% (10 out of 13) of residents affected by aviation also disagreed. Of the 7 respondents who agreed with the proposal, 4 of these were Change Sponsors.

Do you agree or disagree with the proposal to transfer the responsibility of moderating/publishing consultation responses from CAA to Change Sponsor?	Agree	Disagree	Not Sure	Grand Total
Sponsor related	4	12	6	22
Central/local political	0	5	0	5
Community	0	15	0	15
Member of the GA community	1	8	1	10
Military	0	0	1	1
National representative organisation	2	10	4	16
Resident affected by aviation	0	10	3	13
Other	0	1	1	2
<b>Grand Total</b>	<b>7</b>	<b>61</b>	<b>16</b>	<b>84</b>

**Table 45** - Question 26: Transfer the responsibility for moderation/publication of consultation responses to Change Sponsor.

3.6.26 We asked stakeholders to tell us about their views on an option to remove any reference to 12 weeks being the ‘accepted standard’ for consultation.

3.6.27 The view was expressed by some stakeholders that 12 weeks, particularly for large Airspace Change Proposals and those with significant environmental impacts, should be the minimum amount of time set for consultation. It was observed that given that material is usually quite technical, members of the public require sufficient time to process the information provided and respond:

***“The public are the largest stakeholder group, and they must have a fair opportunity to understand and assess any major ACP.”*** **Local representative organisation.**

3.6.28 Insight was provided on the approach taken by some stakeholders:

***“...A minimum of 12 weeks...would be especially useful to communities wishing to obtain expert advice about airspace change proposals that might impact them.”*** **National representative organisation.**

3.6.29 It was suggested that up to 16 weeks consultation length might be required for major Airspace Change Proposals:



***“Twelve weeks should be the minimum amount of time for a public consultation and if anything should be extended to 16 weeks for large ACPs such as the one being pursued by Heathrow as part of the Airspace Modernisation (Strategy).” Local representative organisation.***

- 3.6.30 Some who advocated a retention of the accepted standard felt that anything less than 12 weeks would provide insufficient time to respond, given the complexity of the materials presented, and that relying on a proportionate length of time for consultation could lead to Change Sponsors seeking to shorten this period:

***“If there is no accepted standard, the temptation would be to minimise the period in every case, to the detriment of consultees.” Central or Local Government body.***

***“There is nothing wrong with the inclusion of 12 weeks as an accepted CAA standard. ACPs contain complex technical detail that are more difficult to consider than an average government consultation focussed on an issue that most people understand.” Change Sponsor - Airspace change consultancy.***

- 3.6.31 Some stakeholders focussed on opportunities to apply a scaled approach to consultation length according to the type, nature, and complexity of each Airspace Change Proposal:

***“It would be better to have a shorter timeframe especially for minor changes. Four to eight weeks would be better.” Other – Airline.***

- 3.6.32 Others agreed with length being scaled, but did not wish for the Airspace Change Process to be any longer than it currently is:

***“We agree with the principle of scalability but would not wish to lengthen the process...While w, for all others 12 weeks should be acceptable otherwise the process is being unnecessarily delayed.” Change Sponsor – Air Navigation Service Provider.***

- 3.6.33 The view was expressed that flexibility could be provided by replacing the accepted standard with minimum and maximum consultation periods:

***“Removing the reference to the 12-weeks accepted standard and setting instead minimum and maximum consultation periods that are proportionate to the type of ACP, its scope and complexity, etc. would provide valuable flexibility.” Other - UAS Operator and UTM Service Provider.***

3.6.34 With flexibility there would still be the ability to extend the consultation if appropriate:

***“I think it is helpful that the timeline for a proposal be flexible and based on the complexity of the issue and stakeholder responses, with the ability to extend if stakeholder responses (for instance) are of a size or compelling enough to merit more time.”*** **Member of the General Aviation Community.**

3.6.35 It was suggested that a Stakeholder Reference Group be established, and appropriate consultation length discussed with the Group:

***“My recommendation is that a Stakeholder Reference Group should be established, and the duration of a consultation should be one of the key questions that should be discussed with such a Group taking local conditions into account.”*** **Other – Consultant.**

3.6.36 Some stakeholders sought direction from the CAA on consultation length:

***“It would be useful for sponsors to receive advice on what might be a suitable duration for different consultation scenarios, for example minimum/maximum expected, or suitable range of weeks.”*** **Military.**

***“The CAA should give guidance to sponsors on the scope and length of required consultations for different levels of ACP.”*** **Local representative organisation.**

***“The CAA should determine what is appropriate early on in the ACP process, perhaps following the Develop and Assess Gateway”.*** **Change Sponsor – Airspace Change Consultancy.**

### **Moderating/publishing consultation responses**

3.6.37 Qualitative data for question 27 regarding the option of transferring responsibility for moderating/publishing consultation responses from CAA to Change Sponsor is discussed here.

3.6.38 The key themes that emerged from feedback regarding transferring the moderation and publication of responses to the Change Sponsor related to trust, transparency, and impartiality.

3.6.39 In terms of trust and transparency, the view was expressed that transferring the task would be inappropriate as it could damage credibility in the Airspace Change Process, that Change Sponsors could not be trusted to take on the responsibility,

and that stakeholders might not feel confident that their responses were being properly noted and listened to.

***“We do not trust the change sponsor to moderate any consultation with communities.”*** Local representative organisation.

***“I have concerns about transferring moderation to the sponsor, the public may see this as a loss of transparency in the process.”*** Member of the General Aviation community.

- 3.6.40 The CAA was viewed as having gained the trust of stakeholder communities by holding responsibility for moderation and that the current arrangement provides confidence for stakeholders in the Airspace Change Process. Reference was made to public perception around trust and fairness, although some felt that any suspicion that might arise from Change Sponsors moderating could be mitigated by adequate regulatory oversight.

***“The CAA’s role in the moderation of consultation responses was key to our belief that our opinions would not simply be ignored.”*** Local representative organisation.

***“The CAA is independent in the eyes of stakeholders and is best placed to manage this role. Some stakeholders would be suspicious of sponsors making moderating decisions.”*** Change Sponsor – Airport.

***“We do not support the proposal regarding moderation/publishing. Public perceptions around trust matter and we feel that communities would be concerned if responsibility for moderating comments were transferred to the change sponsor.”*** National representative organisation.

- 3.6.41 Although on the one hand some doubt was cast on the ability of the CAA to be impartial in the moderation role that we currently conduct, consultees considered that as the independent regulator, the CAA was the more appropriate body to retain this duty. In addition, with the CAA as moderator, the same levels of standard and consistency can be applied across all Airspace Change Proposals. It was considered that Change Sponsors would lack the required impartiality to moderate responses.

***“We do not support this change as we believe that keeping the role of moderation and sponsor separate during the consultation ensures clarity and confidence in the process and provides confidence for stakeholders. In addition, by having one single entity (the CAA) taking on this role, the moderation is delivered to the same standard across all ACPs.”*** Change Sponsor – Airport.

- 3.6.42 Other comments made by those disagreeing with the proposal included highlighting a potential lack of Change Sponsor ability to moderate due to inexperience and a lack of training, that transferring would lead to an additional burden and cost for Change Sponsors who would have limited time to allocate to the task, that benefits would only result for the CAA, that transferring the task might result in an unnecessary additional risk of making the Change Sponsor judge and jury in their own cause and that transfer could lead to the need for recourse to the regulator, ombudsman, or the courts.

### **Airspace Change Portal and CAA website**

- 3.6.43 Several key themes emerged from feedback regarding making better use of the Airspace Change Portal and CAA website. These were: accessibility, information management, search functionality, document referencing and media communications.
- 3.6.44 The view was expressed that accessibility to information could be improved by providing it in a more digestible manner. It was suggested that a Frequently Asked Questions (FAQ) page and a plain English summary for each Airspace Change Proposal with its status would assist stakeholders in understanding content and that notifications of new Airspace Change Proposals or changes to existing Airspace Change Proposals be set up together with the ability to submit questions. Suggestions for improvements included: interactive maps displaying potentially affected areas, access to all CAP 725 proposals, provision of a user guide, the ability to attach documents other than in PDF format and ability to upload a KML file for the outline shape showing the airspace change area, clearer Airspace Change Proposal naming conventions, functionality for CAP 1991 airspace classification amendments, ability for Change Sponsors to add additional administrators and creation of a dashboard showing status of airspace change across the UK, by cluster and by Change Sponsor.

***“...it is essential to make the portal as user-friendly and accessible as possible to ensure that it can effectively serve its intended purpose.”***

**Community noise group.**

***“A plain English summary (perhaps written by the CAA) for each ACP and current status would also help.”*** National representative organisation.

***“An interactive map showing different ACPs, with various filters, would be helpful for stakeholders. ACPs should also be listed by type of change, for example, controlled airspace, IAP, change to nomenclature etc (some ACPs may meet more than one criterion).”*** National representative organisation.

- 3.6.45 Stakeholders made suggestions regarding how the information on the Airspace Change Portal is organised and managed. Requests were made for an archive

folder for previous versions of documents and historic changes, segmentation of paused Airspace Change Proposals from live Airspace Change Proposals, links to relevant detail from CAP 1616 guidance and related policy, the scroll tool bar through the CAP 1616 stages for each Airspace Change Proposal to be replaced by a static table of information and improved utilisation of the tool bar to enable access to documentation applicable to the stage displayed on it. Other requests made included for the stage and date of the forthcoming submission or gateway assessment meeting to be displayed on the landing page for each Airspace Change Proposal, and the ability for Change Sponsors to move the Airspace Change Proposal backwards to upload a document again.

***“Simplify the structure of the documents section, so that only the most recent versions are initially visible. Perhaps with an archive folder where previous versions are held and can be viewed... Utilise the stages tool bar better – so that by clicking on Stage 2A for example, you get the documents relevant to that stage...”*** [Change Sponsor – Airspace change consultancy.](#)

***“...The portal should have better interface to CAP1616. For example, an information link could provide extracts against the relevant CAP1616 section...”*** [Change Sponsor – Air Navigation Service Provider.](#)

- 3.6.46 Suggestions were made to improve search functionality on the Airspace Change Portal to help users find relevant content. These included improving the search function for individual Airspace Change Proposals, providing a map-based search facility, grouping documents according to stage, a postcode checker facility, improved navigation to the Airspace Change Portal from the home page, application of multiple filters simultaneously and more interactive functionality.

***“...The search could be replaced with simple dropdowns, or a map with links.”*** [Change Sponsor – Airspace change consultancy.](#)

***“The search function for ACP could benefit from an altitude and geography map.”*** [Change Sponsor – Unmanned Aerial Systems / Remotely Piloted Aircraft Systems.](#)

***“Continue to upgrade the portal so that multiple filters can be applied at the same time”*** [Change Sponsor – Air Navigation Service Provider.](#)

- 3.6.47 Improved referencing of documentation and interaction with CAP 1616 guidance was requested, for example by adding links to templates and checklists, adding guidance to the Airspace Change Portal that includes general airspace information to remove the requirement for Change Sponsors to repeat this information within their Airspace Change Proposals, and providing CAP 1616 guidance applicable to each stage on the Airspace Change Portal.

***“Some generalised guidance for different stakeholders, e.g., GA, that provides helpful pointers to relevant elements of CAP1616 will be helpful.”***  
**National representative organisation.**

***“This should include general airspace information to help stakeholders understand what airspace structures are and how they are used and managed.”*** **Change Sponsor – ANSP and Airports.**

- 3.6.48 The proposal outlined in the consultation document to develop short informative video clips or animations providing a summary of Airspace Change Process requirements was welcomed. The view was expressed that, considering the complexity of the Airspace Change Process, training would enable stakeholders to understand their role in the Airspace Change Process and its key requirements. Other suggestions related to communication channels included raising awareness of the existence of the Airspace Change Portal and of the CAA’s role in relation to Airspace Change Proposals, holding webinars and making use of other multimedia tools. A request was made for the Airspace Change Portal to enable engagement responses from stakeholders:

***“...short, informative videos and/or animations that provide a summary of the requirements throughout the airspace change process is welcomed...”***  
**Central or local government body.**

***“Providing clear and concise information about the portal and its functions is key to increasing public awareness and usage... The use of videos and other multimedia tools can also be an effective way to communicate complex information in a way that is easy to understand...”*** **Community noise group.**

***“Could the portal be developed to support direct responses from stakeholders (engagement responses) instead of using email or the Citizen Space platform.”*** **Change Sponsor – Air Navigation Service Provider.**

#### **CAA responses to Engagement, Consultation and Communication options:**

##### **Putting in place a dedicated CAA point of contact on Airspace Change Proposal related enquiries (Questions 21 and 22)**

- 3.6.49 Change Sponsors are currently assigned an account manager or lead technical regulator during the progression of their Airspace Change Proposal. As stated in the consultation document we are very aware that other 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.
- 3.6.50 We intend to complete a broader review of how we manage our responses to Airspace Change Proposal related enquiries received from external stakeholders

and the outcome of this review will determine how we will establish a dedicated CAA point of contact for these enquiries. 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 Airspace Change Proposal would be re-directed to the relevant Change Sponsor.

- 3.6.51 We intend to do more outside of the CAP 1616 Airspace Change Process in terms of providing training and information for Change Sponsors and other stakeholders to enhance their understanding of the Airspace Change Process. FAQs and/or information sheets may be provided to supplement training provision. This will be considered further as we develop our plans for the delivery of training.

**The ICCAN Consultation Toolkit (Question 23):**

- 3.6.52 We will determine what parts of the toolkit, if any, should be incorporated into CAP 1616. Any content that is incorporated will be written into the Guidance Documents.

**Categorisation of consultation responses (Question 24):**

- 3.6.53 Change Sponsors are required to categorise consultation responses at Stage 3, Step 3d of the Airspace Change Process. We sought quantitative data only for the option we presented regarding whether guidance on categorisation of consultation responses in the Airspace Change Process that is outlined at Appendix C, Table C2 of CAP 1616 should be retained. The majority view was that the guidance should be retained, and we have decided to follow the majority. The requirement to collate and review responses will be retained within Stage 3. Change Sponsors will be required to publish the categorisation for each consultation response on the Airspace Change Portal in a Consultation Response Document within Stage 3 of the Airspace Change Process.

**Removing any reference to 12 weeks being the “accepted standard” for consultation (Questions 25 and 27):**

- 3.6.54 We recognise that the government has moved away from a starting point of 12 weeks for consultation length. However, we will retain the current reference to 12 weeks being our “accepted standard” for airspace change consultations. It will remain the case that Change Sponsors may propose an alternative consultation length subject to the provision of a rationale. It is a matter for Change Sponsors to consider what is a reasonable consultation length and share that with the CAA. We will continue to robustly consider requests for a scaled length of consultation.
- 3.6.55 Other suggestions were received from stakeholders including that 12 weeks be set as a minimum length of public consultation with an extension of up to 16 weeks for larger scale Airspace Change Proposals and the setting of minimum/maximum consultation lengths applicable to different types of Airspace Change Proposal. We acknowledge the suggestions above, but also recognise the duration of the

consultation must be proportionate to the nature and impact of the proposal. This will be reflected in our guidance.

- 3.6.56 With regards to the suggestion that Stakeholder Reference Groups should be established, it remains at the Change Sponsor's discretion as to whether they choose to set up such a group to support the conduct of their engagement activities. We do not intend to mandate such a requirement because the Change Sponsor owns the Airspace Change Proposal and is solely responsible for developing it in accordance with the requirements of the Airspace Change Process. Consequently, they are responsible for considering the various engagement methodologies and developing an approach that will satisfy the needs and requirements of their stakeholders.

**Transferring the responsibility of moderating/publishing consultation responses from CAA to Change Sponsor (Questions 26 and 27):**

- 3.6.57 We have decided to transfer the responsibility of moderating and publishing consultation responses to Change Sponsors. We recognise that this decision goes against the majority view. Change Sponsors are required to conduct consultations using the Citizen Space online platform. They own the consultation response data. The functionality of Citizen Space means that all stakeholders can view all consultation responses submitted. We will still oversee the Airspace Change Process and ensure that Change Sponsors meet their obligations.

**Making better use of the Airspace Change Portal and/or the CAA website for related guidance (Question 28):**

- 3.6.58 The suggestions we received are being considered and we will work with the CAA's Airspace Change Portal development team to enhance the functionality of the Airspace Change Portal. We are looking at improved functionality for the maps displaying potentially affected areas. The Airspace Change Portal will provide stakeholders with links to short video clips and animations which will be held on the CAA website. Although the ability to capture engagement responses to Temporary Airspace Change Proposals and Airspace Trials will not be provided via the Airspace Change Portal, Change Sponsors do have the option of utilising Citizen Space to support related engagement activities, in which case the responses would be accessible.

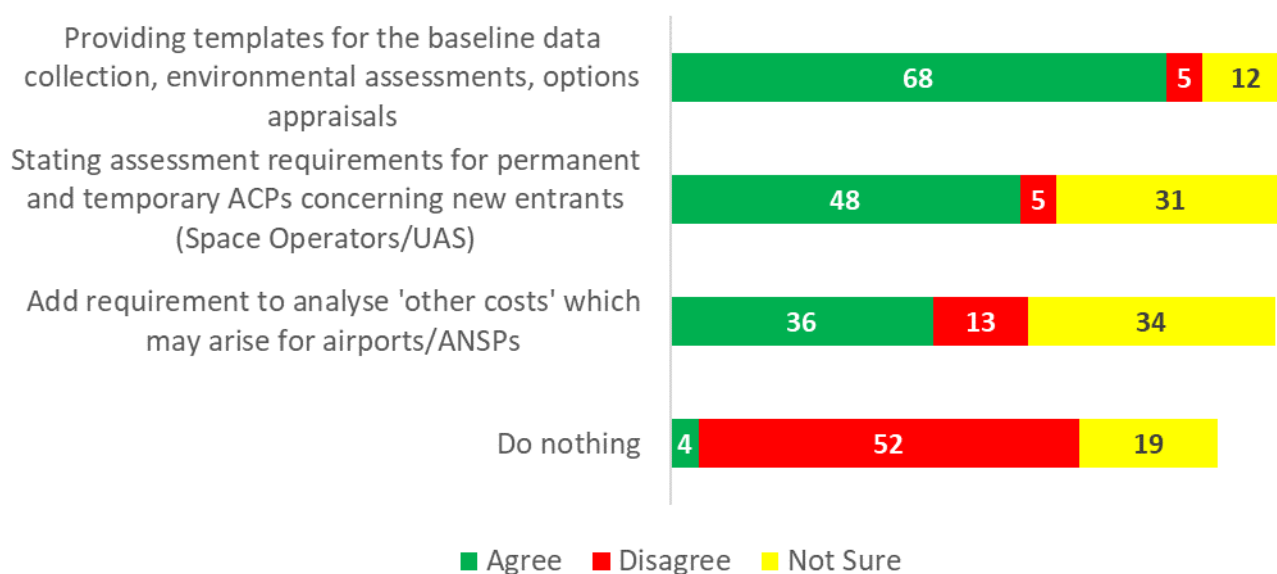


## 3.7 Clarity

- 3.7.1 Proposals regarding the clarity and complexity of CAP 1616 were the subject of survey questions 29 to 33 and the analysis of feedback on this theme is presented in this section. Question 29 sought feedback on several options relating to clarifying the assessment requirements. The chart in **Figure 46** below shows that 80% (68 out of 85) of respondents felt that the provision of templates for use by Change Sponsors for the baseline data collection, environmental assessments and Options Appraisal would be helpful.
- 3.7.2 With regards to whether the proposal to state assessment requirements for Permanent and Temporary Airspace Change Proposals concerning new entrants should be implemented, 57% (48 out of 84) respondents agreed, with a small number disagreeing (6%, 5 out of 84) and 37% (31 out of 84) answering that they were not sure. The option to add a requirement to analyse 'other costs' which may arise for airports/ANSPs had the number of respondents who were unsure at 41%, (34 out of 83), however 43% (36 out of 83) said they would find this beneficial. Corresponding to the other options, almost 70% (52 out of 75) of respondents disagreed with 'doing nothing' with regards to clarifying assessment requirements, showing support for the high-level proposals.

**Figure 46**

Question 29 Clarifying assessment requirements



**Figure 46** - Question 29: Clarify assessment requirements.

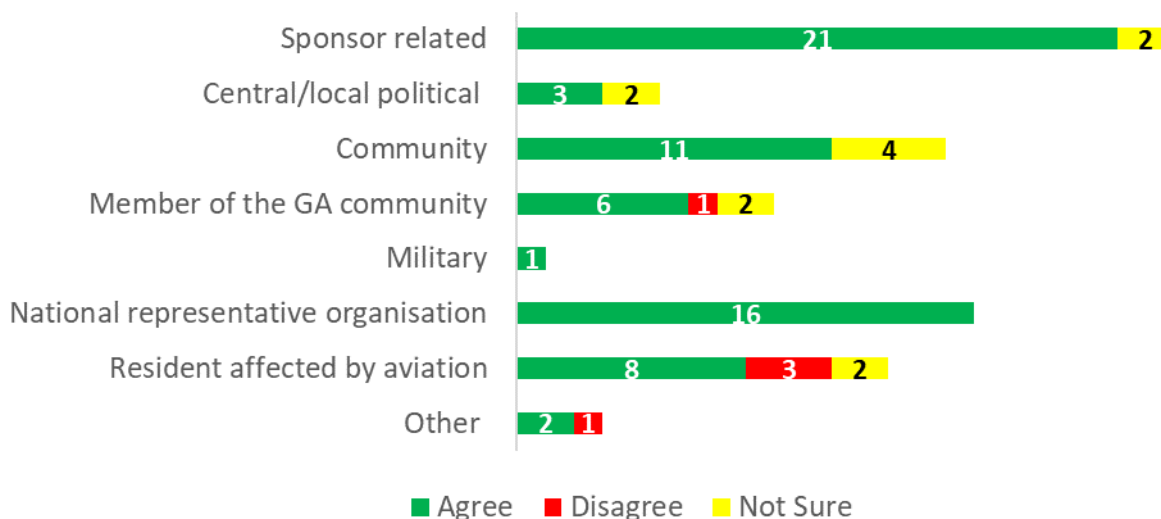
Please indicate if you agree, disagree or are not sure about the options below.	Agree	Disagree	Not Sure	Grand Total
Providing templates for the baseline data collection, environmental assessments, Options Appraisals	68	5	12	85
Stating assessment requirements for Permanent and Temporary Airspace Change Proposals concerning new entrants (Space Operators/UAS)	48	5	31	84
Add requirement to analyse 'other costs' which may arise for airports/ANSPs	36	13	34	83
Do nothing	4	52	19	75

**Table 46** - Question 29: Clarify assessment requirements.

3.7.3 The chart below (**Figure 47**) shows a breakdown of responses by stakeholder type in numbers for the first option. All stakeholders who identified as national representative organisations and the military respondent wanted to see the provision of templates as did 91% (21 out of 23) of Change Sponsor related stakeholders. The stakeholder group with the highest number of respondents who disagreed with this proposal was the resident affected by aviation cohort (23%, 3 out of 13).

**Figure 47**

1. Providing templates for the baseline data collection, environmental assessments, options appraisals (respondent type by number for question 29)



**Figure 47** - Question 29 Option 1: Providing templates for the baseline data collection, environmental assessments, option appraisals.

Option 1: Providing templates for the baseline data collection, environmental assessments, Options Appraisals	Agree	Disagree	Not Sure	Grand Total
Sponsor related	21	0	2	23
Central/local political	3	0	2	5
Community	11	0	4	15
Member of the GA community	6	1	2	9
Military	1	0	0	1
National representative organisation	16	0	0	16
Resident affected by aviation	8	3	2	13
Other	2	1	0	3
<b>Grand Total</b>	<b>68</b>	<b>5</b>	<b>12</b>	<b>85</b>

**Table 47** - Question 29 Option 1: Providing templates for the baseline data collection, environmental assessments, option appraisals.

3.7.4 The chart below (**Figure 48**) shows a breakdown of responses by stakeholder type in numbers for the second option. 75% (12 out of 16) of all stakeholders who identified as national representative organisations agreed with this proposal, as did 65% (15 out of 23) of Change Sponsor related stakeholders. As for the previous survey option, the stakeholder group with the highest number of respondents who disagreed was the residents affected by aviation cohort (23%, 3 out of 13)

**Figure 48** Stating assessment requirements for permanent and temporary ACPs concerning new entrants (Space Operators/UAS)  
(Respondent type by number for question 29)



**Figure 48** - Question 29 Option 2: Stating assessment requirements for Permanent and Temporary Airspace Change Proposals concerning new entrants.

Option 2: Stating assessment requirements for Permanent and Temporary Airspace Change Proposals concerning new entrants (Space Operators/UAS)	Agree	Disagree	Not Sure	Grand Total
Sponsor related	15	0	8	23
Central/local political	2	0	3	5
Community	7	0	7	14
Member of the GA community	6	1	2	9
Military	0	1	0	1
National representative organisation	12	0	4	16
Resident affected by aviation	5	3	5	13
Other	1	0	2	3
<b>Grand Total</b>	<b>48</b>	<b>5</b>	<b>31</b>	<b>84</b>

**Table 48** - Question 29 Option 2: Stating assessment requirements for Permanent and Temporary Airspace Change Proposals concerning new entrants.

3.7.5 The chart below (**Figure 49**) shows a breakdown of responses by stakeholder type in numbers for the third option. Respondents from community groups (57%, 8 out of 14) and the GA community (78%, 7 out of 9) had the highest proportion of those who agreed with the proposal. In addition to the military respondent disagreeing, stakeholders who identified as Change Sponsors had the second largest proportion of those who disagreed (30%, 7 out of 23), with 43% (10 out of 23) being unsure. 62% (10 out of 16) of national representative organisations were also unsure on this option.

**Figure 49**

3. Add requirement to analyse 'other costs' which may arise for airports/ANSPs (respondent type by number for question 29)



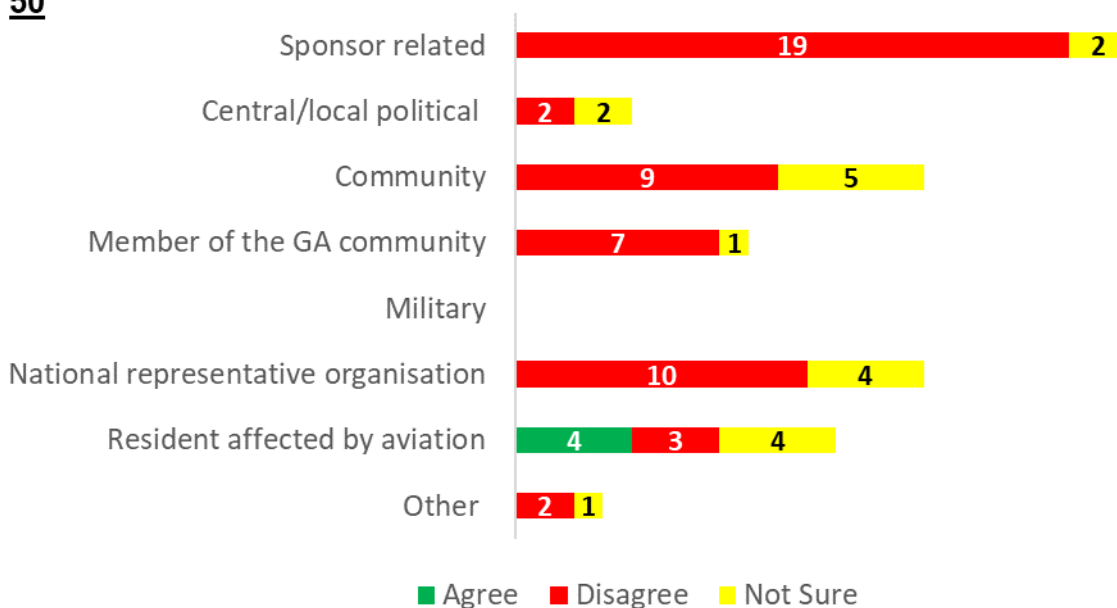
**Figure 49** - Question 29 Option 3: Add requirement to analyse 'other costs' which may arise for airports/ANSPs.

Option 3: Add requirement to analyse 'other costs' which may arise for airports/ANSPs	Agree	Disagree	Not Sure	Grand Total
Sponsor related	6	7	10	23
Central/local political	3	0	2	5
Community	8	0	6	14
Member of the GA community	7	1	1	9
Military	0	1	0	1
National representative organisation	6	0	10	16
Resident affected by aviation	6	3	4	13
Other	0	1	1	2
<b>Grand Total</b>	<b>36</b>	<b>13</b>	<b>34</b>	<b>83</b>

**Table 49** - Question 29 Option 3: Add requirement to analyse 'other costs' which may arise for airports/ANSPs.

3.7.6 The chart below (**Figure 50**) shows a breakdown of responses by stakeholder type in numbers for the fourth option. 90% (19 out of 21) of Change Sponsors, 88% (7 out of 8) of GA stakeholders and 71% (10 out of 14) of national representative organisations disagreed with doing nothing in relation to this proposal. Of the four stakeholders that agreed with 'doing nothing', these respondents were all residents affected by aviation.

**Figure 50** 4. Do Nothing (respondent type by number for question 29)



**Figure 50** - Question 29 Option 4: Do Nothing

Option 4: Do nothing	Agree	Disagree	Not Sure	Grand Total
Sponsor related	0	19	2	21
Central/local political	0	2	2	4
Community	0	9	5	14
Member of the GA community	0	7	1	8
Military	0	0	0	0
National representative organisation	0	10	4	14
Resident affected by aviation	4	3	4	11
Other	0	2	1	3
<b>Grand Total</b>	<b>4</b>	<b>52</b>	<b>19</b>	<b>75</b>

*Table 50 - Question 29 Option 4: Do Nothing*

### CAA Response to Clarify Assessment requirements (Question 29):

- 3.7.7 While the 80% of respondents felt that the provision of templates for use by Change Sponsors for the baseline data collection, environmental assessments and Options Appraisal would be helpful, we have decided not to provide specific templates for these assessment requirements. Instead, we will ensure that the new Guidance Documents are specific in terms of the information required to be included within the Change Sponsor's submission. We consider this to be sufficient to address stakeholder views because the Guidance Documents will make the regulatory requirements and CAA's expectations clear.
- 3.7.8 The majority of consultees agreed with our proposal to clearly state the assessment requirements for new entrants (Space Operators/UAS), so we will provide clarification on a case-by-case basis when working with Change Sponsors. We will also consider developing guidance for specific types of Airspace Change Proposal where we think it's required. This is considered to be sufficient to address stakeholder views because we will clarify the assessment requirements in our discussions with the Change Sponsor, the outputs from which will be accessible via the Airspace Change Portal.
- 3.7.9 Although many consultees were unsure on our proposals to add in a requirement to analyse 'other costs' for airports/ANSPs, the majority agreed with this option. Consequently, we will add this requirement in to the next version of CAP1616 to ensure that Change Sponsors provide us with a more complete and robust Options Appraisal submission.

### Proposal regarding introduction of guidance meetings:

- 3.7.10 Respondents were asked to provide their views on the suitability of guidance meetings at key points in the Airspace Change Process, in addition to their thoughts on the suitability of Change Sponsor-led briefings at key points in the

Airspace Change Process, via a free text question (question 30). Overall, stakeholders responded positively to the proposal for guidance meetings, suggesting that these could offer both clarification and transparency with regards to the Airspace Change Process.

***“We believe that this will have a positive impact on the process both for the sponsor and the CAA. This will ultimately reduce confusion and ambiguity, reduce timescales and give confidence to the sponsor that they are on the right track or not dealing with issues appropriately.”*** [Change Sponsor – Airport](#).

- 3.7.11 Although Change Sponsors were generally in support of the proposal to introduce guidance meetings, they felt that this should not be at the expense of the Airspace Change Process becoming longer and were concerned that this could become the case if CAA resource became stretched as a result.

***“...supports proposal for guidance meetings at key points in the ACP process...Must be cognisant of potential workforce implication on CAA as would not wish this to lengthen the ACP process.”*** [Military](#).

***“Guidance is always welcome, but the point of need may not be at a specific point in the process. One of the issues is the CAA resource to provide such guidance and we would not wish the process to be delayed waiting for resource to become available.”*** [Change Sponsor – Airport](#).

***“Additional guidance meetings would be welcomed. However, it is also important that meeting times are suitably available and would not introduce further delays to the process by having to wait a long period of time for a meeting.”*** [National representative organisation](#).

- 3.7.12 Timing of meetings was also highlighted by Change Sponsors as being very important, with feedback suggesting that a meeting between submission and the gateway would provide an opportunity for the CAA to clarify any details prior to the gateway decision, which may in some cases ease pressure on Change Sponsors to resolve post-gateway actions.

***“Discussion between submission and the gateway would provide an opportunity for details to be clarified, rather than requiring sponsors to address issues post-gateway.”*** [Change Sponsor – Airspace change consultancy](#).

***“A meeting after submission, prior to the gateway (during the document check would be useful). This would allow the CAA to ask any clarifying questions face-to-face/online prior to the gateway decision. Many post gateway questions are easily resolved, but a great deal of pressure is placed on sponsors immediately after the gateway to rush a response or update documents. Our preference would be to submit 8 weeks prior to Gateway***

***(and if a complex ACP, then present the opportunity to first present a summary of the info), and then after 4 weeks have another meeting with the CAA to discuss any actions or document updates. This would avoid the requirement to very, very quickly document turn arounds for post gateway actions.*** **Change Sponsor – Airspace change consultancy.**

***“...supports introduction of sponsor-led briefings at submission points. This would allow for clarification questions to be asked and answered early in the decision timeline or for any obvious rectification work to be undertaken concurrently to minimise impact on implementation...”*** **Military.**

- 3.7.13 Other Change Sponsors added that guidance meetings in the early stages of the Airspace Change Process would be beneficial.

***“We support the CAA in introducing the possibility of arranging additional guidance meetings at key points in the process, particularly at the early stages. This will likely result in a smoother and more efficient process.”*** **Change Sponsor – Unmanned Aerial Systems/Remotely Piloted Aerial Systems.**

***“Meetings early in a Stage would be useful to set expectations, specific to each ACP.”*** **Change Sponsor – Air Navigation Service Provider.**

Another Change Sponsor highlighted that a guidance meeting between the Design Principle Evaluation and the Initial Options Appraisal would be helpful.

***“At the moment I would want a guidance meeting after the DPE but before the IOA just to ensure the IOA was correct and related back, including all requirements.”*** **Change Sponsor – Airport.**

- 3.7.14 Other Change Sponsors had some suggestions about how they thought the meetings could be most beneficial.

***“...Sponsors should be fully prepared and have identified any specific areas requiring clarity, CAA representatives should have read the relevant paperwork in preparation... To make this truly useful, it needs to be specific two-way meeting.”*** **Change Sponsor – Air Navigation Service Provider.**

- 3.7.15 Community representatives including community noise groups saw the proposal to introduce guidance meetings and Change Sponsor led briefings as a benefit to Change Sponsors. They felt that the meetings should be formal and recorded to ensure engagement and transparency for impacted stakeholders, with some stakeholders proposing that evidence should be uploaded to the Airspace Change Portal.

***“Fully minuted guidance meetings would be a useful way to ensure ACP sponsors’ compliance with legal requirements (particularly in relation to ANG environmental issues) as well as demonstrating that all stages are***



***compliant with best practice in relation to option appraisal. It would improve transparency and trust in the process if local authority and community representatives could attend such meetings in an observer capacity.***

**Community representative - local representative organisation.**

***“The minutes of all meetings must appear on the CAP 1616 Portal”*** National representative organisation.

***“...even better would be if such meetings could be streamed so that it promoted transparency and accountability.”*** Local representative organisation.

***“It would be helpful if such briefing meetings were also offered to stakeholders as this would have the benefit of increasing transparency of the process. Even if this was just a recorded session shared virtual it would aide potentially affected communities to improve their understanding.”***

**Community noise group.**

- 3.7.16 Some Change Sponsors were unclear about what the content of the additional meetings being proposed would be, and what they would set out to achieve.

***“Good idea in principle. However, in our experience, very little advice or guidance is provided, other than a verbal re-iteration of what is written in CAP 1616.”*** Change Sponsor – Airspace change consultancy.

***“Guidance meetings will be helpful, but they must be meaningful and useful to the sponsor and not just saying no comment until gateway decision.”***

**Other – Noise consultant.**

- 3.7.17 Some Change Sponsors voiced that these meetings should not be mandatory and therefore a flexible approach should be adopted. Other Change Sponsors suggested that the decision to hold these meetings should be proportional to the type of Airspace Change Proposal due to the additional resource that Change Sponsors would require to attend and run these.

***“Initially I thought this might be helpful, but on reflection especially for Part 1c applicants the extra burden of time and cost might not be worth it.”***

**Change Sponsor – Airspace Change Consultancy.**

***“We believe that change sponsor-led briefings at point of submission should be left up to the change sponsor and not introduced as a requirement. This would allow change sponsors to tailor their approach to the specific needs of each ACP based on its scope and complexity.”*** Change Sponsor – Unmanned Aerial Systems/Remotely Piloted Aerial Systems.

***“A change sponsor-led meeting for clarification purposes would be useful for some ACPs but is unlikely to be necessary or required at the same time for every submission. There is no need to set a requirement for a meeting,***

***but having the option is sensible. A flexible approach should be applied, dependent on the needs and scope of the specific ACP.”*** [Change Sponsor – Airport](#).

***“In our previous case we have had regular contact with our case officer and believe this is beneficial to have a continuation of dialogue. However, these need to be appropriate for the ACP, if they are not required, they should not be mandated, as this can be additional time/resource on the project and may start to be considered additional approval points which would have a negative impact.”*** [Change Sponsor – Unmanned Aerial Systems/Remotely Piloted Aerial Systems](#).

- 3.7.18 Some Change Sponsors were in support of guidance meetings but felt that ongoing discussions between the Change Sponsor and the CAA are just as beneficial.

***“Guidance meetings can be a valuable exercise to help the change sponsor to understand what is required of them during the process. More broadly, ongoing discussion between the change sponsor and the CAA can be beneficial to both sides.”*** [Change Sponsor – Airport](#).

- 3.7.19 Conversely, other stakeholders thought that additional meetings were not necessary and felt that Change Sponsors should be seeking guidance through their dedicated point of contact.

***“This seems overly bureaucratic and in effect creates another (informal) Gateway. Surely, if a sponsor is seeking guidance, they can simply ask for it, especially if a dedicated point of contact has been established.”*** [National representative organisation](#).

- 3.7.20 Local/central political organisations agreed with the proposal to introduce additional guidance meetings at key points in the Airspace Change Process and wished to see CAA led briefings, sharing best practice examples and knowledge.

***“Agree, to further promote trust and transparency, perhaps also consider introducing CAA led briefing meetings at key stages, incorporating case studies or best practice examples. Or joint, CAA/Sponsor, led meetings.”*** [Councillor or MP](#).

### **CAA response on guidance meetings and Change Sponsor-led briefings (Question 30):**

- 3.7.21 Although community representatives saw this proposal as being advantageous to the Change Sponsor, most stakeholders responded positively to this proposal on the basis that they would provide further clarity and transparency to the Airspace Change Process. While we will progress our proposal to introduce guidance meetings and Change Sponsor-led briefings, we will make it clear that that they will be optional for both the Change Sponsor and the CAA. This is because the

Change Sponsor and the CAA should have the option to request any such meeting on a case-by-case basis, taking into consideration the individual circumstances related to each Airspace Change Proposal. The introduction of mandatory meetings and briefings beyond those already required by the Airspace Change Process, would place additional resource requirements on both the Change Sponsor and the CAA.

- 3.7.22 Change Sponsor-led briefings will take place at the point of submission. The objective of the Change Sponsor-led briefings will be for the Change Sponsor to give the CAA an overview of their submission documents at the point of each submission. In line with the views of community stakeholders, there will be a requirement for minutes of these meetings to be taken by the Change Sponsor and for the minutes to be made available on the Airspace Change Portal to provide transparency for all stakeholders.
- 3.7.23 We recognise that Change Sponsors will require guidance at other times during the Airspace Change Process and therefore we will continue to provide advice and guidance throughout the Airspace Change Process as required. We will also seek opportunities outside of the current Airspace Change Process to educate and inform Change Sponsors, sharing best practice and knowledge.
- 3.7.24 Guidance on Change Sponsor-led briefings at the point of submission and guidance meetings with the CAA will be provided.

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

- 3.7.25 Question 31 was aimed at a technical aviation stakeholder audience and asked consultees whether there is anything that should be considered when reviewing Stage 6 (Implement) of the Airspace Change Process, in addition to asking Change Sponsors what the impact may be of the change to the Aeronautical Information Exchange Model (AIXM) format for Aeronautical Information Publication (AIP) entry. A lot of stakeholders decided not to answer this open-text question for various reasons; some just left this blank, whereas others expressed that they had no view on this and some Change Sponsors said that they hadn't reached Stage 6 yet and therefore it was difficult for them to comment.
- 3.7.26 Some Change Sponsors felt that more guidance within Stage 6 would be helpful, whereas other Change Sponsors said that the current Stage 6 guidance is sufficient. An RPAS/UAS related Change Sponsor suggested that additional information and a standardised approach for implementation for Aeronautical

Information Circular (AIC) <sup>11</sup>would be beneficial, in the form of a checklist or flowchart.

- 3.7.27 Community noise groups asked for guidance on how best a Change Sponsor is to contact communities impacted by the changes, particularly for those who will be newly overflown. They expressed that they wish for this guidance to be the minimum standard and not preclude the Change Sponsor undertaking additional engagement activity. A local representative organisation also wished for environmental and community effects to be considered as part of this review. Another community noise group said they would welcome a scoping and decision-making flowchart alongside evidence to each decision made by the CAA which includes risk/sensitivity analysis and decision criteria.
- 3.7.28 Consultees took the opportunity to provide feedback about the change to the Aeronautical Information Exchange Model format for Aeronautical Information Publication entry. The CAP 1616 Review Consultation Guidance and Options document (CAP 2492) pointed out that Aeronautical Information Exchange Model will become the primary format used for providing change data to the Aeronautical Information Service Provider (AISP) in the medium-term future. It outlined that the consultation provides us with an opportunity to hear from those stakeholders that are required to submit change data to the Aeronautical Information Service Provider, and to understand whether they have the capabilities to meet this requirement and if not, what their future intentions were.
- 3.7.29 Key themes which arose in relation to Aeronautical Information Exchange Model were Change Sponsor resource, process complexity and clarification in terms of guidance. One Change Sponsor (ANSP and Airports) voiced that their APDO (Approved Procedure Design Organisation) and their surveyors will be able to submit in the required format.
- 3.7.30 Another Change Sponsor (ANSP) raised that they are already able to provide their proposed changes in Aeronautical Information Exchange Model format, but that they face a challenge with regards to how they submit their data currently, while the CAA is not yet able to accept Aeronautical Information Exchange Model data. They explained that this requires them to manually transpose data from Aeronautical Information Exchange Model into other formats the CAA is willing to accept which is both time consuming and error prone, therefore they welcome the new upcoming change of Aeronautical Information Exchange Model being the primary means of submission to the Aeronautical Information Service Provider and wish for this to be deemed as an acceptable format to submit as part of an

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<sup>11</sup> An Aeronautical Information Circular (AIC) is a notice containing information that does not qualify for the origination of a Notice to Air Missions (NOTAM) or for inclusion in the Aeronautical Information Publications (AIP), but which relates to flight safety, air navigation, technical, administrative, or legislative matters.

Airspace Change Proposal submission to the CAA. This stakeholder expressed that with the new requirement, Change Sponsors will require the Aeronautical Information Service Provider to make their full Aeronautical Information Exchange Model 5.1 dataset publicly available. They also wished for clarification to be provided on the type of data required in Aeronautical Information Exchange Model and a clear process to be provided by the CAA and the Aeronautical Information Service Provider to ensure the correct origination and processing techniques are used.

- 3.7.31 Some small to medium sized Change Sponsors (UAS/RPAS and airports) and a national representative organisation voiced that this would add another layer of complexity to the Airspace Change Process for Change Sponsors and therefore were concerned that this would have resource implications for small to medium sized Change Sponsors and new entrants.
- 3.7.32 A central/local political representative (Councillor or MP) asked if Aeronautical Information Exchange Model is secure, while an RPAS related stakeholder questioned if Aeronautical Information Exchange Model is necessary and asked what the benefits are.
- 3.7.33 Other questions from Change Sponsors (ANSPs and airports) regarding the change to Aeronautical Information Exchange Model format for Aeronautical Information Publication entry included how the change will be rolled out, how it will be managed alongside the Aeronautical Information Circular process and whether Aeronautical Information Exchange Model will be a requirement for Aeronautical Information Circulars, how the interface work alongside the Airspace Change Proposal decision making process (i.e., how much time will be required for the changed to be accepted/managed). Change Sponsors also expressed that consideration should be given to ANSP systems, airport modelling tools and network management tools.
- 3.7.34 A military stakeholder commented that implementation can be time sensitive due to nuances of the Aeronautical Information Regulation and Control (AIRAC)<sup>12</sup> cycle and ANSP capacity to process updates. They felt that this has had an impact on several Airspace Change Proposals and is not clearly articulated to Change Sponsors through CAP 1616.

**CAA response on reviewing guidance contained within Stage 6 (Question 31):**

- 3.7.35 There was no conclusive feedback provided in relation to Stage 6 guidance, as most stakeholders opted not to answer it or confirmed they had no specific

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<sup>12</sup> For operationally significant changes, the AIRAC cycle is used where revisions are produced every 56 days (double AIRAC cycle) or 28 days (single AIRAC cycle). These changes are received well in advance so that users of the aeronautical data can update their flight management systems that are used to guide aircraft along their flight plans.

observations to make. In response to the feedback that suggested more guidance would be beneficial, we will ensure that we provide additional guidance to assist Change Sponsors in managing the implementation of the change, highlighting particular areas that should be considered as part of wider change management plan. With regards to the feedback received relating to decision criteria being made available, the decision criteria for Stage 5 will continue to be published. Checklists including the requirements for each gateway assessment will also be published for each stage. The main Airspace Change Process document will also clearly list the criteria for each of the gateways for different types of Airspace Change Proposals to provide clarification to all stakeholders.

### **CAA Response to Aeronautical Information Exchange Model feedback (Question 31):**

- 3.7.36 Although Aeronautical Information Exchange Model will become the primary format used for providing change data to the Aeronautical Information Service Provider in the medium-term future, the specific technical requirements are yet to be confirmed and therefore we are currently not able to reflect these requirements in the next version of CAP 1616. In response to whether the provision of data in Aeronautical Information Exchange Model format is necessary, we are mandated to introduce data exchange in this format as described in legislation and further detailed in UK CAA Policy (CAP 1054).
- 3.7.37 There is currently no planned date for Aeronautical Information Exchange Model data exchange to be a hard requirement, however implementation will take a phased approach, aligned with industry engagement. Full guidance detailing a workable solution for all stakeholders and all types of airspace in scope (Enroute, Instrument Flight Procedures etc) will be provided well before, but to align with implementation. This may include provision of the current Aeronautical Information Exchange Model 5.1 dataset if applicable. We will take on board the resource concerns raised by Change Sponsors and new entrants and will feed these into ongoing discussions. We are continuing to engage with key players within the Aeronautical Information Exchange space. All stakeholders' needs within the data chain will be considered in the solution. In the meantime, stakeholders can seek further guidance in CAP 1054<sup>13</sup> (where Aeronautical Information Exchange Model security is expanded upon in Chapter 6) or via the related Eurocontrol pages<sup>14</sup> (where the benefits of Aeronautical Information Exchange Model are described).
- 3.7.38 Aeronautical Information Circulars could potentially be submitted via Aeronautical Information Exchange Model in future (which may be beneficial if the content is data heavy), but it may be more practical to continue to submit small/medium

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<sup>13</sup> [CAP1054: Aeronautical Information Management \(caa.co.uk\)](https://www.caa.co.uk/CAP1054)

<sup>14</sup> [AIXM](https://www.eurocontrol.int/air-traffic-control/air-traffic-management/aixm)

Aeronautical Information Circular details directly through the Aeronautical Information Publication portal. It is envisaged that small/simple changes into the Aeronautical Information Publication portal won't be impacted.

- 3.7.39 Section 2.1.2 of the current Aero data policy statement<sup>15</sup> advises Change Sponsors that the CAA will accept data in other formats with our prior authorisation. Although, at the time of writing, Aeronautical Information Exchange Model is another acceptable format our own systems to manage Aeronautical Information Exchange Model data are still in development and any such Aeronautical Information Exchange Model data would need to be accompanied with human readable reports or Aeronautical Information Publication draft pages created directly from the Aeronautical Information Exchange Model source data for us to give regulatory approval within the scope of an Airspace Change Proposal.
- 3.7.40 In terms of how this will work alongside the Airspace Change Proposal decision making process, a practical workflow will be provided so that the Aeronautical Information Exchange Model data element is required at the appropriate stage of the Airspace Change Process and in order to meet any publication deadlines. It is acknowledged that there may be AIRAC cycles that are less available to Change Sponsors due to various reasons. Guidance regarding availability of AIRAC cycles will be reflected in the relevant Guidance Documents and we encourage Change Sponsors to interact with the Aeronautical Information Service Provider at their earliest convenience.

### **Proposal regarding provision of airspace change scope flowchart.**

- 3.7.41 A free text question was used to ask respondents' views on whether an airspace change scope flowchart (like the current flowchart provided for the PPR process), should be developed and introduced. Overall, respondents thought this would be beneficial and that it would add clarity to the current guidance, with many stating that this must be clear enough to provide value.
- 3.7.42 Some Change Sponsors said that such a flowchart would provide a clear and concise overview of the airspace change scope and could be used as a useful reference tool. It was advised that this would help to avoid confusion therefore improving the overall efficacy of the Airspace Change Process. Another Change Sponsor said that flowcharts are a helpful tool to visualise the Airspace Change Process and that they would find a flowchart which included scaling and Airspace

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<sup>15</sup> [SARG Policy 125: AERONAUTICAL DATA ASSOCIATED WITH CAP 1616 AIRSPACE CHANGES](https://www.caa.co.uk/Policy-Advisory/Policy-Advisory-125-Aeronautical-Data-Associated-with-CAP-1616-Airspace-Changes)  
([caa.co.uk](https://www.caa.co.uk))

Change Proposal levels most useful to help structure an Airspace Change Proposal at the start.

***“Such a flowchart would provide a clear and concise overview of the airspace change scope and could be used as a reference tool by change sponsors throughout the ACP process.”*** [Change Sponsor – Unmanned Aircraft Systems \(UAS\) / Remotely Piloted Aircraft Systems \(RPAS\)](#).

***“If this would result in telling a sponsor a ‘potential’ level of ACP then this is useful.”*** [Change Sponsor - Airspace change consultancy](#).

- 3.7.43 Change Sponsors from the space industry supported provision of a flowchart of airspace change scope and said it would be useful, specifically if this was appropriate for Airspace Change Proposals targeted to space activities.

***“It could be useful, especially for ACP’s targeted to space activities.”*** [Change Sponsor – Space industry](#).

- 3.7.44 Residents affected by aviation said they would welcome anything that can help to improve collective understanding of an Airspace Change Proposal. They felt that this would increase transparency in the Airspace Change Process and help other stakeholders understand how definitions and criteria are applied, in addition to helping Change Sponsors accurately assess whether a change is in or out of scope.

***“Anything that can help to improve collective understanding of an ACP would be helpful and fair to the communities impacted.”*** [Resident affected by aviation](#).

***“Anything that helps AC sponsors to accurately assess whether a change is in or out of scope is to be welcomed. The transparency of such a process could also help other stakeholders understand how these definitions and criteria are applied.”*** [Local representative organisation](#).

- 3.7.45 Other stakeholders suggested that it may be tricky to ensure that the flowchart is sufficiently unambiguous, allowing Change Sponsors to determine if a change is in or out of scope. Some suggested that while a flowchart may help, a simple confirmation from the CAA on a case-by-case basis may be a better implementation.

***“Whilst a flow chart may help, a simple confirmation from the CAA on a case-by-case basis might be a far easier implementation.”*** [Change Sponsor - Airspace change consultancy](#).

- 3.7.46 Although the proposal to introduce an airspace change scope flowchart would allow for determination as to whether a proposal is in scope of the Airspace Change Process, one Change Sponsor wanted to ensure that the assessment



meeting with the CAA should remain the medium that determines the scope of the Airspace Change Proposal.

***“I think the assessment meeting with the CAA should determine the scope of the ACP.”*** **Change Sponsor – Airport.**

3.7.47 Some stakeholders agreed that a flowchart would be useful but said that it was difficult for them to comment fully until the proposed flowchart is shared.

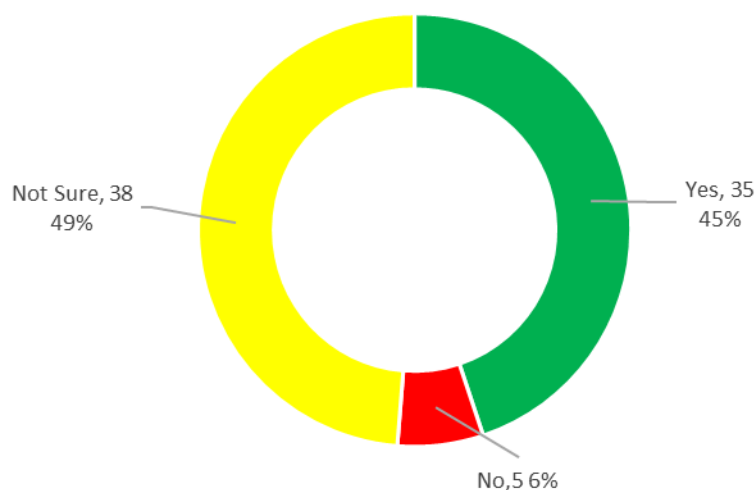
#### **CAA response on provision of airspace change scope flowchart (Question 32):**

3.7.48 We recognise from the feedback received that a clear and unambiguous flowchart detailing the scope of airspace change would be helpful to a wide range of stakeholders. We will confirm when an Airspace Change Proposal is required and whether a statement of need must be submitted within the updated CAP1616 document set.

#### **Clarify Decision Criteria**

3.7.49 Respondents were asked to provide their feedback on the proposal to clarify decision criteria via question 33 of the consultation survey.

**Figure 51** Question 33 Would examples of types of characteristics (similar to the one provided in Table G1 in Appendix G of the CAP 1616 process) be useful to sponsors to gauge to what extent their proposal is consistent with the Airspace Modernisation Strategy?



**Figure 51** - Question 33: Clarify decision criteria.

3.7.50 The chart above (**Figure 51**) shows that (45% (35 out of 78) of respondents felt that provision of examples would be useful for Change Sponsors. A slightly higher

percentage (49%, 38 out of 78) were unsure about this proposal. Just 6% (5 out of 78) of respondents disagreed with the suggestion.

Would examples of types of characteristics (similar to the one provided in Table G1 in Appendix G of the CAP 1616 Airspace Change Process) be useful to Change Sponsors to gauge to what extent their proposal is consistent with the Airspace Modernisation Strategy?	Yes	No	Not Sure	Grand Total
Number	35	5	38	78

Table 51 - Question 33: Clarify decision criteria.

3.7.51 The chart below (Figure 52) shows a breakdown of responses by stakeholder type in numbers. 65% (13 out of 20) of Change Sponsors felt that the provision of examples would be helpful, in addition to 44% (7 out of 16) of national organisations and 67% (6 out of 9) of GA stakeholders. The military respondent also agreed, along with 50% (2 out of 4) of central/local political stakeholders. The stakeholder groups with the highest proportion of those who were not sure were residents affected by aviation (73%, 8 out of 11) and community representatives (71%, 10 out of 14).

**Figure 52** Would examples of types of characteristics (similar to the one provided in Table G1 in Appendix G of the CAP 1616 process) be useful to sponsors to gauge to what extent their proposal is consistent with the Airspace Modernisation Strategy?

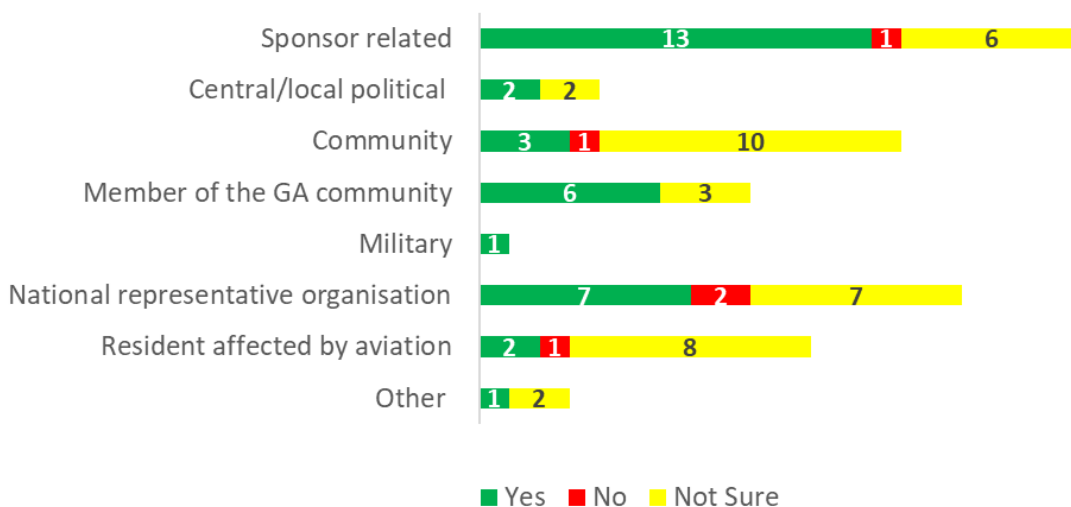


Figure 52 - Question 33: Clarify decision criteria.

<b>Would examples of types of characteristics (similar to the one provided in Table G1 in Appendix G of the CAP 1616 Airspace Change Process) be useful to Change Sponsors to gauge to what extent their proposal is consistent with the Airspace Modernisation Strategy?</b>	<b>Yes</b>	<b>No</b>	<b>Not Sure</b>	<b>Grand Total</b>
<b>Sponsor related</b>	13	1	6	20
<b>Central/local political</b>	2	0	2	4
<b>Community</b>	3	1	10	14
<b>Member of the GA community</b>	6	0	3	9
<b>Military</b>	1	0	0	1
<b>National representative organisation</b>	7	2	7	16
<b>Resident affected by aviation</b>	2	1	8	11
<b>Other</b>	1	0	2	3
<b>Grand Total</b>	35	5	38	78

*Table 52 - Question 33: Clarify decision criteria.*

- 3.7.52 A free-text question sought additional feedback from respondents as to whether types of characteristics would be useful to Change Sponsors to gauge what extent their proposal is consistent with the Airspace Modernisation Strategy (AMS), and why they responded the way they did.
- 3.7.53 Respondents agreeing with the proposal suggested that providing a list of illustrative, supporting examples intended to offer guidance on how an Airspace Change Proposal might perform against the objectives of the AMS would be useful to both Change Sponsors and other stakeholders. Some stakeholders noted that such examples would be especially useful to communities, enabling them to understand what specific benefits and impacts are envisioned to result from a proposed change.
- 3.7.54 Conversely, other respondents suggested that they already get this information from the various meetings with the Airspace Change Organising Group (ACOG) through their own work, and some suggested that the listing of such criteria is open to far too much interpretation rather than being a quantitative set of scales against which to measure the design.
- 3.7.55 Some stakeholders said it was difficult for them to comment on the potential effectiveness of this guidance without seeing the proposed table. Requests were made for this guidance to be maintained and include clear referencing to the AMS strategy.

3.7.56 One Change Sponsor asked for several examples of the types of characteristics Change Sponsors should look for in helping them gauge to what extent their proposal is consistent with the AMS. They also suggested that the guidance be applicable to spaceflight activities as well as aviation. The same respondent expressed that the link between the AMS and the UK space strategy is unclear, but this is outside the scope of this consultation.

***“It will be more relevant if there is more than one example, and those examples are not focused on aviation only. Also, it is not clear where stands the space strategy with respect to the airspace modernisation strategy. Further discussion between aviation and space communities could lead to a Global Modernisation Strategy for the use of UK airspace.”*** [Change Sponsor – Space industry](#)

3.7.57 Some respondents questioned whether this guidance should be provided earlier in the Airspace Change Process to ensure that the aims and objectives of an Airspace Change Proposal are linked to the AMS at the start.

***“We are surprised that important aspects of the AMS are not considered by CAA or necessarily by the sponsor until the final proposal is made to CAA. Is there a policy gap here? As it is very clear that maximising climb and descent profiles has emission, noise and other significant benefits, the [national representative organisation] finds it extraordinary that those issues are not required to be assessed under CAP 1616 until it is essentially too late in the process to do anything meaningful to resolve them. Getting that AMS and net-zero related detail up front and assessing it at all gateways seems like a vitally important requirement.”*** [National representative organisation](#)

***“It would be helpful and might help to bolster some introductory paragraphs within an ACP. However, should this not be something that is determined at the start of the ACP when the Statement of Need is articulated? If the aims and objectives of an ACP are not linked to the AMS at the start of the project, then this is of no use.”*** [Change Sponsor - Airspace change consultancy](#)

3.7.58 In terms of trust, transparency, and process effectiveness, it was requested that the CAA’s decision criteria are available to Change Sponsors to improve transparency and consistency of Airspace Change Process for both the Change Sponsor and stakeholders.

3.7.59 Some community representatives agreed that the CAA should clarify its decision criteria, both in relation to consistency with the AMS and assessment against the factors in section 70 of the Transport Act 2000. One respondent called for additional guidance on the CAA’s approach to deciding whether or not to approve Airspace Change Proposals where there is a conflict between one or more of the factors in section 70 of the Transport Act 2000.

***“We agree that the CAA should clarify its decision criteria, but not solely by incorporating compliance with the AMS. It should also explain how it will strike a balance between the factors set out in Transport Act 2000 section 70(2) in the event that there is a conflict between them...”*** **Local representative organisation**

3.7.60 Suggestions were made that any new guidance of this type should be tested first with Change Sponsors to ensure that the examples given deliver on the strategy as a whole, rather than individual aspects of it.

3.7.61 The view was expressed that since Design Principles should enshrine the AMS, it should already be clear to the CAA the ways in which the proposal delivers against the strategic objectives of the AMS.

***“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 is consistent with the Airspace Modernisation Strategy (AMS). This may help, but the idea should be first tested with sponsors. There is a risk that examples become the standard rather than a helpful guide and that sponsors deliver against the examples. The airspace change has to be measured against the whole AMS, not just examples. Furthermore, we already have Design Principles (DPs) which arguably should enshrine the AMS, so it should already be evident to the regulator just how much or little of the AMS objectives will be delivered.”*** **National representative organisation**

3.7.62 A stakeholder highlighted that some changes may not contribute to the delivery of the AMS, but they may nonetheless still be needed. The Change Sponsor asked how the CAA will consider those proposals.

***“... thinks that the change sponsor should be able to explain if the proposal is in line with the AMS and if not explain why the change may still be needed. [Change sponsor] co-sponsored a proposal to change arrival routes for a safety reason and therefore it was needed in advance of FASI-S which is part of the AMS.”*** **Change Sponsor – Airport**

3.7.63 One respondent felt that airspace changes need independent assessment of the overall AMS. They asked how different policies overlap and what the interaction is between airspace change and planning conditions, using an example that some airspace changes deliver additional capacity which is a benefit to industry, but stating that they should be accompanied by noise reduction as capacity increases.

***“Airspace change impacts need to be assessed independently of the overall AMS, since local planning conditions and noise control measures are also relevant. For example, it may be the sub-text of a particular airspace change that it delivers additional capacity: this is a benefit to industry and should therefore be accompanied by noise reduction as capacity increases. So national policy is also relevant.”*** **Community noise group**

- 3.7.64 One respondent queried aspects of service provision and policy in relation to air traffic services and flight information services, as envisaged by the AMS.

***“The information would be helpful. Particularly the CAA’s view of the type of airspace classification required to meet the AMS regarding the provision of ATS requiring the vectoring and sequencing of IFR and VFR traffic that currently takes place by many ANSPs under UK FIS within Class G that we understand ICAO FIS would not permit. If Class G is not appropriate and CAP1616 would not provide controlled airspace either the AMS needs to change or CAP1616 needs to be overridden to provide suitable airspace to allow airports to continue to operate – or the CAA direct that such operations are not to take place given that the current mitigation is UK FIS and the ability to vector and sequence in Class G.”*** [Change Sponsor - ANSP and Airports](#)

#### **CAA response on clarifying decision criteria (Question 33):**

- 3.7.65 The key themes that emerged from this feedback related to process effectiveness, compliance, trust, transparency, clarification, and airspace modernisation. Based on this feedback, the CAA has decided to introduce examples of the types of characteristics which indicate whether a proposal is consistent with the AMS. This is to further clarify the CAA’s decision criteria and promote transparency and consistency across proposals, which was recognised as an important need across stakeholder groups.
- 3.7.66 To reflect the feedback received, the AMS characteristics will be non-exhaustive, meaning that Change Sponsors will not be expected to meet them all and that they may be able to demonstrate alignment with the AMS in alternative ways. They will apply to both aviation and spaceflight activity (where relevant).
- 3.7.67 Queries were raised as to when and how important aspects of the AMS are considered by the Change Sponsor and the CAA during the CAP 1616 Airspace Change Process. During Stages 1 to 4 of the Airspace Change Process, Change Sponsors should ensure that they formulate their proposals having regard to the need for consistency with the AMS. Failure to do so may mean that the CAA is unable to approve their proposal. The process contains in-built steps which ensure that important aspects of the AMS are integrated into the design process from the beginning. For example, the Statement of Need form at Stage 1 includes a section for Change Sponsors to state whether their proposal supports the delivery of the AMS, and, if not, to explain how the proposal is not inconsistent with the AMS. Change Sponsors are then required to develop Design Principles which encompass the safety, environmental and operational criteria and the strategic policy objectives as reflected in the AMS and legislation. These Design Principles form a framework against which Change Sponsors evaluate their Design Options as they progress through the Airspace Change Process. As

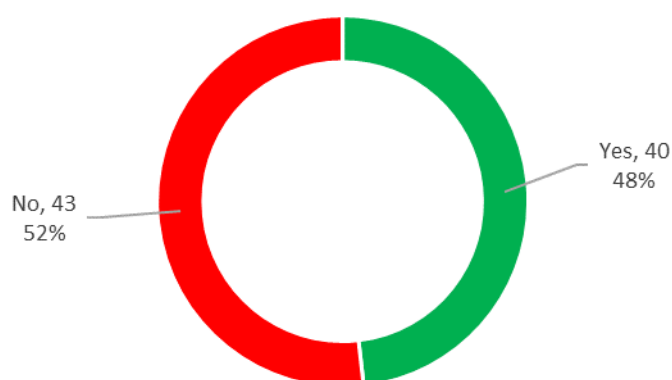
Change Sponsors refine their designs and assess the impacts of those designs in detail, Change Sponsors can refer to the new characteristics that will be included in CAP1616 to gauge to what extent their proposal is consistent with the AMS.

- 3.7.68 The CAA agrees with feedback received from one respondent that some proposals, such as those of a highly localised nature, may not further the objectives of the AMS but are nonetheless not inconsistent with the delivery of that strategy. Those proposals may proceed under the Airspace Change Process but will not need to be assessed against the strategic objectives of the AMS. Instead, Change Sponsors will need to provide an explanation to the CAA why they consider their proposal to not be inconsistent with the AMS. This will be clarified in the guidance for Stage 4 of the revised CAP1616.
- 3.7.69 One respondent requested additional guidance on the CAA's approach to deciding Airspace Change Proposals where there is a conflict between one or more of the factors in section 70 of the Transport Act 2000. Appendix G in the current version of CAP1616 provides guidance on the CAA's policy approach to managing conflicts between and within the various factors in section 70 of the Transport Act 2000. We have concluded that this guidance is useful and up to date. The content of this guidance will continue to be made available in the revised CAP1616.
- 3.7.70 Comments were made around aspects of service provision and policy in relation to air traffic services and flight information services, as envisaged by the AMS. This is outside the scope of this consultation, but the feedback been passed on to the CAA Airspace Modernisation Team for their consideration.

## 3.8 Instrument Flight Procedures (IFP)

3.8.1 Our penultimate theme concerned taking the opportunity as part of this review to add Instrument Flight Procedure references to all stages of the Airspace Change Process to provide clarity for Change Sponsors regarding how the development of Instrument Flight Procedure design impacts the . Our analysis of survey questions 34 to 36 is presented in this section.

**Figure 53** Question 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?



**Figure 53** - Question 34: Do you wish to give your views about Instrument Flight Procedures?

3.8.2 The chart above (**Figure 53**) shows that the number of respondents answering questions regarding the technical subject of Instrument Flight Procedures was just about split with 48% (40 out of 83) wishing to answer and 52% (43 out of 83) declining.

Do you wish to give your views about Instrument Flight Procedures?	Yes	No	Grand Total
Number	40	43	83

**Table 53** - Question 34: Do you wish to give your views about Instrument Flight Procedures?

3.8.3 The chart below (**Figure 54**) shows a breakdown of responses by stakeholder type in numbers. It shows that the military respondent and central/local political stakeholders didn't wish to provide their views about Instrument Flight Procedures. In contrast, 62% (13 out of 21) respondents who identified as Change Sponsors did wish to give their views regarding Instrument Flight Procedures, in addition to 69% (11 out of 16) of national representative organisations and 50% of residents affected by aviation.



**Figure 54** 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? (Respondent type by number for question 34)



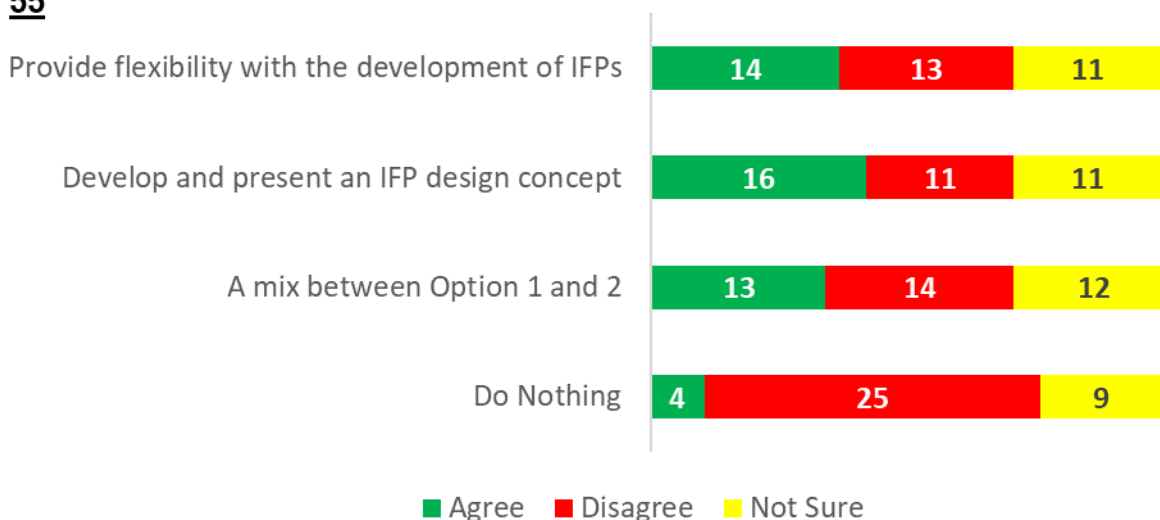
**Figure 54** - Question 34: Do you wish to give your views about Instrument Flight Procedures?

We recognise that Instrument Flight Procedures is a technical subject that some respondents may not wish to give responses on. Do you wish to give your views about Instrument Flight Procedures?	Yes	No	Grand Total
<b>Sponsor related</b>	13	8	21
<b>Central/local political</b>	0	6	6
<b>Community</b>	3	11	14
<b>Member of the GA community</b>	4	6	10
<b>Military</b>	0	1	1
<b>National representative organisation</b>	11	5	16
<b>Resident affected by aviation</b>	6	6	12
<b>Other</b>	3	0	3
<b>Grand Total</b>	40	43	83

**Table 54** - Question 34: Do you wish to give your views about IFP?

3.8.4 The high-level proposal relating to Instrument Flight Procedures that the consultation sought feedback on, was to provide clarity on Instrument Flight Procedure design requirements / expectations. Question 35 asked respondents whether the CAA should provide more flexibility to Change Sponsors and their design organisations to undertake the flyability assessment of their Instrument Flight Procedures earlier in the Airspace Change Process once their Design Options have been developed. This question also sought feedback on whether a Change Sponsor should develop an Instrument Flight Procedure design concept and present it to the CAA prior to the development of their Design Options.

**Figure 55** Question 35 Clarify IFP design requirements/expectations



**Figure 55** - Question 35: Clarify Instrument Flight Procedure design requirements/expectations.

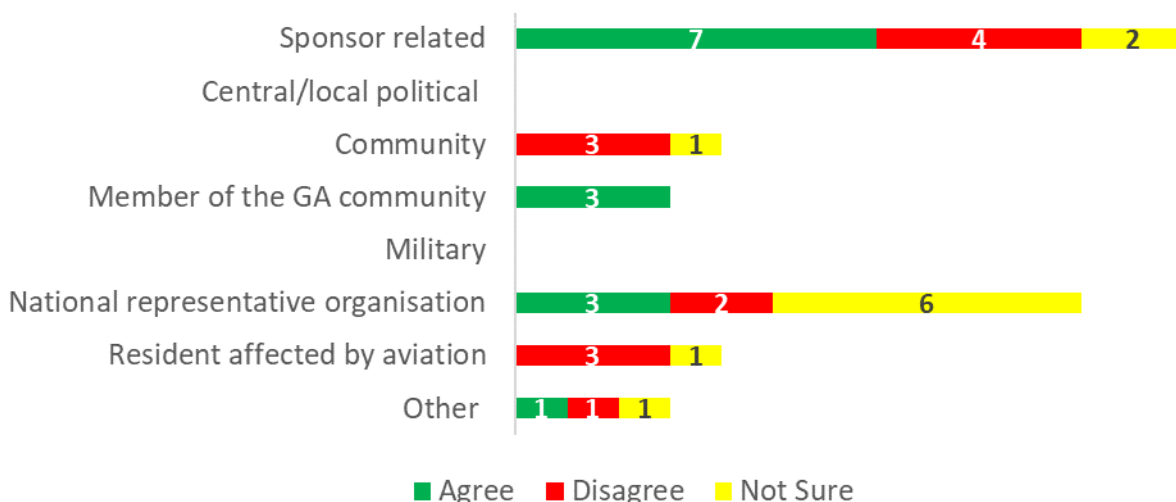
3.8.5 The chart above (**Figure 55**) shows similar responses were received for the first three Instrument Flight Procedure options presented with 37% (14 out of 38), 42% (16 out of 38) and 33% (13 out of 39) of respondents respectively agreeing with the options. Respondents also disagreed and were unsure about these three options in similar numbers. For the do-nothing option, just 11% (4 out of 38) agreed, with 66% (25 out of 38) disagreeing with doing nothing in relation to clarifying Instrument Flight Procedure design requirements/expectations.

Please indicate if you agree, disagree or are not sure about the options below	Agree	Disagree	Not Sure	Grand Total
Provide flexibility with the development of Instrument Flight Procedure s	14	13	11	38
Develop and present an Instrument Flight Procedure design concept	16	11	11	38
A mix between Option 1 and 2	13	14	12	39
Do Nothing	4	25	9	38

**Table 55** - Question 35: Clarify Instrument Flight Procedure design requirements/expectations.

3.8.6 The chart below (**Figure 56**) shows a breakdown of responses by stakeholder type in numbers for Option 1 (to provide flexibility with the development of Instrument Flight Procedure s). 50% (7 out of 14) of respondents who agreed to this option identified as Change Sponsors, with the remainder consisting of GA stakeholders, national representative organisations and a respondent identifying as 'other'. Conversely, 75% (3 out of 4) of both community representatives and residents affected by aviation disagreed with this option. National representative organisations had the highest proportion of respondents who were not sure about this option (55%, 6 out of 11).

**Figure 56** 1. Provide flexibility with the development of IFPs (respondent type by number for question 35)



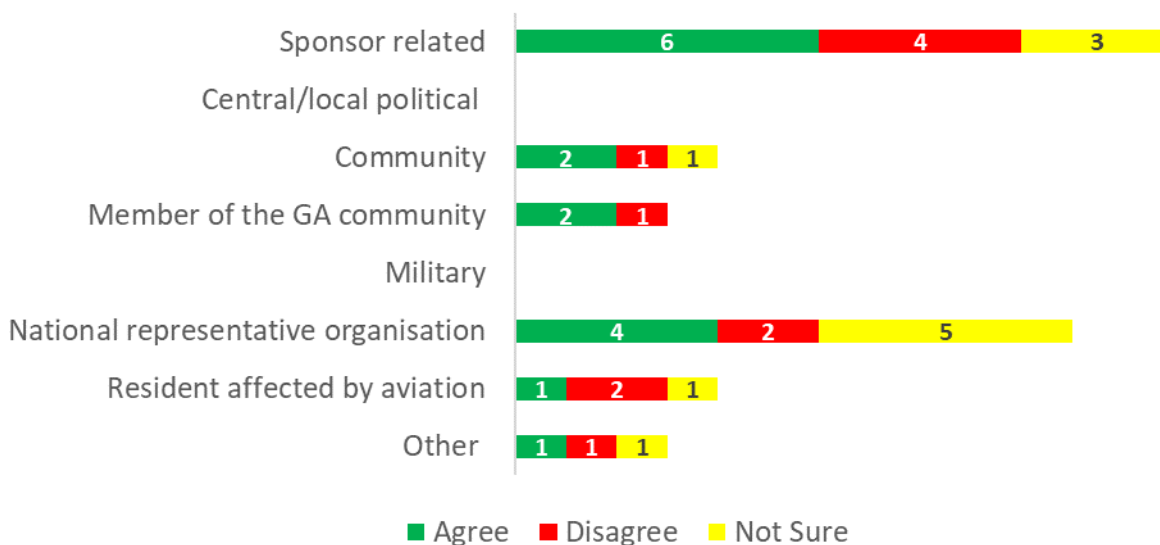
**Figure 56** - Question 35 Option 1: Provide flexibility with the development of Instrument Flight Procedures.

Option 1: Provide flexibility with the development of Instrument Flight Procedures	Agree	Disagree	Not Sure	Grand Total
Sponsor related	7	4	2	13
Central/local political	0	0	0	0
Community	0	3	1	4
Member of the GA community	3	0	0	3
Military	0	0	0	0
National representative organisation	3	2	6	11
Resident affected by aviation	0	3	1	4
Other	1	1	1	3
<b>Grand Total</b>	<b>14</b>	<b>13</b>	<b>11</b>	<b>38</b>

**Table 56** - Question 35 Option 1: Provide flexibility with the development of Instrument Flight Procedures.

3.8.7 The chart below (**Figure 57**) shows a breakdown of responses by stakeholder type in numbers for Option 2 (to develop and present an Instrument Flight Procedure design concept). 46% (6 out of 13) of Change Sponsors agreed with this option, in addition to 50% (2 out of 4) of community representatives and 66% (2 out of 3) of GA stakeholders. National representative organisations had the highest proportion of respondents who were not sure about this option (45%, 5 out of 11).

**Figure 57** 2. Develop and present an IFP design concept (respondent type by number for question 35)



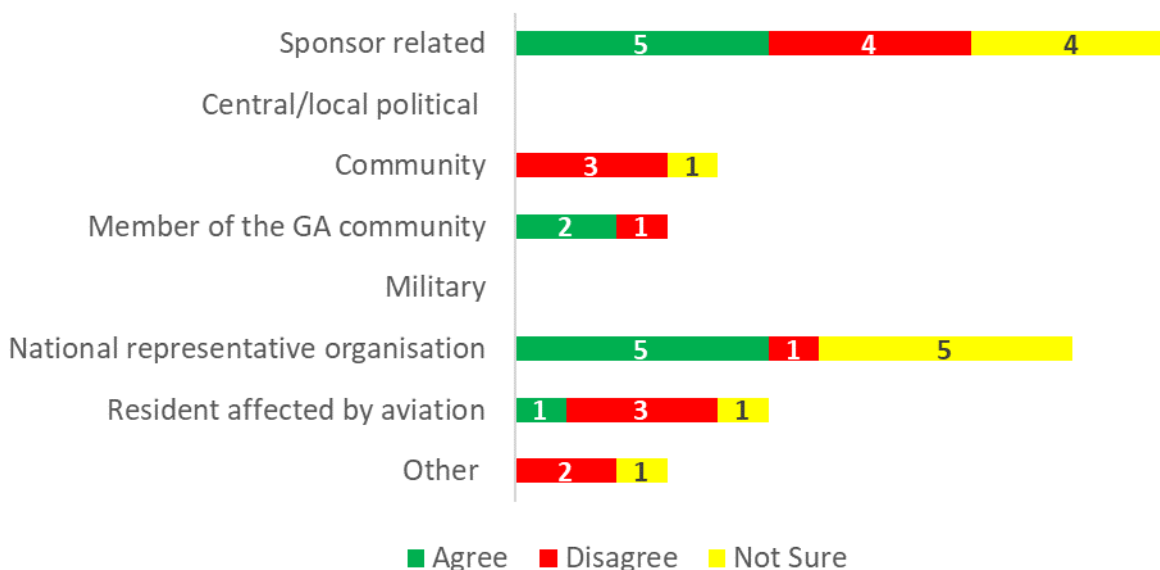
**Figure 57** - Question 35 Option 2: Develop and present an Instrument Flight Procedure design concept.

Option 2: Develop and present an Instrument Flight Procedure design concept	Agree	Disagree	Not Sure	Grand Total
Sponsor related	6	4	3	13
Central/local political	0	0	0	0
Community	2	1	1	4
Member of the GA community	2	1	0	3
Military	0	0	0	0
National representative organisation	4	2	5	11
Resident affected by aviation	1	2	1	4
Other	1	1	1	3
<b>Grand Total</b>	<b>16</b>	<b>11</b>	<b>11</b>	<b>38</b>

**Table 57** - Question 35 Option 2: Develop and present an Instrument Flight Procedure design concept.

3.8.8 The chart below (**Figure 58**) shows a breakdown of responses by stakeholder type in numbers for Option 3 (a mix between Options 1 and 2). There was an almost even split of responses from Change Sponsors, with 38% (5 out of 13) agreeing, 31% (4 out of 13) disagreeing and 31% (4 out of 13) being unsure. 75% (3 out of 4) of community representatives and 60% (3 out of 5) residents affected by aviation disagreed with this option.

**Figure 58** Option 3: A mix between Option 1 and 2 (respondent type by number for question 35)



**Figure 58** - Question 35 Option 3: A mix between Option 1 and 2

Option 3: A mix between Option 1 and 2	Agree	Disagree	Not Sure	Grand Total
Sponsor related	5	4	4	13
Central/local political	0	0	0	0
Community	0	3	1	4
Member of the GA community	2	1	0	3
Military	0	0	0	0
National representative organisation	5	1	5	11
Resident affected by aviation	1	3	1	5
Other	0	2	1	3
<b>Grand Total</b>	<b>13</b>	<b>14</b>	<b>12</b>	<b>39</b>

**Table 58** - Question 35 Option 3: A mix between Option 1 and 2

3.8.9 The chart below (**Figure 59**) shows a breakdown of responses by stakeholder type in numbers for Option 4. 66% (25 out of 38) of stakeholders disagreed with doing nothing in relation to clarifying Instrument Flight Procedure design requirements / expectations. Out of the 11% (4 out of 38) of respondents who agreed with doing nothing, 3 of these were residents affected by aviation, with the other respondent identifying as a Change Sponsor.

**Figure 59** 4. Do Nothing (respondent type by number for question 35)



**Figure 59** - Question 35 Option 4: Do Nothing

Option 4: Do nothing	Agree	Disagree	Not Sure	Grand Total
<b>Sponsor related</b>	1	10	2	13
<b>Central/local political</b>	0	0	0	0
<b>Community</b>	0	2	2	4
<b>Member of the GA community</b>	0	2	0	2
<b>Military</b>	0	0	0	0
<b>National representative organisation</b>	0	8	3	11
<b>Resident affected by aviation</b>	3	1	1	5
<b>Other</b>	0	2	1	3
<b>Grand Total</b>	4	25	9	38

**Table 59** - Question 35 Option 4: Do Nothing

3.8.10 Open text responses to the consultation questions regarding clarifying Instrument Flight Procedure design requirements/expectations gave some insight into why stakeholders responded in the way that they did to the options presented for Question 35.

3.8.11 Qualitative data for Option 1 regarding providing flexibility with Instrument Flight Procedure development is considered first in this section. Those who agreed with this option welcomed the flexibility that conducting the flyability assessment earlier in the Airspace Change Process could provide:

***“For most ACPs, IFPs are intrinsically linked to the design of the airspace. Having flexibility to make sure that the design will be viable should be confirmed at the earliest opportunity.”*** **Change Sponsor – Air Navigation Service Provider.**

***“The ability to test flyability early in the process would seem to be a flexible and practical approach to the design requirements and would quickly weed out the weak options.”*** **National representative organisation.**

- 3.8.12 One Change Sponsor drew on their experiences of airspace change in advocating their support for conducting the flyability assessment earlier in the Airspace Change Process:

***“(We) have previously undertaken IFP flyability (at risk) earlier in the process as (we) have previously implemented a change which did have IFP issues, and our operators are eager to be involved to avoid this in the future.”*** **Change Sponsor – Airport.**

- 3.8.13 The view was expressed that focussing on Instrument Flight Procedures earlier would enable stakeholders to form a better understanding of proposed procedures:

***“It is normally IFP that drives airspace design, not the other way around, so it would seem logical to focus more on that earlier in the process. It is also important for stakeholders to form a better understanding of the actual procedures sponsors wish to contain within CAS.”*** **National representative organisation.**

- 3.8.14 Some stakeholders felt that considering Instrument Flight Procedure flyability earlier should not be made a requirement but be utilised at the Change Sponsor’s discretion.

***“I’m sure those sponsors with sufficient resources would have already looked at the flyability of the design. This should not be mandated but where it is used it should enable options to be discounted because they cannot be safely or efficiently flown perhaps.”*** **Change Sponsor – ANSP and Airports.**

- 3.8.15 If imposed as a requirement, concerns were expressed at the additional costs and burden that would result for Change Sponsors.

***“This is already within the gift of a sponsor, and it doesn’t require any imposed flexibility by the CAA. The judgement to conduct validation early on is a cost/benefit assessment for the sponsor to take. Early in the process there may be many more routes from which a final design(s) will be***

***eventually chosen. Deciding which to assess in the simulator at this point is likely to be impractical. Additionally, given the fact that the design will be produced by an APDO, it will be flyable and safe and early simulation is only likely to give an indication of concentration and dispersion. Again, as this will have to be done at Stage 5 anyway, there would be no benefit from doing this earlier.*** [Change Sponsor - Airspace change consultancy.](#)

***“Airspace sponsors already undertake early IFP activities as an option if necessary; making it a requirement at all stages adds to the cost of the ACP. It would then be additional burden if we were required to then justify our reasons for not doing this. There are no benefits to sponsors of an IFP locked down early in the process.”*** [Change Sponsor - Air Navigation Service Provider.](#)

- 3.8.16 One Change Sponsor highlighted a risk that that consideration of Instrument Flight Procedure flyability earlier could be viewed as pre-determining the outcome:

***“This could also be perceived as predetermining the outcome before a full set of options have been developed. PANS-OPS already defines broad flyability, and engagement with airlines will support and refine this understanding further.”*** [Change Sponsor – Airport.](#)

- 3.8.17 We analysed qualitative data regarding the second Instrument Flight Procedures option that Change Sponsors develop and present an Instrument Flight Procedure design concept to the CAA prior to development of Design Options.

- 3.8.18 Support for this option was provided by a consultee who could see the benefit of it in anticipation of airspace developments regarding new entrants:

***“Within the next three years, we anticipate the introduction of low-level Advanced Air Mobility (AAM) air taxi operations for which IFP designs will need to be developed. Given the huge degree of uncertainty (both in acceptability and flyability) for both designers and the Regulator, we would support option 2 in which concepts and options are discussed with the CAA prior to consultation”.*** [National representative organisation.](#)

- 3.8.19 The same consultee made a request for the CAA to develop guidance to reflect the evolving airspace environment:

***“...given the evolving and changing needs of the market, we support the development of specific guidance (as an addendum to CAP 1616) that can aid both applicants and the regulator as our combined understanding develops.”*** [National representative organisation.](#)



- 3.8.20 The proposal was welcomed if it was intended to reduce the number of Design Options:

***“If the proposal...is intended to reduce the number of options from the current test of a “comprehensive” list (which we believe is excessive) to a lower test of a “realistic” list, this option is sensible and helpful”.*** [Change Sponsor – Airspace change consultancy.](#)

- 3.8.21 One APDO felt that some benefits could be realised in terms of cost and helping to de-risk the design process but that it would only be viable if sufficient Instrument Flight Procedure resource could be provided by the CAA:

***“Producing a simple design concept early on would be of value only if it considers technical factors and the CAA has capacity to ensure an IFP Regulator provides comment. This would help de-risk design decisions early in the process which could help to offset unnecessary cost later in the process”.*** [Change Sponsor - Airspace change consultancy.](#)

- 3.8.22 The CAA’s statement in the consultation document, that an identified impact of presenting a developed Instrument Flight Procedure design concept prior to development of Design Options would result in a much longer design process than is currently the case, was challenged by one Change Sponsor whose view was that the Instrument Flight Procedure activity could be conducted in parallel:

***“Why would the process be “much longer than it currently is”? Such activity would be conducted in parallel. Where would the hold-up be, with the sponsor or the Regulator looking to verify the IFP designs?”*** [Change Sponsor – ANSP and Airports.](#)

- 3.8.23 However, another consultee agreed that the design process would take longer:

***“Option 2 sounds like another (unnecessary) regulatory step. It would make the process longer, more costly and restricts flexibility – all as acknowledged by the CAA.”*** [National representative organisation.](#)

- 3.8.24 As for the first Instrument Flight Procedure option, comment was made regarding whether developing the Instrument Flight Procedure concept earlier should be a mandatory requirement or placed at the discretion of the Change Sponsor:

***“It should not be mandatory where the process would be lengthened or costs at risk apparent. However, if the IFP design at an early stage is to be mandated, then this option would not be viable for some sponsors.”*** [Change Sponsor.](#)

- 3.8.25 Some stakeholders took the view that an Instrument Flight Procedure design should be presented at a later stage:

***“Stage 1 is too early. It would be better for an IFP Design Concept to be submitted at Stage 2, based on some of the options with a list of questions from the IFP Designer to the CAA that the IFP department must answer.”***  
**Change Sponsor - Airspace change consultancy.**

- 3.8.26 In response to the do-nothing option presented at consultation, stakeholders pointed out the risks for the Change Sponsor where Instrument Flight Procedure concerns are not highlighted earlier in the Airspace Change Process:

***“Do nothing – No the CAA must do something. We need the IFP department to answer questions and raise any concerns earlier in the process, and they need to do this without a full IFP design submission package to assess. It is not fair on sponsors to end-load the process with all this risk.”*** **Change Sponsor - Airspace change consultancy.**

- 3.8.27 Some stakeholders made general observations regarding Instrument Flight Procedures citing a lack of feedback on Instrument Flight Procedure issues and minimal mention of the Instrument Flight Procedure process in CAP 1616. There were requests from some stakeholders to discuss Instrument Flight Procedure considerations with the CAA in more detail, for example via a technical workshop. This was mentioned from the perspective of complex Airspace Change Proposals, new entrant vehicles and for windfarm developments.

### **CAA response on clarifying Instrument Flight Procedure design requirements / expectations (Questions 35 and 36)**

- 3.8.28 Consultation feedback on conducting the flyability assessment earlier in the Airspace Change Process remains under consideration. If we decide to proceed with this option, we will build content into the suite of Guidance Documents.
- 3.8.29 The options regarding developing and presenting an Instrument Flight Procedure design concept earlier in the Airspace Change Process and the possibility of a mix of this option with conducting the flyability assessment earlier are also being considered further. If these options are progressed, we do not intend to mandate additional work for Change Sponsors or change the current Airspace Change Process but improve it by achieving the same outcome in a more proportionate manner. The Change Sponsor will be able to align two processes where the requirements of those processes overlap. This may provide an opportunity for Change Sponsors to make savings in both effort and cost. We will not know intrinsically if the final design will work but we will have a better degree of confidence in what is being developed.

- 3.8.30 We will provide guidance regarding Instrument Flight Procedure criteria, compliance, and requirements within our Guidance Documents. It will remain the case that final decisions on Instrument Flight Procedures will be taken at Stage 5. The delivery of an Instrument Flight Procedure technical workshop will be considered as part of our plans to provide training on CAP 1616 to our stakeholders.

## 3.9 Temporary Airspace Change Proposals / Airspace Trials

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- 3.9.1 The last theme presented at consultation sought feedback on the Temporary Airspace Change Proposals and Airspace Trials processes. Our analysis of survey questions 37 to 39 are presented in this section.
- 3.9.2 Respondents were asked for their views on the removal of references to 'consultation' from the Temporary Airspace Change Process, noting that there is no proposal to remove the requirement to 'engage' with aviation stakeholders.
- 3.9.3 Change Sponsors including the military stakeholder generally supported the proposal to remove the references to consultation, from the Temporary Airspace Change Process, acknowledging consultation has a legal meaning and that it requires a lot more resource. Change Sponsors stated that targeted engagement should remain an important requirement. They felt that this engagement would be proportional to the short-term nature of temporary changes and would be sufficient to provide transparency to other airspace users and drive the redesign of the temporary danger area if necessary.

***“Content for consultation to be removed from temporary changes. It is not necessary or required for temporary airspace changes for consultation to take place, what is required is that adequate stakeholder engagement is carried out.”*** [Change Sponsor – Airport.](#)

- 3.9.4 The transition of Temporary Airspace Change Proposals to Permanent Airspace Change Proposals was a key concern for some stakeholders. Where this was a possibility, residents affected by aviation and community representatives disagreed with the removal of any references to consult as part of the Temporary Airspace Change Process. Other community representatives and residents affected by aviation felt that any airspace change that could impact communities should be consulted on, whether Temporary or Permanent.

***“We reject the suggestion that communities should not be consulted on a temporary airspace change because such a consultation would be disproportionate. It is the responsibility of sponsors to act within the Government Guidelines and communities have had some nasty surprises sprung on them from sponsors who have not done adequate research...”***  
[Resident affected by aviation.](#)

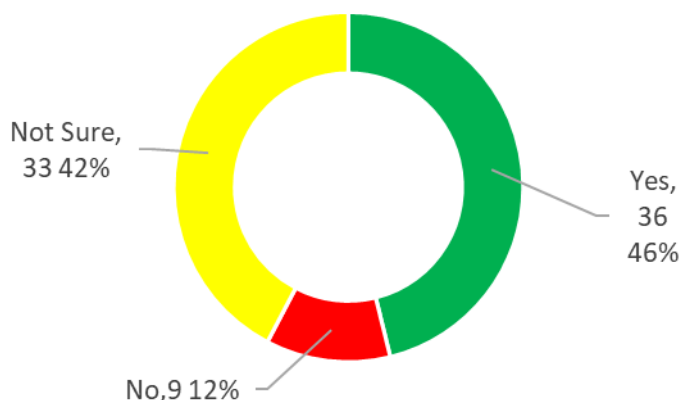
***“It is important that communities be consulted on temporary airspace changes – noise, CO2, air quality and tranquillity are all highlighted as aspects that can be impacted. These are real changes for people that may be felt over a number of months.”*** **Community noise group.**

- 3.9.5 A member of the GA community felt that engagement doesn't actively encourage views from GA stakeholders and thought that consultation would be more appropriate. Some community representatives strongly felt that even if consultation is not required the Change Sponsor should take reasonable steps to inform communities of what is being proposed and the reasons why to ensure transparency.

**CAA response on removing references to ‘consultation’ within the Temporary Airspace Change Process (Question 37):**

- 3.9.6 To support the application of proportionality, we will remove references to ‘consultation’ from the Temporary Airspace Change Process to align with the short-term nature of Temporary Airspace Change Proposals. The existing requirements for targeted engagement for Temporary Airspace Change Proposals will remain and will be discussed in detail at the assessment meeting. Where a Change Sponsor identifies an impact on communities, the requirement to inform communities on what change is taking place and why, and also on the likely impacts while it is in operation, will remain. This is in line with the Air Navigation Guidance 2017 which states that where a temporary change to the airspace design would affect the distribution of traffic below 7,000 feet, it is vital that the communities that may be affected are informed prior to the change being implemented. Where a Temporary Airspace Change Proposal leads to a Permanent Airspace Change Proposal, the Change Sponsor will still be required to follow the full Permanent Airspace Change Process, which includes a consultation.
- 3.9.7 Question 38 of the consultation survey asked respondents to provide their views on the criteria for determining whether communities are affected and the requirement to inform them accordingly.

**Figure 60** Question 38 regarding 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?



**Figure 60** - Question 38 - Temporary Airspace Changes / Airspace Trials

3.9.8 The chart above (**Figure 60**) shows that 46%, 36 out of 78) of respondents agreed with the proposal and a slightly lower percentage 42% (33 out of 78) were not sure, whereas 12% (9 out of 78) of respondents disagreed.

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	Grand Total
<b>Number</b>	36	9	33	78

**Table 60** - Question 38 - Temporary Airspace Changes / Airspace Trials

3.9.9 The chart below (**Figure 61**) shows a breakdown of responses by stakeholder type in numbers for the above question. Central/local political representatives had the highest proportion of respondents (80%, 4 out of 5) agreeing with replicating the requirements of Airspace Trials onto the Temporary Airspace Change Process. 60% (9 out of 15) of community representatives agreed, in addition to 50% (4 out of 8) of GA stakeholders and 40% (6 out of 15) of national representative organisations. Of the 9 respondents who disagreed, 33% (3 out of 9) of these were Change Sponsors.

**Figure 61** Regarding 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?



**Figure 61** - Question 38 - Temporary Airspace Changes / Airspace Trials

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	Grand Total
<b>Sponsor related</b>	7	3	9	19
<b>Central/local political</b>	4	1	0	5
<b>Community</b>	9	0	6	15
<b>Member of the GA community</b>	4	0	4	8
<b>Military</b>	0	1	0	1
<b>National representative organisation</b>	6	0	9	15
<b>Resident affected by aviation</b>	6	2	5	13
<b>Other</b>	0	2	0	2
<b>Grand Total</b>	36	9	33	78

**Table 61** - Question 38 - Temporary Airspace Changes / Airspace Trials

3.9.10 Respondents were asked to provide their views on proposals to broaden the noise assessments for Temporary Airspace Change Proposals/Airspace Trials (where a Permanent Airspace Change Proposal is likely to follow), which, if implemented, the environmental factors required for a Permanent Airspace Change Proposal

(including CO<sub>2</sub>, local air quality and tranquillity) would be required. Respondents were asked how this proposal will impact them (positively or negatively).

- 3.9.11 There was a lot of support for the proposal to broaden noise assessments for Temporary Airspace Change Proposals/Airspace Trials where a Permanent Airspace Change Proposal is likely to follow. Residents affected by aviation and community representatives wanted noise to be considered and assessed more robustly for all types of airspace changes.

***“Increasing scrutiny of cumulative impacts is a positive thing, if these are robustly assessed” Resident affected by aviation.***

***“All changes temporary or otherwise must be assessed as if they were permanent” Councillor or MP.***

***“It seems right to apply the same standards to temporary proposals/trials as to proposals for permanent change.” National representative organisation.***

***“...We are strongly in favour of, 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, the CAA broadening 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, biodiversity and tranquillity. We note that, and do not accept that, the current environmental assessment requirements only include noise, on the basis that other environmental impacts are negligible over a short-term.” Local representative organisation.***

- 3.9.12 Community representatives felt that carrying out the assessments at the beginning of the temporary change or trial would be valuable to determine any impacts if the change were to become Permanent.

***“If a temporary airspace change, or flight trial, is being conducted with a view to it possibly becoming the subject of an application for permanent change, then there is value in gaining information and understanding of its impacts so these can be taken into account in a later ACP.” Community noise group.***

- 3.9.13 A member of the GA community said that the broadening of noise assessments for temporary changes was welcomed, but only if the assessments at this stage are as robust as they would be for a Permanent Airspace Change Proposal.

***“Temporary airspace should not be a shortcut method to getting permanent airspace. If broadening the requirements at the temporary stage will mean***

***less careful assessments when attempting to make the airspace permanent, this would be a bad idea.”*** [Member of General Aviation community.](#)

- 3.9.14 Change Sponsors voiced that the requirements for Temporary Airspace Change Proposals and Airspace Trials should be scaled, since not all Temporary Airspace Change Proposals or Airspace Trials lead to a Permanent Airspace Change Proposal. Generally, Change Sponsors felt that the additional environmental requirements should only be completed at the stage that a change is to become Permanent, meaning that if a trial was unsuccessful for example, additional resource used to comply with increased requirements will not have been expended.

***“We do not support the inclusion of new requirements and criteria, as it might impact the ability to trial potential benefits, by increasing the effort and cost related to a trial. As the need arises (i.e., if the change becomes permanent), environmental assessment will be undertaken covering the noise assessment requirements, so we believe there is no need to introduce this requirement any earlier.”*** [Change Sponsor – Airport.](#)

***“[Change sponsor – Airport] would not support this, as sponsors should be encouraged to undertake trials for innovation in line with the AMS. By adding additional assessments for a trial this could increase the burden on change sponsors and also increase the time and cost. We believe it should be easy for change sponsors to trial new procedures and then if a trial was to become permanent, a full ACP analysis can be completed.”*** [Change Sponsor – Airport.](#)

***“There should be no requirement to introduce additional noise assessments for temporary ACPs or trials as this would introduce another layer of risk... If the trial was unsuccessful, unnecessary cost would have been expended and any increased requirements could reduce plans for future trials owing to increased risk.”*** [Change Sponsor – Airport.](#)

- 3.9.15 Another Change Sponsor wanted clarity as to whether the environmental requirements would be broadened for Temporary Airspace Change Proposals or Airspace Trials where there is not an intention to make the change Permanent.

***“If the temporary change or a trial is to inform permanent change, it makes sense. If it is purely a temporary change for an operational reason, this will be too unwieldy. We think the two should be separated.”*** [Change Sponsor – Airport.](#)

- 3.9.16 Another Change Sponsor felt that the broadening of requirements would only be proportionate for certain changes and suggested that if a temporary change or trial is to become Permanent, the CAA could give the Change Sponsor a time period within which to complete the additional environmental assessments before the change can become Permanent.



***“Producing a 65db LAmax for a temporary ACP which may only last 90 days is a great deal of work and potentially not proportionate for all changes. This assumes the temporary change involves airports who can generate a 65dB LAmax contour. What if this is for Gliders or something that doesn't generate 65dB at ground level? This would be a lot of work which would be nugatory if the sponsor doesn't progress a permanent change. Perhaps it would be better to say that if an extension to the trial/change is progressed it is at that point the additional env assessments are needed where appropriate. Even if you give them a period to do this. E.g., a trial is for 3 months, after 2 months the sponsor requests extension for 18 months to progress a permanent change, then the CAA gives them an extension for 3 months within which time the sponsor needs to do the environmental assessments before they permit the additional 15 months.”*** [Change Sponsor – Airspace change consultancy.](#)

- 3.9.17 A military stakeholder disagreed with the proposal, expressing that broadening the noise assessment requirements would have a significant impact on being able to implement Temporary Airspace Change Proposals to meet emerging defence requirements at relatively short notice. They voiced that even if a Temporary Airspace Change Proposal is to be made Permanent, the Permanent airspace design may be different and therefore further analysis would be required at this point anyway, resulting in duplication of work if the proposal to broaden noise assessments for temporary changes was implemented.

***“[Military stakeholder] strongly opposes. The resource required (financial and time) can be significant and is not proportionate when considering temporary ACPs, which often are required for implementation within a relatively short timescale to meet emerging Defence requirements. Even when a subsequent permanent change is anticipated, it may not be known if the permanent airspace design will be the same. Experience of the temporary airspace may then influence the permanent airspace design, and analysis would then need to be carried out separately for both ACPs. Potential use of an abridged ACP process for permanent airspace following temporary structures has been rejected, so there is no opportunity for sponsors to get any benefit from carrying out the analysis during the temporary ACP. This proposed change would have a significant impact on ...”*** [Military.](#)

- 3.9.18 Some Change Sponsors questioned whether the noise criteria are relevant for RPAS/UAS proposals. One Change Sponsor suggested that the additional environmental requirements should only be carried out if a change was to become Permanent and issues were raised during the temporary/trial phase.

***“Are the noise criteria relevant for RPAS, which are relatively unobtrusive platforms?”*** [Change Sponsor – Unmanned Aerial Systems \(UAS\)/Remotely Piloted Aircraft Systems \(RPAS\).](#)

***“...This is not relevant for the likes of UAS. Surely the need to broaden environmental assessment requirements for a permanent change should only apply if issues were raised during the temporary/trial phase. If none were raised, then it would be overly burdensome and unnecessary to require sponsors to broaden the assessment without any justification that is related to the specific change. A more flexible and streamlined approach is needed, not one that is more complicated and confusing for all concerned.”*** [Change Sponsor – Unmanned Aerial Systems \(UAS\) /Remotely Piloted Aircraft Systems \(RPAS\)](#).

- 3.9.19 Community representatives and central/local political organisations felt strongly that the appropriateness of current noise measurements should be looked at for all types of airspace changes.

***“The choice of noise metrics for any airspace trials or change processes, whether temporary or not, should be appropriate to the circumstances. Residents close to a runway are affected differently to residents further out but affected by aircraft being held low, or residents who have not experienced aircraft overflight but become subject to it. In each case, multiple metrics including LAeq, LAmax, N-above, numbers of flights and when they occur in the day or night should be considered and an appropriate comparison made before and after. Because a temporary airspace change may become permanent, it is essential to approach it with the same assessment rigour as that applied to permanent airspace change.”*** [Central or local government body](#)).

***“We agree with broadening noise assessments. We feel a range of metrics should be used not just 65dB LMAX for temporary changes”*** [Other](#)

***“It is essential that N>65/70/75 dB LAmax as well as single mode metrics are used as key measures in relation to the assessment of all temporary and permanent airspace changes. A single metric does not adequately describe the impacts of aviation noise, so suitable metrics should be used according to the nature and scale of the proposed change.”*** [Local representative organisation](#).

- 3.9.20 Some community representatives expressed the difficulties they face understanding noise metrics and felt that there should be improved clarity of noise measurements for residents.

***“Noise is always subjective. No matter how comprehensive the data collected by a trial/temporary ACP, this data is rarely understood.”*** [Other - Airline](#)

***“Average LAeq or SEL metrics are not understood by the great majority of those affected.”*** [Local representative organisation](#).

***“Introducing the requirement to use 65 dB LAmax footprint would provide some transparency for affected communities. Broadening the noise assessments and including environmental assessments for air quality, as previously stated, currently there is no data for Lower Airspace emissions, what they are expected to be with increased traffic capacity or what is an acceptable level. There appears to be conflicting information, from various agencies, in respect of damage to communities on the ground.” Councillor or MP.***

***“Change in noise metric would help to understand the full impact of airspace change whether that be temporary or permanent. Although an average of noise is never acceptable as residents do not hear noise as an ‘average’. Noise events would be preferable. The noise metrics seem due for an update as SONA, even with the updates, seems not to capture the true impacts of aircraft noise.” Community noise group.***

***“Broadening (in a more rigorous and accurate sense) the noise assessments required for temporary ACPs/trials is to be welcomed. This is especially the case if a permanent change is likely to follow. It is important that a threshold of at least 65 dB LAmax is used as well as single mode metrics in examining noise footprints for all temporary and all permanent airspace changes. Communities have put forward arguments to examine levels at 65/70 and 75 dB LAmax to try to get a more accurate understanding of noise impacts. LAmax is a better metric than LAeq averages which have proven insensitive to actual experience. Noise metrics in total are a very complex topic for people to grasp.” Local representative organisation.***

**CAA response on replicating the requirements of the Airspace Trials process onto the Temporary Airspace Change Process, i.e. Should we introduce the requirement to use 65 dB LAmax footprints within the Temporary Airspace Change Process? (Question 38):**

3.9.21 To align with feedback received and to ensure consistency of environmental requirements across the Temporary Airspace Change Proposal and Airspace Trials processes, we will introduce the requirement to use 65 dB LAmax for day flights and 60 dB LAmax for night flights for Temporary Airspace Change Proposals. These criteria will be detailed within the new Guidance Document for Temporary Airspace Change Proposals and Airspace Trials will apply to all Temporary Airspace Change Proposals or Airspace Trials, regardless of the type of Change Sponsor.

**CAA response on broadening noise assessment requirements for a Temporary Airspace Change Proposal/Airspace Trial where a Permanent Airspace Change Proposal is likely to follow (Question 39):**

- 3.9.22 As per 3.9.21, we will introduce the requirement to use 65 dB LAmax for day flights and 60 dB LAmax for night flights for the Temporary Airspace Change Process. Other than this, to support proportionality, we will retain the current requirements relating to noise assessments for a Temporary Airspace Change Proposal/Airspace Trial. However, if a Change Sponsor wishes to extend a Temporary Airspace Change Proposal or Airspace Trial beyond the originally agreed end date, the CAA will assess whether the rationale for doing so is appropriate. If so, the CAA will assess whether the initial engagement by the Change Sponsor remains valid and whether it should be augmented. At this point, the CAA will evaluate if further assessment is required.
- 3.9.23 The new Guidance Document for Temporary Airspace Change Proposals and Airspace Trials will include the relevant details on the noise metrics required to provide clarity and transparency with regards to noise assessments for all stakeholders.

### 3.10 Feedback on options rejected prior to consultation

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- 3.10.1 Within the consultation, we detailed options that had been rejected following a series of engagement activities with internal and external stakeholders. The consultation provided a further opportunity for us to seek feedback on these rejected options and invite stakeholders to explain any positive or negative impacts or effects that may result from the removal of any of the options described.
- 3.10.2 Stakeholders used the free text option for question 40 to comment on options that we had rejected prior to consultation, to comment on options presented at consultation and to re-iterate feedback expressed at earlier stages in the survey. Dissatisfaction was expressed by community stakeholders at the proposal for communities not to be consulted on Temporary Airspace Change Proposals and comments made have been captured earlier in this report.
- 3.10.3 Stakeholders expressed views on Airspace Trials:

***“A full consultation must take place before a trial is allowed. Full environmental studies must be completed throughout the trial, and this can be no longer than 6 months.”*** [Community noise group](#).

***“We believe sponsors of trials should be required to engage with potentially impacted communities as well as industry stakeholders.”*** [Local representative organisation](#).

- 3.10.4 Feedback was received regarding the decision not to progress the introduction of an abridged Airspace Change Process for Change Sponsors wishing to pursue a Permanent or long-term arrangement beyond Temporary Airspace Change Proposals and Airspace Trials. While some welcomed this decision there was a request for further detail on how outputs from a Change Sponsor’s Temporary Airspace Change Proposal could be used to scale requirements of the Permanent Airspace Change Process:

***“We would welcome further details on how the CAA intends to recognise the outputs from a temporary ACP/airspace trial, how these could be used to support the development of a permanent ACP, and how change sponsors could claim the scaling down of certain requirements.”*** [Other – UAS Operator and UTM service provider](#).

- 3.10.5 Other stakeholders asked for this decision to be re-considered:

***“I believe this should be revisited as an option, as this has the potential to reduce the resource burden, both for ACP sponsors and the CAA.”*** [Military](#).

***“Abridged process – this should be developed. If a trial has been developed in accordance with (CAP) 1616, run correctly, reported impacts correctly etc., it is not helpful to have to go backwards into Stage 1.”*** [Change Sponsor – Airport.](#)

***“...It is important that where a temporary ACP or trial were successful that some form of reduced process could be considered subject to a full consultation with stakeholders and complete noise surveys.”*** [Change Sponsor.](#)

- 3.10.6 There was a request for detail of any potential areas for scaling for a Permanent Airspace Change Proposal following a Temporary Airspace Change Proposal to be clearly set out within the updated CAP 1616:

***“It is key that relevant inputs and outputs of the temporary ACP/trial are effectively used to scale down the requirements for a permanent ACP in order to streamline and minimise the burden on all involved (CAA, sponsors and stakeholders). This needs to be clearly stated and explained in an updated CAP 1616 to avoid any elements still applicable from the temporary ACP/trial application being ignored or duplicated in the permanent ACP application.”*** [Change Sponsor.](#)

- 3.10.7 One consultee considered the CAA’s reasons for rejecting introduction of an arbitration service to help resolve fundamental disagreements between Change Sponsors and stakeholders as being fundamentally flawed:

***“First, the CAA can and should offer a service to help resolve fundamental disagreements by clarifying CAP 1616 requirements. Second, change sponsors are profoundly conflicted when dealing with stakeholders’ concerns – being committed to delivery as the sponsor of the changes. They are absolutely not best placed to manage conflicts with stakeholders.”*** [Local representative organisation.](#)

- 3.10.8 One consultee said regarding the Design Principle Evaluation proforma:

***“Getting rid of the DPE proforma is a bad idea. It takes away consistency even though it is a difficult document to get consistent”.*** [Change Sponsor – Airport.](#)

#### **CAA response on rejected high-level proposals (Question 40):**

- 3.10.9 Some stakeholders requested that the CAA reconsider introducing an abridged Airspace Change Process for Permanent Airspace Change Proposals which follow Temporary Airspace Change Proposals or Airspace Trials. We do not consider

that is appropriate because the requirements for a trial or temporary proposal are scaled and so it is not possible for there to be a seamless transition between the two. While Change Sponsors will still be required to follow the requirements set out within the Permanent Airspace Change Process, we will acknowledge that they may be able to use what they have learned from their Temporary Airspace Change Proposal or Airspace Trial to inform the development of their Permanent Airspace Change Proposal.

- 3.10.10 If the Change Sponsor of a Temporary Airspace Change Proposal or an Airspace Trial seeks to propose a Permanent Airspace Change Proposal, there will remain a requirement for the Change Sponsor to follow the Permanent Airspace Change Process from the beginning. We do not consider that is appropriate to introduce an abridged Airspace Change Process for Change Sponsors wishing to progress a Permanent Airspace Change Proposal beyond a temporary change or Airspace Trial. Change Sponsors may be able to use what they have learned from the Temporary Airspace Change Process to inform their Permanent Airspace Change Proposal, but they will still be required to follow the requirements set out within the Permanent Airspace Change Process.
- 3.10.11 We will not be providing specific guidance on how outputs from a temporary change or Airspace Trial could be used to scale requirements of the Permanent Airspace Change Process because it will depend on the unique circumstances related to each Airspace Change Proposal. While we are unable to provide generic guidance on this point, we will ensure that it is discussed with the Change Sponsor on a case-by-case basis during the assessment meeting for their Permanent Airspace Change Proposal.
- 3.10.12 We will not be introducing an arbitration service. This is because the CAA's role in the Airspace Change Process is as a regulator and to fulfil its regulatory role objectively, we need to maintain an appropriate distance from the Change Sponsor and their stakeholders. It is the Change Sponsor's responsibility to ensure they engage with their stakeholders in a transparent and proportionate way, and it is the CAA's responsibility to assess whether the Change Sponsor has done so in accordance with the requirements of the Airspace Change Process. Change Sponsors own and possess knowledge about the relationships with their local stakeholders and are therefore best placed to manage any conflicts that may arise.
- 3.10.13 While we acknowledge related stakeholder concerns, we will continue to require Change Sponsors to use the standardised format for the design principle evaluation on the basis that it provides a consistent way for the Change Sponsor to present a summary of each design option and the assessment of it against the Design Principles. Also, this format has been utilised since the implementation of

CAP1616 and is therefore well established. That being said, we will consider the provision of additional guidance on its purpose and function.

- 3.10.14 Some consultees were dissatisfied with the rejection of a high-level proposal to require Change Sponsors of Temporary Airspace Change Proposals and Airspace Trials to engage with community stakeholders to ensure they had the opportunity to influence the development of the proposal. It was also suggested that full consultation should be required before an Airspace Trial is permitted. Given the short-term nature of Temporary Airspace Change Proposals and Airspace Trials, we maintain that the current engagement requirements are proportionate. The Change Sponsor is also required to collate, monitor, and report to the CAA on the level and contents of complaints related to the implementation of the Temporary Airspace Change Proposal or Airspace Trial, and if there is any suggestion that the results are not as anticipated, the CAA will investigate urgently and act appropriately.



### 3.11 Stakeholder suggestions for additional options

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- 3.11.1 At question 41 of the consultation survey we gave stakeholders an opportunity to suggest any additional options and provide their rationale in support.
- 3.11.2 Community stakeholders and local authorities alike wanted to see options for **improved environmental metrics** to measure the impact of aircraft noise on communities. They viewed average LAeq measurements unfavourably as they feel it does not fully reflect community impacts (especially when an airspace change involved what was referred to as new LAeq paths or expansion). They called for the use of multiple metrics to be agreed via consultation with all stakeholder groups to provide more comprehensive assessment of noise. One local authority wanted to see greater use of overflight metrics to better represent how communities perceive annoyance.

***“The use of a single metric may not be sufficient to accurately capture the complexity and variability of aircraft noise and its impact on communities...It may be necessary to use a combination of metrics to provide a more comprehensive assessment”*** [Community noise group](#)

- 3.11.3 Those representing communities made a number of recommendations to enhance their understanding and participation in the Airspace Change Process. There was a call for **independent technical advice** to be made available to community stakeholders, recognising that even those directly affected by airspace change find it complex and difficult to understand the duties placed on the Change Sponsor in the Airspace Change Process.

***“...it is essential for communities to have access without cost to a reasonable level of independent advice and expertise in this increasingly complex area. Relying on volunteers to become familiar with large and complex technical documents and to provide meaningful feedback on extended and complex procedures which deliver benefits to the aviation industry, with no resources, is unreasonable.”*** [Community noise group.](#)

- 3.11.4 Many Change Sponsor related stakeholders wanted to see flexibility in the Airspace Change Process for those **Airspace Change Proposals with multiple Change Sponsors** (with particular reference to FASI-related Airspace Change Proposals). One Change Sponsor-related consultee suggested the opportunity to add or discount options after (the current) Stage 2 of the Airspace Change Process. Another consultee wanted to see a singular airspace designer with one active consultation with stakeholders on such Airspace Change Proposals.
- 3.11.5 One consultee discussed the role of simulations in the Airspace Change Process as a potential consideration:

***“More comprehensive simulation of proposed changes including, if possible, Fast Time Computer Simulation and Air Traffic Controller simulation input.” National Representative Organisation.***

- 3.11.6 Both GA and Change Sponsor-related stakeholders wanted to see a more defined way of understanding whether an airspace change had secured the most efficient use of airspace, particularly regarding minimising the volume of controlled airspace. One GA consultee called for this requirement to be a mandatory design principle. A Change Sponsor-related consultee also recognised the need for controlled airspace to be given consideration under the AMS:

***“[GA Stakeholder] strongly supports the inclusion of the Design Principles below [about controlled airspace], as mandatory/core requirements...As Design Principles, they are currently ‘tucked away’ where change sponsors and airspace designers are unlikely to be aware of them or give them their intended significance.” Member of the General Aviation Community.***

***“...Under AMS incorporation of ICAO rules, it would be appropriate to introduce an option to determine the requirement for Controlled Airspace.” Change Sponsor – Airport.***

- 3.11.7 Consultees representing Change Sponsors were also keen to avoid restarting or repeating a part of the Airspace Change Process if they are midway through the process when new guidance is issued:

***“Changes made as a result of this consultation should not be applied retrospectively. If a gateway has been passed that decision should stand regardless of any changes made to CAP 1616...” Change Sponsor – Airspace change consultancy.***

- 3.11.8 Consultees representing the RPAS community were keen to discuss additional suggestions for **Temporary Airspace Change Proposals and Airspace Trials**. They wanted to see more facilitation for their industry either through a simplification of the Airspace Change Process, removal of TDAs altogether and rapid gathering of the benefits of Temporary Airspace Change Proposals.

- 3.11.9 Responses to the feedback raised within question 41 are provided alongside the responses to question 42 in the text below. Due to the amount of feedback received in this section of the consultation, the analysis and responses have been presented within themes.

- 3.11.10 Lastly, at question 42 of the consultation we gave stakeholders an opportunity to share any other comments with regards to the Airspace Change Process. A wide range of feedback was received therefore this has been summarised by theme below.

### Engagement and consultation – effectiveness:

3.11.11 Generally, stakeholders wanted to see greater consistency on engagement practice across different types of Airspace Change Proposal and Change Sponsor. One stakeholder talked about airports and how engagement was not standardised on their Airspace Change Proposals.

3.11.12 One stakeholder wanted to see CAP1616 embrace newer, emerging types of engagement (such as co-design, co-production etc):

***“If the principle is community engagement, can we see more on co-production, co-design, co-evaluation?”*** National representative organisation.

3.11.13 Some stakeholders wanted to see a CAA/DfT led education training course on consultation and engagement. Further explanation and guidance were requested on the reasons and considerations for engagement in the Airspace Change Process:

***“...Can more be done by DfT / CAA on this educational function...without fully explaining why, how, who and when, and bringing communities with you.”*** National representative organisation.

3.11.14 Another national body discussed the role of how *other* CAA policies impacted engagement and consultation on CAP1616. They cited the example of CAP 1991 (which addressed the Airspace Classification Review Process) which engaged on the same cohort of people affected by airspace modernisation. The same cohort of people could be engaged *again* as a part of the CAP1616 Airspace Change Process, leading to fatigue for both Change Sponsors and other stakeholders. They made a case for rationalisation:

***“There is real risk of consultation fatigue and confusion. The majority of the burden lies with CAP1616 due to the large number of ACPs. These need to be rationalised, for example, by establishing the process for multi-sponsor, multi-ACP consultation where there is a strong co-dependent interrelationship.”*** National representative organisation

3.11.15 A community noise group highlighted the need for consultation responses to be available to communities for them to seek additional information.

***“Results of consultations need to be made available to communities with the opportunity to question the results and seek additional information. This is not adequately provided for by CAP 1616. There needs to be much greater opportunity for stakeholders to review the responses (statistically if necessary) and Change Sponsor’s conclusions from public consultation and indeed the veracity of the consultation itself.”*** Community noise group

**Transparency/clarification:**

- 3.11.16 Transparency and clarification reoccurred several times in this question, particularly with regards to the Airspace Change Process and the guidance provided.
- 3.11.17 Some stakeholders stressed the importance that definitions are clearly understood by stakeholders and requested guidance on certain terms used in CAP1616, in particular the terms 'inhabited area', 'negligible' and 'respite'.

***“We require a better definition or guidance on “inhabited area” – e.g., if only one house is overflowed, is that an inhabited area?...Likewise ‘negligible’... please provide guidance on what is meant by the term (qualitative is fine).”***

**Change Sponsor – Air Navigation Service Provider**

***“It clearly needs to be understood what “respite” means and how it can be delivered as part of an airspace change project.”*** **National representative organisation**

- 3.11.18 Other stakeholders stressed the importance of having a definition for tranquillity and requested clearer guidance relating to any requirements associated with tranquillity within CAP1616.

***“There must be a definition of ‘tranquillity’ for this to have merit. There is a requirement to consider it but no guidance on how to do this. For example, at the moment the glossary states ‘there is no universally accepted definition of tranquillity and therefore there is no accepted metric by which it can be measured’...There needs to be a clear link in CAP1616 to the specific requirement needed.”*** **Change Sponsor – Air Navigation Service Provider**

- 3.11.19 One Change Sponsor wanted to see improved practical guidance on the process for pausing, restarting and withdrawing Airspace Change Proposals and suggested this could be presented with the support of a flowchart.

- 3.11.20 The same stakeholder suggested that there should be a 'lessons learnt' page to reduce instances of Change Sponsors not progressing through gateways and requested clarity, in terms of consistency, and transparency regarding gateway 'acceptance', 'failure' and 'decision pending' states, with examples.

***“...It is currently not clear why certain ACPs pass a gateway with work-off items, and others are placed into a ‘decision pending’ state with similar work-off items”*** **Change Sponsor – Air Navigation Service Provider.**

- 3.11.21 Other Change Sponsors also requested that the assessment outcomes are detailed for transparency.

***“...An open and transparent assessment criterion is required, allowing industry to gain the right information and not waste time and money.”***

### **Change Sponsor – Unmanned Aerial Systems (UAS) / Remotely Piloted Aircraft Systems (RPAS).**

***“Where a decision meeting concludes that a submission had failed, or that the CAA was ‘minded approving’, we would propose that a full statement of reasons should be published and made available to all stakeholders on the CAA’s portal. Change Sponsor – Airport.***

3.11.22 A national representative organisation surmised that Change Sponsors were uncertain as to the structure, level, and quantity of information they needed to provide, and felt that more guidance could be provided to give clarity for Change Sponsors. They suggested that this would also provide a clear linkage between CAP1616 and the AMS, save on time and cost and promote faster decision making by the CAA as a result of receiving standardised inputs. They proposed the following recommendation:

***“... Publish a standard set of principles aligned to the Airspace Modernisation Strategy that allows Sponsors to provide more concise input to the CAA. Provide templates and exemplar submissions to assist sponsors prepare their input.” National representative organisation***

#### **Airspace modernisation:**

3.11.23 A Change Sponsor questioned how the proposals set out in the CAP1616 consultation will fulfil the airspace modernisation strategy’s requirements for the integration of UTM (Unmanned Aircraft System Traffic Management) and new entrants. The dynamic routes required for BVLOS operations, coupled with the needs of higher altitude airspace users (such as space launches), equals the need for a dynamic Airspace Change Process.

***“The consultation stops short of providing a clearer understanding of how the ACP may be applied e.g., how the ACP may be scaled. This clarity is important to new airspace users because they require regular and dynamic introduction of new routes to scale operations... The CAA needs to develop the CAP1616 process for new airspace entrants e.g., Spaceport and UTM.” Change Sponsor – Air Navigation Service Provider.***

3.11.24 A national representative organisation questioned whether CAP1616 supports the introduction of trial and then permanent Transponder Mandatory Zones (TMZs):

***“We strongly support the recent publication of the CAA’s AMS and the measures proposed to facilitate airspace integration, especially the introduction of trial and then permanent Transponder Mandatory Zones (TMZs). However, we are concerned that CAP1616 does not support this ambition and therefore urge the CAA to reflect the importance of these updates in the CAP1616 document and/or accompanying guidance in order***

***that the ambition of the AMS is deliverable” National representative organisation.***

#### **CAP1616 Review:**

3.11.25 Many stakeholders gave their views of the CAP1616 review process itself. Many identified that the process has been lengthy and complex.

***“...We note that even this consultation document, at 94 pages long, is lengthy and complex and risks reducing the overall accessibility of the review process.” National representative organisation.***

***“The complexity and length of the consultation is likely to deter responses from outside the aviation sector” Local representative organisation.***

***“The level of technical knowledge required to understand this Consultation and the proposed changes is beyond the majority of those residents likely to be affected.” Resident affected by aviation.***

3.11.26 Some stakeholders questioned whether the CAP1616 review is leading to a better quality of outcomes in comparison to the previous CAP725 process.

***“...We've just ended up burdening everyone with more work, more 'consultation', but actually the reality and outcomes are the same. Is 1616 really leading to a better quality of outcomes / decisions? I find it surprising that while there is much focus on how to improve 1616 as a document (which is no bad thing), there is less reflection on this more fundamental question.” Member of the General Aviation community.***

3.11.27 Other respondents expressed that the proposals under the CAP1616 review were Change Sponsor leaning and saw this as a disbenefit to impacted communities.

***“...All the proposals represent a distinctive move back to CAP725 in seeking to allow aviation to push forward with airspace change to the disbenefit of communities.” Resident affected by aviation.***

3.11.28 Other stakeholders felt that the CAP1616 review hasn't gone far enough to address the needs of all stakeholders.

***“...Within the limited scope of the options being considered, [Stakeholder Name] is not confident that the prime objectives of simplification and consistency of interpretation (clarity) will be realised...” National representative organisation.***

#### **Overflow communities:**

3.11.29 Overflow communities took the opportunity to express their final views on the Airspace Change Process, with residents affected by aviation and community noise groups highlighting the need for more effective engagement within the

Airspace Change Process to ensure impacted and newly impacted communities are reached.

***“Often the sponsors only use the forums within the airport to inform of consultation, airspace change, etc. Shouldn’t there be more efforts within the process to inform those that could be newly impacted by airspace change in view of FASIS/ FASIN?”*** [Community noise group](#).

***“There needs to be more engagement, clearer and better information to facilitate the understanding by the non-technical audience in order that they are able to understand what the changes will mean for them.”*** [Resident affected by aviation](#).

3.11.30 Some stakeholders felt that cumulative impact should be assessed at stage 2, so that options in the Comprehensive List of Options are not discounted before noise reduction (a benefit to communities) is realised.

***“There is also an issue around the assessment and appraisal of the cumulate impact of arrival and departure paths not taking placed until Stage 3 which risks eliminating some options from the CLOOs which may have community benefits in terms of noise reduction. It would make sense for this analysis to take place in Stage 2B so that a sponsor can explain why it has decided to take certain options forward and reject others, based on actual analysis of how those flight paths would operate.”*** [Community noise group](#)

#### CAA resource:

3.11.31 Some stakeholders emphasised that CAA resource is pivotal to the effectiveness of the Airspace Change Process.

***“A process is only as good as the resource and capability to support it. We request that the CAA is continuing to invest in its own capability to reduce the current extensive ACP backlog and to give industry the assurance that it can keep to agreed timescales.”*** [Change Sponsor – Air Navigation Service Provider](#).

#### Temporary Airspace Change Proposals and Airspace Trials – stakeholder engagement:

3.11.32 Consultees representing the GA community suggested separate guidance should be provided for engagement with regards to Temporary Airspace Change Proposals involving RPAS, voicing that these often take place over a short period of time and are a concern for the GA community.

***“May be worth parsing out a separate page to cover temporary airspace consultation with respect to drones – especially as some temp airspace consultations for these have taken place in a very short time and temporary drone corridors are of a concern to the GA community ... the requirements***

***and technology for these is evolving all the time and includes a conversation on Conspicuity.” Member of the General Aviation community.***

### **Temporary Airspace Change Proposals and Airspace Trials – new entrants:**

3.11.33 One National representative organisation wished to seek clarification on the process and assessment criteria for both the Airspace Change Proposal assessment and the Operational Safety Case that RPAS related Change Sponsors are required to submit.

***“The CAP1616 process is rightly used today to govern applications by new entrants to establish temporary or permanent TMZs. At the same time, operators are submitting Operational Safety Cases (OSCs) to present their concepts of operation within these TMZs including measures to mitigate the air risk. We are concerned today that these two processes have become intertwined and confused. We therefore seek that the two processes are separated with greater transparency and clearer assessment criteria for each half of the application. We believe that this will reduce workload and burden on both the regulator and applicants.” National representative organisation***

3.11.34 A member of the GA community wished for Change Sponsors (especially RPAS-related Change Sponsors) to be held accountable to the original timescales they originally propose to reduce additional workload for the GA community who are required to re-assess proposals when extensions are granted.

***“Far too often ACPs that affect GA fail to meet the timescales stated by sponsors, so extensions are sought, and granted. This is especially true of UAS trials sponsors. GA organisations - airfields, flying clubs, etc - are required to re-assess how the proposal will affect their operations (Club Days, Fly Outs, etc) for every extension.” Member of General Aviation Community***

### **Temporary Airspace Change Proposals and Airspace Trials – transition to Permanent Airspace Change Proposal:**

3.11.35 Both residents affected by aviation and local representative organisations expressed that they do not support any bridge from an Airspace Trial to a Permanent Airspace Change Proposal, voicing the concern that the aviation industry seeks to suggest that a trial can be subsequently instigated as a Permanent Airspace Change Process.

### **Environmental:**

3.11.36 Stakeholders took the opportunity to share their views on environmental requirements for the Airspace Change Process.



3.11.37 One stakeholder supported the proposal to add metrics such as tranquillity and biodiversity to Appendix A Table A1 and Appendix E Table E2 that are not currently included. They provided the following reasoning:

***“We support this proposal and believe that it is in line with the Government's stated determination to halt biodiversity decline.”*** National representative organisation.

3.11.38 The same stakeholder called for greater monitoring and enforcement of airspace changes once approved.

***“The CAA...should monitor and enforce the achievement of those conditions. In our view this requires both robust enforcement powers and an effective monitoring and reporting regime.”*** National representative organisation.

3.11.39 Local representative organisations and community noise groups wanted to see more guidance provided with regards to environmental requirements (specifically with regards to emissions, frequency of overflight and pre and post noise impact analysis). One stakeholder suggested developing further guidance with the input from Airport Consultative Committee noise sub-groups.

***“...We believe it is essential for the CAA to provide more guidance on how to conduct pre- and post- noise impact analyses, taking input from local experts such as members of ACC noise sub-groups.”*** Community noise group.

3.11.40 One stakeholder wanted current air quality data to be published to enable communities to determine whether they are likely to be affected by an Airspace Change Proposal.

***“To promote trust and transparency there needs to be, current, baseline air quality data published for the Lower and Upper Airspace. Enabling communities ...to know if they are to be adversely affected by any new, temporary or permanent, ACP.”*** Councillor or MP.

3.11.41 Another stakeholder requested that the application of CAP 2091 (CAA Policy on Minimum Standards for Noise Modelling) to Airspace Change Proposals should be made clearer.

***“If tranquillity and biodiversity metrics are required there must be clear guidance on this, as there are no standard methods for assessing these.”*** Other - Consultant

3.11.42 Some respondents including community noise groups and a local representative organisation suggested that aircraft noise has a particularly negative impact on those people with SMI (serious mental illness), increasing annoyance by aviation noise. They made the following point:

***“The need to feel safe in open spaces is a basic human right and is especially crucial for those people with (SMI) who are particularly vulnerable to noise. Indeed, Public Health England and the Equality Commission have publicly stated the centrality of this to MH equality and good mental health generally...It is vital this issue is addressed.” Local representative organisation and Community noise group (gave same response)***

3.11.43 A stakeholder gave their views on SoNA (a Survey of Noise Attitudes where fieldwork began in 2014). They felt that further study should take place at the earliest opportunity to evaluate impacts of noise at lower levels:

***“SoNA should be replaced at the earliest opportunity with a satisfactory evidence base study which includes a detailed study on the effects of change of noise levels down to lower levels than at present. Given that present data used to set UK thresholds is not robust (in particular SoNA 2014 is flawed and Miedema data is ~ 40years old) along with the reality that ANAS will be some time away, changes in airspace need to use the most robust evidence presently available and incorporate sensitivity and risk analyses. The evaluations of impacts need to be made to below what WHO finds as significant levels of noise annoyance e.g., lower than 45dB Lden with 40dB Lnight – and the financial impacts used in the Transport Analysis Guidance (x webTAG) should reflect the findings of WHO especially for noise annoyance.” Community noise group.***

#### **Alternative options/suggestions:**

3.11.44 One Change Sponsor took the opportunity to make some other suggestions to improve the Airspace Change Process for Change Sponsors. These included a recommendation to enhance guidance through the provision of review checklists, a marking criterion and a suggested wordcount for each area. They also proposed that at the point of submission, the Change Sponsor could present an 'overview' of the submission to a 'Gateway review panel'. They suggested that this could be followed by a further 'Gateway review panel', two-weeks after document submission, which would allow the reviewers to ask any clarification questions. Lastly, they suggested that the CAA could offer a 'critical friend review' of early drafts of key submission documents.

3.11.45 A community noise group recommended that following best practice methodology for major national infrastructure projects should be adopted, which should include the maintenance of a risk register for all major Airspace Change Proposals.

3.11.46 A Change Sponsor proposed the following to alter the focus of design principle definition and rationalising the Design Principle Evaluation process:

***“Our proposal would thus be to keep DPs as part of the objectives setting process only, and not as part of the evaluation. Engagement could still be undertaken to present objectives and inform stakeholders of the ACP, as***

***well as to gather information to make sure sponsors have sufficiently understood the environment and to identify operational or other shortcomings of options. DPs would then help sponsors think of wider requirements and the preferences of their stakeholders as they set the objectives and statement of need for the ACP. This would help ensure a broadly comprehensive set of options is defined, without the need to evaluate the options against the DPs.”*** [Change Sponsor – Airport.](#)

### **Part 1c Airspace Change Process for RNP Instrument Approach Procedures (IAPs) without an Approach Control Service:**

3.11.49 A national representative organisation expressed that Part 1c was unclear, that the ATM safety questionnaire should be published and that the relationship between Part 1c and other relevant documents should be clarified. More guidance was sought on Part 1c criteria. It was suggested that the scope of Part 1c should be broader to include airports with an approach control service.

***“It seems illogical for the criteria of Part1c to be wholly predicated on the lack of approach control - the CAA should consider the possibility of sponsors who intend (or who may intend in the future) to include an approach control service with a new IAP, but otherwise meet the criteria of Part1c. The ATM safety questionnaire should be published... The relationship between CAP1616 and CAP 2304 should be clarified and guidance consolidated if necessary... The strong recommendation ('should') for other design principles in addition to the mandatory ones is possibly unhelpful. In the context of IFP it is more common to have design requirements or constraints (such as proximate regulated airspace or other aerial activity) that must be addressed, just having more principles is not relevant. Most of this activity will take place under para 352 with the APDO anyway...The CAA should consider providing more guidance on engagement with stakeholders under Part 1c...”*** [National representative organisation.](#)

### **CAA response on Alternative or Additional Options and other feedback related to the Airspace Change Process (Questions 41 and 42):**

#### **Engagement and Consultation (Questions 41 and 42):**

3.11.51 One stakeholder wanted to see CAP1616 embrace newer, emerging types of engagement (such as co-design and co-production). It is the responsibility of the Change Sponsor to own the engagement methodology and the responsibility of the CAA to assess the outputs. While the CAA embraces newer types of engagement, we cannot be prescriptive in terms of engagement methodology.

3.11.52 While we do not intend to facilitate a training course specifically related to consultation and engagement, we will investigate the possibility of developing a

specific training course on the Airspace Change Process to support training and development.

- 3.11.53 We recognise that there is a risk of consultation fatigue for stakeholders and agree that consultations for multi Change Sponsor and multi- Airspace Change Proposals should be rationalised where appropriate. Where possible, consultations will be scheduled to deconflict with each other or combined where it is beneficial to do so. For example, there is a plan for the Scottish cluster<sup>16</sup> Airspace Change Proposals to coordinate their consultations.
- 3.11.54 We acknowledge the feedback received regarding the need for consultation responses to be available to communities in order for them to seek additional information. Within CAP1616 there are opportunities outside of Stage 3 (consult) in Stages 1, 2, 5, 6 and 7 for stakeholders to provide their views and where the CAA feels it is appropriate, the Change Sponsor can be asked to re-engage. There is already an expectation within the Airspace Change Process that Change Sponsors should continue to engage with their stakeholders. This will be made clear in the new CAP 1616 document set.
- 3.11.55 We will not provide independent technical advice; however, we will ensure we provide a single point of contact for all enquiries and complaints concerning the use of UK airspace and the Airspace Change Process. We will also explore the possibility of facilitating annual 'show and tell' events to educate and inform the various groups of stakeholders that have an interest in the Airspace Change Process. We will look into the possibility of developing short educational videos related to the Airspace Change Process, that will be uploaded to the CAA's YouTube channel and shared via the CAA website to educate stakeholders and increase transparency. We will also work with relevant CAA colleagues to review and update the website so that it provides a holistic and coherent view of airspace, with clear links between relevant legislation and policy (e.g., AMS) to the Airspace Change Process.

#### **CAA resource (Questions 41 and 42):**

- 3.11.56 We recognise that CAA resource is pivotal to the effectiveness of the Airspace Change Process. We are increasing CAA resource and are continuing to consider the structure of the Airspace Regulation team to increase capacity and support the reprioritisation and optimisation of work.

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<sup>16</sup> The Airspace Modernisation Masterplan refers to four 'clusters' of airspace changes based on the geographical location of airports' terminal airspace structures by region (known as terminal manoeuvring areas or TMAs). These are: the West Terminal Airspace (WTA); the Manchester TMA (MTMA); the Scottish TMA (STMA); and the London TMA (LTMA).

**Transparency/clarification (Questions 41 and 42):**

- 3.11.57 We acknowledge the request for clearer definitions of certain terms used within CAP 1616. We will provide access to a glossary which will apply across the document and where we think it is appropriate to do so, we will provide clearer definitions and associated requirements. One Change Sponsor wanted to see improved practical guidance on the process for pausing, restarting and withdrawing Airspace Change Proposals and suggested this could be presented with the support of a flowchart. We agree that this would be useful for Change Sponsors, and we will include guidance to this effect within the introductory section of the main Airspace Change Process document. We will also consider covering lessons learnt from instances where Change Sponsors have not progressed through gateways in the annual 'show and tell' events we are investigating developing and facilitating.
- 3.11.58 Some stakeholders requested clarity, in terms of consistency, and transparency regarding gateway 'acceptance', 'failure' and 'decision pending' states, with examples. While examples won't be included, we will describe the gateway outcomes, including the criteria for each outcome, within the Stage 1-7 Guidance Document to improve transparency and provide clarification to stakeholders.
- 3.11.59 One stakeholder wished for a set of standard principles aligned to the Airspace Modernisation Strategy to be published to allow Change Sponsors to provide concise input to the CAA. Based on this feedback, the CAA has decided to introduce examples of the types of characteristics which indicate whether or not a proposal is consistent with the AMS. This is to further clarify the CAA's decision criteria and promote transparency and consistency across proposals, which was recognised as an important need across stakeholder groups. As Change Sponsors refine their designs and assess the impacts of those designs in detail, Change Sponsors can refer to the new characteristics that will be included in CAP1616 to gauge to what extent their proposal is consistent with the AMS. More detail regarding this can be found within section 3.7 of this document.
- 3.11.60 The same stakeholder wished for templates and exemplar submissions to be provided to assist Change Sponsors prepare their input. Based on this feedback, we will develop submission checklists and templates where appropriate to help clarify what the CAA expects to see within the documents submitted by Change Sponsors.

**Airspace modernisation (Questions 41 and 42):**

- 3.11.61 Some stakeholders questioned how the proposals set out in the CAP 1616 review consultation will fulfil the airspace modernisation strategy's requirements. As described in the above response section, we have been building in better references to the AMS throughout the document set. All Airspace Change Proposals must demonstrate that they are not inconsistent with the AMS.

**CAP1616 Review (Questions 41 and 42):**

- 3.11.62 We recognise that some stakeholders have found the CAP 1616 review process to be lengthy and complex. We will be undertaking a lessons learnt exercise internally to identify future opportunities to improve this type of activity.
- 3.11.63 We acknowledge the feedback received from stakeholders that feel the review hasn't gone far enough to address the needs of stakeholders. Throughout the review, we have been influenced by the feedback we've received which enabled us to develop the proposals in this consultation. The challenge throughout has been to balance the needs of three different stakeholder groups – stakeholders that are impacted by airspace change, the Change Sponsors responsible for progressing airspace change and the CAA as the regulator overseeing the Airspace Change Process. We are therefore intending to progress a package of changes that will focus on providing simplification; clarification; proportionality; and capacity. The package of improvements involves multiple strands, noting that some of these will take longer to develop and deliver. While our priority will be to develop and publish a new suite of CAP1616 documents, we will also do more to educate and inform stakeholders about the requirements of the CAP1616 Airspace Change Process, including investigating the possibility of developing a specific course on the Airspace Change Process, transparently providing process related advice/guidance, and developing and implementing annual 'show and tell' events. We will also make better use of the CAA website so that it provides a holistic view of airspace, develop and implement videos/animations to improve understanding and awareness, while considering options to improve the functionality of the Airspace Change Portal (search, notifications, news etc).
- 3.11.64 We appreciate that Change Sponsors are keen to avoid restarting or repeating a part of the Airspace Change Process if they are midway through the process when new guidance is issued. We are evolving the CAP 1616 Airspace Change Process and not completely revolutionising it. We will work with Change Sponsors to help them understand what the changes mean for their Airspace Change Proposal, if any.

**Overflown communities (Questions 41 and 42):**

- 3.11.65 Some stakeholders highlighted the need for more effective engagement within the Airspace Change Process to ensure impacted and newly impacted communities are reached. We will ensure that adequate guidance on stakeholder identification is included as part of the Airspace Change Process. It will remain the Change Sponsor's responsibility to identify stakeholders and our responsibility to assess the Change Sponsor's methodology for stakeholder identification and engagement. Moving the definition of the baseline to Stage 1 will give the Change Sponsor a greater degree of certainty on those who are likely to be impacted by their proposal.

3.11.66 Another stakeholder felt that cumulative impact should be assessed at Stage 2, so that options in the Comprehensive List of Options are not discounted before noise reduction (a benefit to communities) is realised. This response relates to the method and timing of calculating cumulative impacts which is out of scope for the CAP1616 review consultation. This feedback has been relayed to ACOG and the CAA Airspace modernisation team for consideration as part of the masterplan programme.

### **Temporary Airspace Change Proposals and Airspace Trials (Questions 41 and 42):**

- 3.11.67 One stakeholder suggested that separate guidance should be provided for engagement with regards to Temporary Airspace Change Proposals involving RPAS while another RPAS related stakeholder requested simplification of the Airspace Change Process for RPAS related proposals. We will provide one Guidance Document which covers the requirements for both Temporary Airspace Change Proposals and Airspace Trials.
- 3.11.68 Clarification on the process and assessment criteria for both the Airspace Change Proposal assessment and the Operational Safety Case (OSC) that RPAS related Change Sponsors are required to submit was requested. While the detail of the assessment criteria for the Operational Safety Case won't be included within the Airspace Change Process, we will highlight within CAP1616 the dependency that exists between the OSC assessment, and the Airspace Change Process assessment.
- 3.11.69 Some stakeholders wished for Change Sponsors to be held accountable to their original proposed timescales to reduce workload for stakeholders who are required to re-assess proposals when extensions are granted. It will remain up to the Change Sponsor to provide a timeline for the CAA to consider and agree on. If a Change Sponsor needs to update their timeline, they need to discuss this with the CAA and explain why. The new Guidance Document will cover what the Change Sponsor needs to take into consideration when formulating their timeline to ensure that timescales proposed are realistic from the outset.
- 3.11.70 In response to the feedback received from some stakeholders who expressed that they do not support any bridge from an Airspace Trial to a Permanent Airspace Change Proposal, we will not be introducing an abridged Airspace Change Process for Permanent Airspace Change Proposals which follow Temporary Airspace Change Proposals or Airspace Trials. As explained within the Temporary Airspace Changes and Airspace Trials section of this document, we do not consider that is appropriate because the requirements for a trial or temporary proposal are scaled and so it is not possible for there to be a seamless transition between the two. While Change Sponsors will still be required to follow the requirements set out within the Permanent Airspace Change Process, we will acknowledge that they may be able to use what they have learned from their

Temporary Airspace Change Proposal or Airspace Trial to inform the development of their Permanent Airspace Change Proposal.

**Environmental (Questions 41 and 42):**

- 3.11.71 One stakeholder supported the proposal to add metrics such as tranquillity and biodiversity to Appendix A Table A1 and Appendix E Table E2 that are not currently included. In addition to improving the robustness of the contents of the current Appendix A Table A1 and Appendix E Table E2 to include such additional metrics, Change Sponsors are also required to identify all European sites<sup>17</sup> potentially impacted by the airspace change as part of the description of their baseline and assess such impacts during the Options Appraisal phases.
- 3.11.72 One stakeholder called for greater monitoring and enforcement of airspace changes, once approved, as part of the Stage 7 PIR process. The current environmental assessment requirements for the PIR process require Change Sponsors to confirm that the impacts are as anticipated and presented in the approved proposal (together with any necessary supporting evidence) or present a re-assessment of the impacts using actual data to update the results. All assumptions made in the initial assessment are reviewed and compared with actual data since implementation. The current requirements are therefore adequate and remain in place within the updated CAP1616 document set.
- 3.11.73 Local representative organisations and community noise groups wanted to see more guidance provided with regards to environmental requirements (specifically with regards to emissions, frequency of overflight and pre and post noise impact analysis). One stakeholder suggested developing further guidance with the input from Airport Consultative Committee noise sub-groups. The environmental assessment requirements for Airspace Change Proposals are given in the Department for Transport's (DfT) Air Navigation Guidance 2017 (ANG 2017). These requirements are reflected in CAP1616 along with additional supporting guidance on how environmental assessments should be performed and presented. While the overarching requirements remain the same, the updated CAP1616 document set will improve the detail of guidance provided. Furthermore, as already specified in the current CAP1616 (version 4), engagement with affected communities may reveal other metrics for explaining and portraying noise impacts which the Change Sponsor may then wish to include in their environmental assessment. Moreover, environmental impacts both pre and post airspace change implementation are considered through the Options Appraisals where airspace Design Options are compared against the current day baseline, and then

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<sup>17</sup> European sites which are protected by the Habitats Regulations are Special Areas of Conservation (SACS) and Special Protection Areas (SPAs). Any proposals that affect these will require a Habitat Regulations Assessment.



subsequently as part of the PIR process which ensures that environmental impacts are as anticipated in the approved proposal.

- 3.11.74 One stakeholder wanted current air quality data to be published to enable communities to determine whether they are likely to be affected by an Airspace Change Proposal. Local air quality assessments are only required for Level 1 Airspace Change Proposals and undertaken only when the proposed airspace change has the potential to have an impact on emissions (either their volume or distribution) below 1,000 feet and in the vicinity of a location that has been designated as an air quality management area (AQMA). There is therefore no specific requirement for Change Sponsors to provide baseline air quality data unless impacts on local air quality are anticipated to occur. However, for Level 1 Airspace Change Proposals, Change Sponsors are required to identify all AQMAs potentially impacted by the airspace change as part of describing the baseline.
- 3.11.75 It was requested that the application of CAP 2091 (CAA Policy on Minimum Standards for Noise Modelling) to Airspace Change Proposals should be made clearer. Noise modelling required as part of the environmental impact assessment for an airspace change must be undertaken in accordance with CAP 2091: Minimum requirements for noise modelling and thereby as per the applicable noise modelling Category. In cases where noise modelling is not required, the Change Sponsor must present a robust rationale along with supporting evidence to justify that a quantitative assessment is unnecessary and would result in no environmental impact, which will then be considered by the CAA. The updated CAP1616 document set specifies that the confirmation of the applicable CAP2091 Category is required at Stage 2. In addition, more guidance in relation to the assessment of tranquillity and biodiversity metrics will be included in the updated CAP1616 document set.
- 3.11.76 We acknowledge the feedback received which suggested that aircraft noise has a particularly negative impact on those people with SMI (serious mental illness). Noise impacts caused as a result of the airspace change, including impacts on communities' health and quality of life are assessed through the Department for Transport's (DfT) Transport Analysis Guidance (TAG). Currently, for aircraft noise, TAG includes impacts on annoyance, sleep disturbance, acute myocardial infarction (AMI) and stroke and dementia. TAG is regularly reviewed by the DfT to consider how new evidence and methodologies should be incorporated and is formally updated twice a year.<sup>18</sup>
- 3.11.77 We acknowledge the stakeholder feedback relating to SoNA (a Survey of Noise Attitudes). The CAA does not accept that SoNA 2014 requires updating. The CAA

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<sup>18</sup> [Guide to WebTAG noise appraisal for non-experts \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/guidance/external-consultation/open-consultation-response/2023-09-08/guide-to-webtag-noise-appraisal-for-non-experts)

has been commissioned by the Department for Transport to conduct a new aviation noise attitudes survey, known as ANAS (Attitudes to Noise from Aviation Sources). This study (for which work is underway) will encompass new fieldwork and its scope will take account of feedback on the SoNA survey. The CAA will publish the ANAS results and their analyses will contribute to the evidence base which the Department for Transport (DfT) and/or DEFRA (Department for Environment, Food & Rural Affairs) may then wish to use to inform the development of any new national aviation noise policy. Any such policy changes, to update the statutory environmental guidance issued to the CAA, aviation industry and communities would be consulted on by the DfT. This updated guidance may then be used to inform environmental assessment requirements and decision making with respect to future Airspace Change Proposals. A suitable transition period will be determined for any such new policy to come into effect.

3.11.78 We heard that some stakeholders wanted to see improved environmental metrics to measure the impact of aircraft noise on communities. Multiple noise metrics are already used to assess noise impacts from Airspace Change Proposals including LAeq contours, noise health impact assessment using DfT's Transport Analysis Guidance (TAG), Number Above (Nx) contours, operational diagrams, and overflight contours, as well as additional optional noise metrics such as LAmx noise levels, 100% mode noise contours and difference contours. Further, as already specified in the current CAP1616 (version 4), engagement with affected communities may reveal other metrics for explaining and portraying noise impacts which the Change Sponsor may then wish to include in their environmental assessment. It should be noted that the LOAEL (Lowest Observed Adverse Effect Level) and TAG are based on the LAeq metric thresholds and therefore this metric continues to remain appropriate for evaluating the impacts on communities' health and quality of life as a result of aircraft noise.

**Alternative options/suggestions (Questions 41 and 42):**

3.11.79 Based upon the feedback received, we will provide checklists for Stages 1, 2, 3 and 4. The scope varies considerably for different Airspace Change Proposals so it would be inappropriate for us to provide suggested wordcounts. The Airspace Change Process will set out the regulatory requirements and our expectations. We are introducing Change Sponsor led briefings at the point of submission for the Change Sponsor to provide the CAA with an overview of their gateway documentation at that time. Should clarification be required in the lead up to the gateway assessment meeting, the CAA will seek that information from the Change Sponsor. The provision of a "critical friend review" would not align with our role as the Regulator.

3.11.80 We are not mandating the maintenance of a risk register but Change Sponsors may do so if they wish. We will retain the Design Principle Evaluation process on the basis that it provides an important part of the Options Appraisal process and a

clear audit trail in terms of how the Design Options align with the Design Principles.

3.11.81 Some stakeholders highlighted the role of simulations in the Airspace Change Process as a potential consideration. Change Sponsors are already able to conduct simulations if they wish. We will enhance guidance on simulations within our revised document set. Other stakeholders discussed how controlled airspace is considered. Minimising the volume of controlled airspace may continue to be set as a discretionary design principle. There is a general duty within Section 70 Transport Act to secure the most efficient use of airspace consistent with the safe operation of aircraft and the expeditious flow of air traffic.

**Part 1c (Questions 41 and 42):**

3.11.82 The feedback received in relation to Part 1c pointed out that it was unclear, that the ATM safety questionnaire should be published and that the relationship between Part 1c and other relevant documents should be clarified. More guidance was sought on Part 1c criteria. It was also suggested that the scope of Part 1c should be broader to include airports with an approach control service.

3.11.83 The development and introduction of CAP 1616 Part 1C is a scaled process that is a consequence of a request from the Department for Transport and the Secretary of State to enable the introduction of GNSS at airfields without approach control specifically as part of the DfT GNSS rollout programme. Other proposals, to aerodromes offering air traffic control services such as approach control, fall within the scope of CAP 1616 for which a level is assigned at the assessment meeting and confirmed at Stage 2. The new version of CAP 1616 will introduce new level definitions and will offer different scalability options.

3.11.84 The ATM Safety Questionnaire must be completed by all Change Sponsors wishing to introduce GNSS approaches in the context of the DfT GNSS rollout programme. The Questionnaire includes guidance on ATM matters to assist Change Sponsors when developing their proposal. The CAA's review and associated feedback on this Questionnaire allows the Change Sponsor to continue to develop their final Safety Case for the design and operation of the procedures. CAP 2304, which supersedes CAP 1122, provides guidance, alternative means of compliance and policy to support the safety arguments and mitigations required for applications to introduce GNSS approaches, also known as Required Navigation Performance Instrument Approach Procedure (RNP IAP). We will incorporate references to CAP 2304 into relevant Guidance Document.

## 4. Next Steps

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- 4.1.1 We welcome the valuable feedback provided during the consultation and appreciate the time that stakeholders have taken to consider our proposals and provide us with their views.
- 4.1.2 Feedback received throughout this consultation and the engagement activities completed prior to it, has confirmed that the Airspace Change Process needs to work for three distinct groups – stakeholders that are impacted by airspace change, the Change Sponsors responsible for progressing airspace change and the CAA as the regulator overseeing the Airspace Change Process. We know that the requirements and expectations may vary between each group. Those requirements are in part delivered through the transparency of the Airspace Change Process and its accessibility.
- 4.1.3 It can sometimes be a challenge to find a balance between the requirements for the groups listed above and we recognise that wider system changes are required beyond evolving the CAP 1616 Airspace Change Process. We are therefore intending to progress a package of changes that will simplify the Airspace Change Process and clarify the requirements, of it while ensuring that the requirements are proportionate and more closely linked to the potential impact of what is being proposed. We will also implement appropriate measures to ensure there is sufficient capacity within the CAA to fulfil its responsibilities in accordance with the indicative timelines.
- 4.1.4 Our priority will be to develop and publish a new suite of CAP 1616 documents, which include a shorter main Airspace Change Process document that will focus on the requirements and the associated Guidance Documents will explain how they can be scaled for Permanent and Temporary Airspace Change Proposals, as well as Airspace Trials. This document will also detail the expected outputs for each regulatory process. We will evolve the Airspace Change Process to address stakeholder feedback by enhancing the way in which scalability is defined, providing greater clarity on key requirements e.g., development of Design Principles and design option. We will also provide more opportunities to give Airspace Change Process related advice and guidance.
- 4.1.5 The main Airspace Change Process document will be supplemented by Guidance Documents that will cover the stages of the Airspace Change Process and types of Airspace Change Proposals. Each Guidance Document will consolidate and rationalise text from the current version of CAP1616 and other related documents, thereby simplifying the Airspace Change Process and providing clarification on requirements. We will also develop submission checklists and templates where appropriate to help clarify what the CAA expects to see within the documents

submitted by Change Sponsors. Outside of these documents, we will update relevant pages on the CAA website and ensure that the Airspace Change Portal is aligned with the new Airspace Change Process.

- 4.1.6 We are evolving the CAP 1616 Airspace Change Process and not completely revolutionising it. We will work with Change Sponsors to help them understand what the changes we are making to CAP 1616 mean for their Airspace Change Proposal, if any.
- 4.1.7 Beyond modifying the CAP 1616 Airspace Change Process; we will investigate the possibility of developing a specific course on the Airspace Change Process to support training and development. We are increasing CAA resource and are continuing to consider the structure of the Airspace Regulation team to increase capacity and support the reprioritisation and optimisation of work. This will include providing adequate resources to ensure we provide a single point of contact for all enquiries and complaints concerning the use of UK airspace and the Airspace Change Process. We will also explore the possibility of facilitating annual 'show and tell' events to educate and inform the various groups of stakeholders that have an interest in the Airspace Change Process. We will look into the possibility of developing short educational videos related to the Airspace Change Process, that will be uploaded to the CAA's YouTube channel and shared via the CAA website. We will also work with relevant CAA colleagues to review and update the website so that it provides a holistic and coherent view of airspace, with clear links between relevant legislation and policy (e.g., AMS) to the Airspace Change Process.
- 4.1.8 Throughout this process, 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.

## Appendix A: Glossary

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**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 Airspace Change Proposals. <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 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>.

**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 for aerodromes or heliports, 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.

**CAP 1616** – 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 Airspace Change Proposal 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 Airspace Change Proposal must have, if it is to achieve successful delivery of its objectives.

**Cumulative impacts** - the effect of multiple Airspace Change Proposals 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** - The principles encompassing the safety, environmental and operational criteria, and the strategic policy objectives that the Change Sponsor seeks to achieve in developing the Airspace Change Proposal. 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 Design Principles.

**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.

**European Aviation Safety Agency (EASA)** – The European Union authority for aviation safety.

**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 Airspace Change Proposal through the Airspace Change 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 Airspace Change Proposals 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 Aeronautical Information Publication, 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 ‘Levels’ depending on the characteristics of the change. For each Level we then apply the requirements of the Airspace Change 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 LAmax.

**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 Airspace Change Proposal. 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, CAP 1498 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.

**Portable Document Format (PDF)** – A file format developed to present documents in a manner independent of application software, hardware, and operating systems.

**Post-implementation review (PIR)** - The CAA reviews how the airspace change has performed, including whether anticipated impacts and benefits in the original Airspace Change Proposal 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 Airspace Change Proposal 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 Airspace Change Proposal, the Secretary of State may determine that the Airspace Change Proposal 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 Design Principles.

**Transparent** – the Airspace Change Process should be clear and easy to understand, while being open to all stakeholders.

**Transponder Mandatory Zone (TMZ)** – Defined airspace structure in which the carriage and operation of transponder equipment is mandatory unless previously agreed.

**Unmanned Aircraft Operator** – the person or legal entity who has control over that aircraft and who organises how that aircraft is or may be used.

**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: Overview of the CAP 1616 Airspace Change Process (Permanent)

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Below is an overview of the CAP 1616 stages.

### **Stage 1: DEFINE**

A Statement of Need is submitted. This is a short statement that sets what the opportunity the Airspace Change Proposal is seeking to address. Design Principles are developed and tested with stakeholders through engagement. The DEFINE GATEWAY occurs at the end of this stage. At the gateway the CAA's regulatory team discuss and decide whether the proposal should proceed to the next stage of the process.

### **Stage 2: DEVELOP & ASSESS**

In this stage, options are developed for the proposal. The Change Sponsor must submit a design principle evaluation and an Initial Options Appraisal of the impacts. The DEVELOP & ASSESS GATEWAY occurs at the end of this stage.

### **Stage 3: CONSULT**

In this stage the Change Sponsor prepares and completes a consultation on the Airspace Change Process. Firstly, they must produce a full appraisal of the option(s) they are proceeding with. Alongside this, they should also produce a consultation strategy. This is then submitted to the CAA in the CONSULT GATEWAY. After the Gateway, Change Sponsors will need to launch the consultation and collate/review responses.

### **Stage 4: UPDATE & SUBMIT**

In this stage, the Change Sponsor considers the consultation responses, identifies any consequent design changes, and updates the Options Appraisal, submitting these to the CAA for review. If they are not required to consult again, the Change Sponsor will formally submit their airspace change proposal to the CAA.

### **Stage 5: DECIDE**

The CAA assesses the proposal in its entirety. There may be a Public Evidence Session. The CAA may issue a draft decision, subsequently will issue a final decision. Alternatively, a 'minded to' decision at the request of the Secretary of State who may have 'called in' the proposal could be produced. At the DECIDE Gateway assessment of materials and an approval must have been given by the CAA or (where the proposal has been 'called-in') by the Secretary of State.

**Stage 6: IMPLEMENT**

In this stage, an approved change is administered and communicated to stakeholders to ensure implementation. The Change Sponsor must continue to consider stakeholder feedback a year after the change has been implemented.

**Stage 7: POST IMPLEMENTATION REVIEW**

If the proposal is approved, and after it has been implemented (Stage 6), the CAA carries out a review of the change (Stage 7), usually after 12 months of operation. During this stage, stakeholders are given 28 days to comment on the review while on the 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>.

. There is no gateway at this stage.

## Appendix C: Overview of the CAP 1616 Airspace Change Process (Temporary)

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There are four stages to go through for a Temporary Airspace change. They are summarised below.

### **STAGE 1- DEFINE**

A Statement of Need is submitted. This is a short statement that sets what the opportunity the Airspace Change Proposal is seeking to address. Although there is no formal requirement for options development (Stage 2) at this point, where there is a likely noise impact, there should be an assessment of noise.

### **STAGE 3 - TARGETED ENGAGEMENT OR CONSULTATION**

The Change Sponsor completes targeted engagement or consultation with aviation stakeholders and or impacted communities, if appropriate. The Change Sponsor should also provide stakeholders with likely impacts of the airspace change proposal.

### **STAGE 4 - UPDATE & SUBMIT**

The Change Sponsor will update their proposal (if necessary) and submit to the CAA.

### **STAGE 5 - DECIDE**

The CAA have a gateway meeting to determine agreement with the airspace change proposal. This process takes 28 days.

## Appendix D: Citizen Space Survey

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### 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 CAP 1616.**

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 change 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 (CAP 1616)?

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 CAP 1616) 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 change 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 change 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 CAP 1616 airspace change guidance. Is there anything you think we should consider when reviewing Stage 6? Change 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 Aeronautical Information Publication 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 CAP 1616 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 Instrument Flight Procedures is a technical subject that some respondents may not wish to give responses on. Do you wish to give your views about Instrument Flight Procedures?

Yes

No

**Clarify Instrument Flight Procedure 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 CAP 1616 Airspace Change process? Please share them below:

## Appendix E: Overview of the Airspace Change Process

