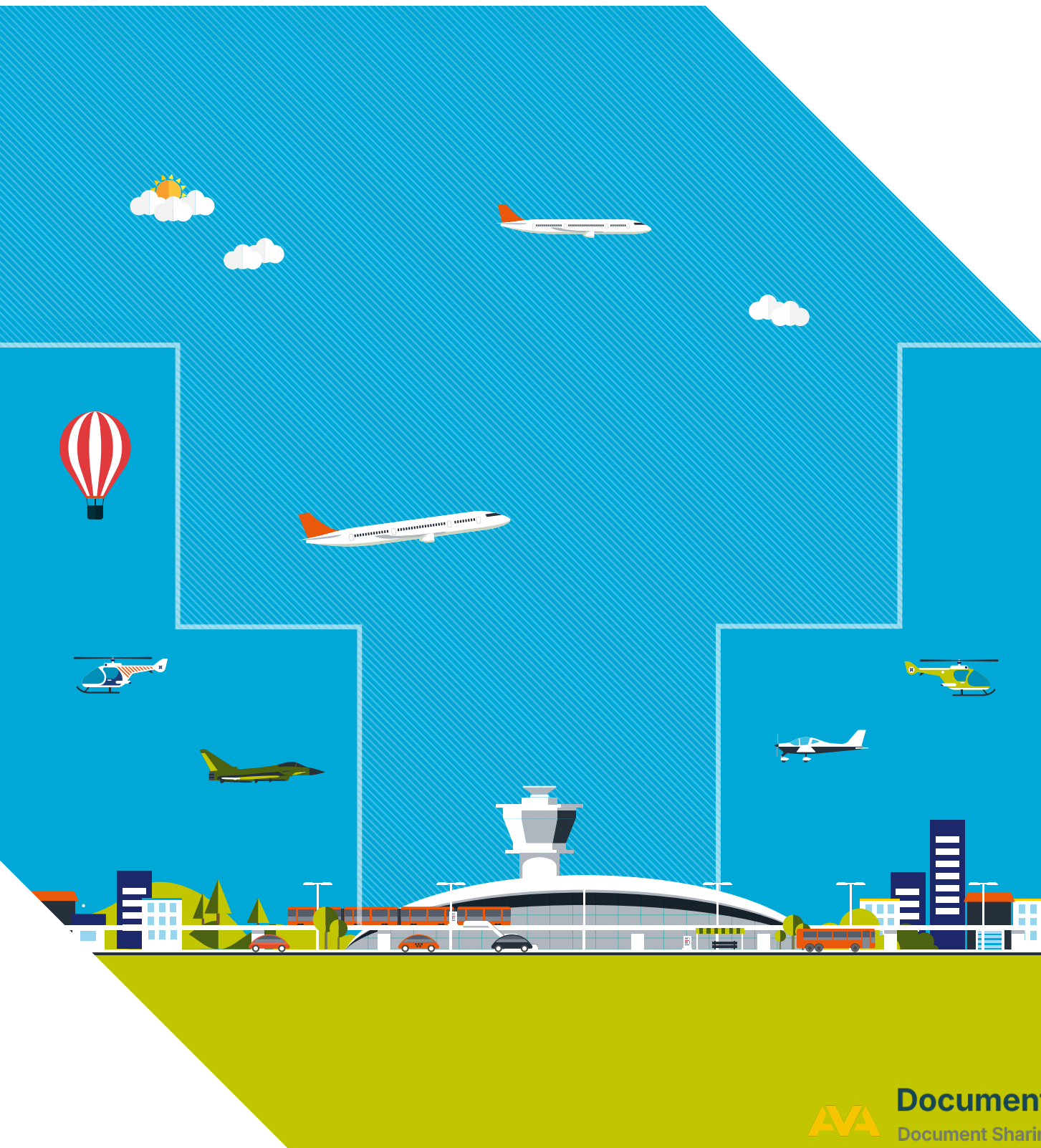


Airspace Change



Guidance on the regulatory process for changing the notified airspace design and planned and permanent redistribution of air traffic, and on providing airspace information

CAP 1616



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The fourth edition incorporates:

- the CAA's policy and guidance relating to the scaled Airspace Change Process for a permanent change to airspace design involving the implementation of Required Navigation Performance (RNP) Instrument Approach Procedures (IAPs) Without an Approach Control Service (WAC)
- updated wording to better reflect the current functionality of the options appraisal
- adding paragraphs in regard to options appraisal to improve the clarity and consistency of the process
- adding paragraphs to **Appendix E** to provide change sponsors detailed explanation on the options appraisal methodologies as defined under The Green Book and relevant sections of WebTAG
- adding a table in Appendix E to provide change sponsors a worked example for the calculation of the 'real prices' as defined under The Green Book
- updated worked cost-benefit table in **Appendix E** to add another economic metric (BCR) that can be used along with NPV as outlined in The Green Book
- minor wording changes to update requirements for traffic forecasts for environmental and economic assessments
- adding wording to reflect CAA online airspace change portal requirements for consideration of multiple stages at the same gateway assessment meeting
- updated wording to clarify the outputs required at Step 3D: Collate and Review Responses
- amended requirement for targeted engagement or consultation for a temporary airspace change
- requirement for targeted engagement with stakeholders instead of consultation for an airspace trial
- adding a reference to the use of digital channels as part of consultation supporting activities options at Stage 3
- minor wording changes to improve the clarity and consistency of the document
- new and updated hyperlinks or cross-references to other documents, and an updated glossary
- corrections of typographical, editorial or production errors that have come to light since the first edition.

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- categories of airspace change

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For more information about:

- consultation and engagement

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- environmental metrics and assessment

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For more information about:

- current and past airspace change proposals

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For more information about:

- airspace
- the CAA's role

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Introduction

What is airspace?

1. In its simplest terms, airspace is the portion of the atmosphere controlled by a State above its territory and areas over the sea within which a State is committed by international treaty to provide air navigation services (which includes air traffic control). It is an invisible national asset. For air traffic control purposes, airspace can be divided into two main categories, controlled and uncontrolled. Controlled airspace is where air traffic control needs to have positive control over aircraft flying in that airspace to maintain safe separation between them. Uncontrolled airspace is airspace where aircraft are able to fly freely without being required to abide by instructions in routing or by air traffic control, although they may request information or a service.
2. Controlled airspace contains a network of corridors, or airways. They link the busy areas of airspace above major airports. At a lower level, control zones are established around each airport. These portions are therefore nearer the ground and closer to population centres. The CAA has a policy of keeping the volume of controlled airspace to the minimum necessary to meet the needs of UK airspace users and to comply with its international obligations.
3. The defined blocks of controlled airspace, and flight procedures and routes within them such as standard departure and arrival routes, are together part of the overall airspace design. This airspace design is published in the UK Aeronautical Information Publication (AIP). Overlaying the airspace design are air traffic control operational procedures – written instructions forming a framework within which air traffic controllers make decisions as to how to control individual aircraft.

Changes to airspace

4. Changes to the design of UK airspace are proposed by an airspace change sponsor,

usually an airport or a provider of air navigation services (including air traffic control). The CAA requires the change sponsor of any permanent change to the published airspace design to follow our **airspace change process**.

5. Airspace change proposals vary greatly in terms of size, scale of impact and complexity. Some may have little noticeable operational or environmental impact. Others may require a complex restructuring of airspace with consequences both for airspace users and the environment, including people on the ground impacted by noise. Because controlled airspace carries with it requirements that affect the aircraft and pilots that fly in it, an airspace change can impact airspace users in different ways. In addition, a revision to air traffic control operational procedures may not involve a change to the design of UK airspace, but it may still have consequences for other airspace users, the environment and people on the ground. The more impactful of such operational procedure changes are therefore also subject to a CAA approval process.
6. Subject to operational constraints (including safety), the design of airspace, and the airspace change process, do not specify, or limit future increases in, the volume of air traffic using a piece of airspace at any given point in time. The volume of air traffic using an airport may however be addressed by land-use planning conditions, where relevant.

CAA role

7. The CAA, as the UK's independent aviation regulator, has responsibility for deciding whether to approve changes proposed to the design of airspace over the UK – the airspace structure and instrument flight procedures within it that are used by aircraft. The design of airspace includes new and established air traffic routes and the areas which commercial aircraft use to fly into and out of airports, and

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the airspace allocated for use by military flights and General Aviation (i.e. private or recreational) flyers.¹

8. We make these decisions in accordance with legal requirements to consider certain factors which include safety, the environment and the needs of users of airspace. For example, changes may be proposed to enable UK airspace to accommodate more flights, to incorporate new technology, to mitigate the effects of aircraft noise, to allow aircraft to fly more direct routes or to keep them away from particular areas. When we are asked to consider a change to the design of UK airspace, we will consider the objective of the change. Before deciding whether to agree any change we then have to consider a range of factors set out in section 70 of the Transport Act 2000, including safety, security, operational and environmental impacts such as aircraft noise and emissions.

For more information about:

- **airspace**
- **the CAA's role**

[CLICK HERE](#) or [CLICK HERE](#)

9. Section 70(2) of the Transport Act 2000 requires the CAA to take account of any guidance on environmental objectives given to it by the Secretary of State when carrying out its air navigation functions.² These functions are set out in the Secretary of State's Air Navigation Directions 2017, as amended³, made under sections 66(1) and 68 of the Transport Act 2000.

1. The definition of General Aviation varies, but is essentially all civil flying other than commercial airline operations. It therefore encompasses a wide range of aviation activity from powered parachutes, gliding and ballooning to corporate business jets, including all sport and recreational flying.

2. Air Navigation Guidance 2017: 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 <https://www.gov.uk/government/publications/uk-air-navigation-guidance-2017>

3. <https://www.caa.co.uk/Commercial-industry/Airspace/Airspace-change/Legislative-framework-to-airspace-change/>

The environmental guidance is known as the Air Navigation Guidance 2017 and was last issued in October 2017 following a government consultation earlier that year. The guidance was amended in October 2019.

10. Following its 2017 consultation, the Government decided to introduce a wholly new category of airspace change, on which it would later direct the CAA to have a decision-making role. This category is for air traffic control operational procedure changes which alter the way the airspace is used within an **existing** airspace design. Whereas changes to airspace design were subject to the airspace change process and consulted on, air traffic control procedure changes could be implemented without consultation, even where the noise impacts were similar to those of a change in airspace design. In other words, because changes to procedures alone formed part of an existing, unchanged airspace design, they were outside the airspace change process.
11. In October 2018 the Secretary of State amended the Air Navigation Directions 2017 to require the CAA to develop and publish procedures, and guidance on such procedures, for the development, consideration and determination of certain types of these proposals.⁴ Consequently, from 1 February 2020, an air navigation service provider must assess whether an intended change to air traffic control operational procedures might lead to a **planned and permanent redistribution of air traffic** that would require CAA approval, known as a '**relevant PPR**' for short. The PPR process represents a shortened version of that used for changes in airspace design and is detailed in Part 2 starting on page 103.

4. The Civil Aviation Authority (Air Navigation) (Amendment) Directions 2018 and The Civil Aviation Authority (Air Navigation) (Amendment) Directions 2019. These amend The Civil Aviation Authority (Air Navigation) Directions 2017. For ease of reference, the CAA has published a **consolidated version** of the directions.

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12. The expectation is that few PPR proposals will be submitted each year (compared with airspace change proposals under the Part 1 process). The CAA must provide a report to the Secretary of State annually outlining, for each proposal for a relevant PPR referred to it under these procedures, the specific type of the relevant PPR, the relevant airport, and whether it was approved.
13. In 2017 the Secretary of State gave the CAA another new role to set guidance for the aviation industry to follow to give local communities better information about the noise impacts from other factors causing a change in the distribution of flights over time, including information on potential ways to mitigate adverse impacts. These factors include new destinations, new aircraft types, increasing demand by airspace users, and the introduction of new technology. The CAA has no approval role or legal enforcement powers here, but will promote best practice and improve transparency. We refer to this as **airspace information: transparency about airspace use and aircraft movements**. It can be found in Part 3 starting on page 136.

For more information about:

- **categories of airspace change**

[CLICK HERE](#)

14. The CAA has reformed the airspace change process to ensure that it meets modern standards for regulatory decision-making, and is fair, transparent, consistent and proportionate. The process must be impartial and evidence-based, and must take account of the needs and interests of all affected stakeholders.
15. While not everyone will agree with every potential decision that changes the UK's airspace design, we want the methods used to reach those decisions to be well understood and respected.

For more information about:

- **current and past airspace change proposals**

[CLICK HERE](#)

16. To ensure that the needs of all stakeholders are met, the process emphasises the importance of engagement. Engagement is the catch-all term we use to mean developing relationships with stakeholders, covering a variety of activities. Consultation, or a formal, notified period seeking input from stakeholders on proposals, is one element of engagement within the process, but engagement can also include information provision, regular and one-off meetings and fora, workshops, and 'town hall' discussions and other contact with third parties. We refer to the overall programme as the change sponsor's 'engagement strategy'. The CAA takes a prominent role in approving the change sponsor's consultation strategy.
17. Outside the airspace change process, the CAA undertakes regular stakeholder engagement with local communities, airports, air navigation service providers, General Aviation and the military at which national policy or process issues can be discussed. The responsibility for engaging with and informing communities about specific airspace change proposals rests with the change sponsor. The CAA should only engage with stakeholders at defined points in the process, and then in a fair and transparent way.

Community engagement requirements

18. The Air Navigation Guidance 2017 creates new expectations for the aviation industry in relation to transparency about its ongoing operations, and specifically requirements concerning proactive engagement with local communities about noise impacts.

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These cover:

- requirements to highlight and explain aircraft operational changes retrospectively through the production of information, and
- proactive expectations to make information available relating to aircraft movements.

The CAA is required by the Government to prepare and publish guidance to help industry meet government expectations in respect of this community engagement, and this guidance (which we group under the heading 'airspace information') forms part of this document.

Who is this document for?

19. This document is intended to be read by the following stakeholders with an interest in changes that impact airspace, in no particular order:
 - Sponsors of airspace change proposals. The change sponsor is usually an airport operator or an air navigation service provider, or the two in partnership may put forward a joint proposal. But a proposal can be put forward by anyone, including the Ministry of Defence, General Aviation stakeholders, or members of a local community. A PPR proposal can only be put forward by an air navigation service provider.
 - 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
 - Other 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 shippers.

How to read this guidance document

20. This guidance document is divided into three categories of airspace change:
 - **Part 1:** Permanent changes to the published (or 'notified') airspace design
 - **Part 2:** PPR (planned and permanent redistribution of air traffic through changes in air traffic control operational procedure)
 - **Part 3:** Airspace information: transparency about airspace use and aircraft movements
21. The main part of this guidance document, Part 1, concerns the seven-stage airspace change process used for permanent changes to the published airspace design. The document guides you through each stage and describes what will happen at each stage of it, and why.
22. There are other ways that the airspace design or the way it is used can change, and the impacts of such changes can also vary greatly. Therefore Part 1 also has shorter sections on the processes that apply to the other categories covering temporary airspace design changes (Part 1a) and airspace trials (Part 1b).
23. The decision-making process for a relevant PPR in Part 2 is based on the process in Part 1, but is shorter. Part 2 summarises the PPR process overall and highlights where it differs from the process in Part 1. In the interests of brevity, the detail of Part 1 is not repeated in Part 2 where the processes are the same, and the reader is asked to cross-refer to Part 1. Detailed guidance which is specific to PPR can be found in [Appendix I](#).
24. Part 3 sets out appendices containing best-practice guidance for industry to give local communities better information about the noise impacts from other factors causing a change in the distribution of flights over time.

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25. The appendices go into more detail about how to undertake or engage in various tasks associated with these processes. The appendices include the templates that need to be used, information about aspects that might need to be considered, and examples of best practice. The subjects covered by these appendices are:

- preparing the Statement of Need ([appendix A](#))
- environmental assessment of the impacts of the proposed change – including noise, CO₂ emissions and local air quality – and the metrics used ([appendix B](#))
- engagement and consultation with stakeholders ([appendix C](#))
- airspace design principles ([appendix D](#))
- options appraisal ([appendix E](#))
- preparing a formal proposal for submission to the CAA ([appendix F](#))
- post-implementation review of the change ([appendix H](#))
- identifying a PPR ([appendix I](#)).

26. There are also two appendices for reference:

- CAA decision criteria ([appendix G](#))
- a glossary of terms used in airspace change ([appendix J](#)).

Webpages with factual information

27. If you have questions about the process which this guidance does not answer, first look at the information on the CAA website at www.caa.co.uk/airspacechange. The CAA website has several pages of related factual information, including:

- [what is airspace](#) and what is an airspace change?

- the [airspace change portal](#), including the CAA's policy on moderating material uploaded to the portal and our obligations to disclose information⁵
- the [Airspace Modernisation Strategy](#), which supersedes the Future Airspace Strategy
- the [legal and policy context](#) within which the CAA must work, including the Air Navigation Directions, the CAA's statutory objectives when carrying out this task and environmental guidance and policy from government which the CAA must take account of.

28. If you need more help in understanding any of these issues, then please email us at airspace.policy@caa.co.uk, but please be aware that we will only answer questions about national policy and process through this address, and not issues about specific airspace change proposals.

Legal framework

29. Under section 66 of the Transport Act 2000, the Secretary of State has given the CAA⁶ a number of airspace-related functions including: the duty to develop policy and strategy on the classification and use of airspace; to publish the UK airspace design; and to approve changes to it or in some cases to the procedures for using it. Under section 70 of the Transport Act 2000, we have a duty to take a number of factors into account when considering whether to agree to an airspace change proposal, including taking account of specific guidance on our environmental

5. Information held by the CAA is subject to legislation that requires us to consider disclosing it on request – the Freedom of Information Act 2000 and Environmental Information Regulations 2004. See <https://www.caa.co.uk/Our-work/Information-requests/Freedom-of-Information/>

6. The Civil Aviation Authority (Air Navigation) Directions 2017, as amended by The Civil Aviation Authority (Air Navigation) (Amendment) Directions 2018 and The Civil Aviation Authority (Air Navigation) (Amendment) Directions 2019, and referred to in this document as Air Navigation Directions 2017.

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objectives contained within the Air Navigation Guidance 2017.⁷

For more information about:

• **the law and who is involved**

[CLICK HERE](#)

Purpose of this guidance

30. The CAA's airspace change process in this published guidance sets out how we give effect to our role to make decisions on proposals to change the notified airspace design or decisions on PPR proposals, and to the law and policy which govern our role. This guidance sets out the framework for the stages of the process and activities involved, from the conception of the need for a change, to consulting and engaging with those potentially impacted, assessing the impacts of different design options from a safety, operational and environmental perspective, and ultimately regulatory decision. Additionally, if the change is approved, this guidance covers implementation and subsequent review of that change.

31. All airspace change proposals are different, and often there are differing requirements and interests that may conflict. Where this happens, the law requires us to consider certain relevant factors and make our decision, having regard to those factors as a whole. This means considering the needs of those requesting the change together with those affected by an airspace change proposal, whether they be other airspace users, service providers like airports, or those on the ground. It is therefore important for all parties to understand how the airspace change process works and how the CAA will reach its decision both in terms of process and the decision-making criteria.

7. Air Navigation Guidance 2017: 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 <https://www.gov.uk/government/publications/uk-air-navigation-guidance-2017>

32. It is therefore essential that the CAA publishes comprehensive, effective and accessible guidance material setting out:

- any government or CAA policies we are applying when making our decision
- the process we will follow
- what we expect from airspace change sponsors or others involved in the process
- how we scale the process so that it remains proportionate to the aims.

33. A clear and consistent airspace change process requires effective guidance material. A lack of specific guidance could otherwise create variation in the approaches to airspace change proposals. For example, variation in the content of consultation documents can be interpreted as the change sponsor deliberately attempting to hide or obfuscate information, and the need for material to be clarified tends to lengthen the process. Our guidance also needs to be comprehensive, transparent, easy to use, and comprehensible to different audiences. It cross-references relevant reference documents for the technical design criteria that a change sponsor must adhere to.

34. This single guidance document is intended to be comprehensive. However, it will inevitably not anticipate all circumstances nor provide all of the answers that interested parties may need. Some issues will be local in nature or specific to a particular change where there is little past precedent. This is why the CAA assigns a case officer or an account manager from its Airspace Regulation team to a specific change proposal to act as a focal point to provide such additional clarification and advice to the airspace change sponsor on how to implement the guidance where needed. Should it be necessary for the CAA to provide additional guidance to the change sponsor, the CAA will publish it.

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35. Throughout this document, the degree of compliance we expect is based on the following definitions:

- 'will' or 'must' means meeting the requirements in full is mandatory unless there is sufficient reason agreed in advance with the CAA and recorded in the relevant documentation published on the [online portal](#)
- 'will normally' or 'must normally' means the requirements must be met in full, unless the CAA determines that the facts in this situation require otherwise
- 'may' means that there is discretion for the sponsor or relevant party to decide whether the guidance concerned is appropriate to the circumstances of the airspace change or activity.

Future review of airspace change processes

36. The CAA will conduct a review of the process for proposed changes in airspace design in 2021, three years after CAP 1616 was first published.
37. The CAA will conduct a review of the PPR process in 2023, three years after its implementation. We may bring that review forward if:
- we are receiving a higher number of PPR proposals than we expected that then cause us resourcing issues and/or impose a disproportionate burden on air navigation service providers
 - the Government reviews its policy (and therefore the Air Navigation Directions) on PPR.

The relationship between CAA guidance and government policy

38. It is important to recognise the difference between this process and the law and government policy concerning airspace (and in particular that concerning environmental impacts). The CAA's airspace change process must operate within the Government's policy framework. We work closely with the Government to ensure clarity around our respective policy and decision-making roles in the airspace change process. However, the CAA cannot review government policy, nor can it make an airspace change decision that does not give effect to that policy.
39. The airspace change process is not designed to be a referendum on views, but it is designed to reach an outcome fairly having regard for the views of all the various stakeholder groups and having considered those views in accordance with our duties in section 70 of the Transport Act 2000. To achieve this outcome and reach a decision, there will have to be trade-offs where there are conflicting objectives, which could mean that some parties are more affected than others.
40. Every airspace change proposal is different and each is considered on a case-by-case basis. 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 (see [Appendix B](#) for more information).
41. Although the Ministry of Defence is part of the Government, it can also be a change sponsor in its own right. Further, a civil change sponsor should treat the Ministry of Defence as an interested stakeholder and thus include it among the consultees in any consultation about an airspace change proposal. The CAA also has its own statutory obligations with regard to national security that will involve the Ministry of Defence.

Categories of airspace change

Introduction

42. There are many different ways that airspace design or the way airspace is used can change. The impacts of such changes will also vary greatly. A formal change to the airspace design may be just a change in nomenclature used by the aviation industry that has no effect other than an update of the relevant systems and manuals. Whereas, in contrast, it is possible for the airspace design to remain unchanged but the noise impacts on the ground to be altered considerably if aircraft are directed by air traffic control in a different way from before.
43. This section and Table 1 on the next page explain how these different changes are categorised in line with directions from the Secretary of State.⁸

Change in the notified airspace design

44. The Secretary of State has given the CAA a decision-making role in respect of three categories of change in airspace design. These are:
- a permanent change to the published (notified) airspace design
 - a temporary change to the published (notified) airspace design (usually less than 90 days, except in extraordinary circumstances)
 - an airspace trial – a trial of airspace design, which may or may not lead to a proposal for a permanent change or of air traffic control procedures or both.⁹

8. The Civil Aviation Authority (Air Navigation) Directions 2017, as amended by The Civil Aviation Authority (Air Navigation) (Amendment) Directions 2018 and The Civil Aviation Authority (Air Navigation) (Amendment) Directions 2019, and referred to in this document as Air Navigation Directions 2017.

9. The definition of an airspace trial in the Air Navigation Directions 2017 reads as follows: (a) changes to airspace design, or air traffic control operational procedures, for the purposes of investigating the feasibility of, or validating proposals for, innovative airspace design, technology or air traffic control operational procedures; or (b) a test of an airspace design or an air traffic control operational practice, in order to assess its performance and effect.

45. The largest section of this guidance (Part 1) concerns the formal airspace change process which the change sponsor is required to follow for a permanent change to airspace design. It also sets out the separate processes for temporary changes and airspace trials.

PPR – planned and permanent change in air traffic control operational procedure

46. The Government has given the CAA a new decision-making role where an air navigation service provider proposes to make particular changes to air traffic control operational procedures that are anticipated to give rise to a planned and permanent redistribution of air traffic (known as PPR for short). This role takes effect from 1 February 2020. The PPR process is explained in Part 2 of this guidance.

Airspace information

47. The CAA also has a role publishing best-practice guidance on airspace information. This relates to transparency about airspace use and aircraft movements. This is to help people identify where there is a noticeable shift in the distribution of flights over a period of time, caused not by a change to the design of airspace or the procedures for using it, but by a change in airline or airport operations as a result of weather, commercial decisions (such as routes flown or aircraft type) or changing traffic volumes.
48. The CAA has no direct regulatory role in respect of such changes (that is, no decision-making or enforcement powers), but will seek to influence the industry's behaviour regarding those changes through the guidance on best practice in this document. See Part 3 headed 'Airspace information' on page 136.

Categories of airspace change

Table 1: Categories of airspace change

Category of change	Process applying	
Changes to the notified airspace design		
A permanent change to the notified airspace design	The airspace change process described in Part 1 of this guidance document	Part 1
A temporary change to the notified airspace design (usually less than 90 days, except in extraordinary circumstances)	Before implementation: Stages 1, 3, 4 and 5 of the airspace change process During operation: engagement, monitoring and feedback to the CAA	Part 1a
An airspace trial*	Before implementation: Stage 1 and information provision During trial: engagement, monitoring and feedback to the CAA	Part 1b
No change to the notified airspace design		
A planned and permanent redistribution of air traffic through changes in air traffic control operational procedure by an air navigation service provider, without changing the notified airspace design (known as PPR for short)	The PPR process described in Part 2 of this document	Part 2
A temporary PPR (usually less than six months, except in extraordinary circumstances)	Before implementation: Stages 1, 3, 4 and 5 of the PPR process During operation: engagement, monitoring and feedback to the CAA	Part 2a
Changes to aircraft tracks for other reasons: no change to either the notified airspace design or air traffic control operational procedure		
A noticeable shift over a period of time in the distribution of flights or aircraft types being flown, caused not by a change to the design of airspace or the procedures for using it, but by a change in airline or airport operations as a result of weather, commercial decisions (such as routes flown or fleet deployment) or changing traffic volumes	Airspace information: transparency about airspace use and aircraft movements – best-practice guidance on transparency by airports and air navigation service providers described in Part 3 of this document	Part 3

*includes a trial of a change in air traffic control operational procedure

Part 1

The airspace change process (permanent changes to the notified airspace design)

Overview

49. The previous section (Categories of airspace change) explained that there are different ways that the airspace design or the way it is used can change. Table 1 sets out the Government's categorisation.
50. This section concerns permanent changes to the notified airspace design, which require the CAA's approval. For such changes we require the change sponsor to follow the formal airspace change process, which is in seven stages, some of which have more than one step. However, these changes can vary hugely in size, scale and complexity, as explained later in this section. This variation has led the CAA to scale our process appropriately. This scaling ensures that change sponsors are not deterred by unduly onerous process or information requirements from bringing forward airspace changes which benefit or have a neutral effect on all stakeholders.
51. There are 'gateways' at four points in the process. At each gateway the change sponsor must satisfy the CAA that it has followed the process correctly before it can move to the next stage in the process. This guidance sets out what is needed to proceed to the next gateway.
52. It is important to note that passing a gateway successfully does not predetermine the CAA's final decision on the airspace change proposal. What it does is give more certainty to those interested in the proposal that the CAA has agreed to the steps taken to reach that point in the process.
53. This section is only about permanent changes to airspace design. The processes for temporary changes to airspace design and trials are described separately later in this guidance.

The seven-stage airspace change process

54. The seven-stage process begins with the change sponsor preparing a Statement of Need setting out what issue or opportunity it is seeking to address and meeting the CAA to discuss it. This is followed by engagement by the change sponsor with those potentially affected by the proposed change on the underlying design principles (**Stage 1** – completion of the 'Define' gateway). At this point, the CAA will agree with the change sponsor the timeline against which we can accept the proposal, having regard to submissions by other parties. This is essential if we are to give certainty to the timescales set out in this guidance.
55. Continuing to liaise with stakeholders, the change sponsor develops one or more options and carries out an initial appraisal of the impacts, both positive and negative (**Stage 2** – completion of the 'Develop and assess' gateway). The change sponsor then prepares a consultation and assesses who should be consulted (**Stage 3** – Steps 3A and 3B – completion of the 'Consult' gateway). The change sponsor consults with those interested parties, including, where appropriate, local communities (**Stage 3** – Step 3C). In the light of responses (categorised in **Stage 3** – Step 3D), the change sponsor may modify the proposals before making a formal submission of the proposal to the CAA for a decision (**Stage 4**).
56. The CAA assesses the proposal, may hold a Public Evidence Session, may issue a draft decision and subsequently will issue a final decision, or alternatively a 'minded to' decision at the request of the Secretary of State who may have 'called in' the proposal (**Stage 5**). 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.

The airspace change process (permanent changes to the notified airspace design)

57. A change sponsor may choose to withdraw or pause a proposal at any point during the process, but will be required to explain why. If this occurs, all the information produced to date will remain available on the CAA's **online portal**, along with a notification that the proposal has been withdrawn or paused, and an explanation of why. A new timeline must be agreed with the CAA, and this will be published on the portal.
58. Figure 1 gives an overview of the different stages of the process.

The airspace change process (permanent changes to the notified airspace design)

Figure 1: Overview of the airspace change process



The airspace change process (permanent changes to the notified airspace design)

Roles and responsibilities

59. The key participants involved in the airspace change process will have the following roles and responsibilities:

- **The CAA** is airspace regulator and primary decision-maker, and responsible for administering the airspace change process and providing guidance on the process to stakeholders. The CAA is bound by statutory duties and must adhere to directions and environmental guidance provided by the Secretary of State. The CAA runs an **online airspace portal**¹⁰ where airspace changes are submitted and monitored, stakeholder comments can be made and viewed, and relevant documentation can be viewed. We will normally assign a case officer or an account manager from the Airspace Regulation team who will act as a focal point for the airspace change sponsor in respect of a specific airspace change proposal. The CAA is not responsible for developing airspace designs or instigating airspace changes, other than in exceptional circumstances. Such circumstances may include a change to meet international obligations where no individual change sponsor can be identified.
- **The change sponsor** owns the airspace change proposal and is responsible for developing it, including taking into account feedback from relevant stakeholders, in accordance with the CAA's airspace change process and the guidance provided by the CAA and by the Government. Anyone can sponsor an airspace change proposal – although it is most typically an airport or

an air navigation service provider. In some cases, the change sponsor will work in partnership with other organisations (e.g. aviation/airspace consultancy firms, approved procedure design organisations) when developing their airspace change proposal. However, the change sponsor remains solely responsible for complying with the process.

- **Stakeholders who may be impacted by airspace change** will normally (and subject to the terms of the applicable process set out in this guidance) have the opportunity to discuss with change sponsors the principles underlying the airspace change and the development of options for the change. They will normally be consulted formally on a proposal and be able to submit information and views on all aspects of the process, in some cases directly to the CAA at a Public Evidence Session held after the final proposal has been submitted to the CAA. They will have access to all relevant documentation, except for commercially (or national security) sensitive material, on the online portal.¹¹
- **Parliament and the Government** are responsible for setting the CAA's statutory objectives, outlining the CAA's functions and responsibilities and providing guidance to the CAA. For certain types of airspace change, the Secretary of State may also decide to call-in a particular airspace change proposal and to make a decision instead of the CAA.
- **Independent Commission on Civil Aviation Noise** – see overleaf.

10. Older airspace change proposals that the CAA has agreed can continue to follow the previous CAP 725 process can be found on the CAA website rather than the online portal.

11. Subject to legislation that requires the CAA to consider requests for us to disclose information that we hold – the Freedom of Information Act 2000 and Environmental Information Regulations 2004. See <https://www.caa.co.uk/Our-work/Information-requests/Freedom-of-Information/>

The airspace change process (permanent changes to the notified airspace design)

Independent Commission on Civil Aviation Noise

60. In 2018 the Government set up the Independent Commission on Civil Aviation Noise (ICCAN).¹² ICCAN is 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. The Secretary of State's Air Navigation Guidance 2017 requires the CAA, in exercising its air navigation functions, also to take account of any best practice which ICCAN may publish on aspects of aviation noise.

61. Specifically within the context of the airspace change process, ICCAN's role is to:
- provide best practice on the best noise management techniques
 - provide best practice on the accessibility of noise information.
62. The CAA expects change sponsors to be mindful of ICCAN's role and best practice throughout the process, and to factor it into a proposal where relevant, with particular emphasis at the following points:

Stages 1 and 2	The change sponsor should follow any relevant best practice published by ICCAN during the early stages of an airspace change proposal when exploring options.
Stage 3	The change sponsor draws upon ICCAN best practice during the consultation stage.
Stage 4	The change sponsor should demonstrate that any best practice published by ICCAN has been appropriately considered in the development of its formal proposal. Where the change sponsor has deviated from ICCAN best practice, the change sponsor should describe the reasoning behind its decision not to follow it.
Stage 5	To ensure transparency in the use of ICCAN best practice, the CAA will demonstrate that we have factored ICCAN best practice into our final decision, including the change sponsor's reasons for deviation from ICCAN best practice within the final design. The CAA will ensure that any best practice from ICCAN on appropriate metrics is taken into account when noise impacts are being assessed. Where an airspace change proposal is called-in for decision by the Secretary of State, the senior Department for Transport official making a recommendation to the Secretary of State, in considering the evidence, will seek to take account of the views of ICCAN.
Stage 7	Any relevant best practice published by ICCAN will be taken into account by the CAA as part of its post-implementation review.

12. <https://iccan.gov.uk>

The airspace change process (permanent changes to the notified airspace design)

Key principles

63. To progress an airspace change proposal to the point where a final decision whether to accept the proposed change is made, the change sponsor must satisfy the requirements set out in this guidance. In particular, the change sponsor must demonstrate:
- a genuine need for the airspace change
 - that relevant options have been devised with the input of those affected
 - that the impacts of those options have been properly assessed through the quality of the safety, operational, economic and environmental analysis
 - that a thorough consultation on the chosen option has been carried out and feedback taken into account
 - that the formal submission to the CAA as a fully developed airspace change proposal contains all the information that the CAA and other stakeholders need in the right format.
64. If these things do not happen, then the CAA will not allow a gateway in the process to be passed.

Gateway sign-offs

65. To help change sponsors and affected stakeholders track how a proposal is progressing and to give greater certainty that the change sponsor is following the process correctly, the CAA applies a series of four gateway sign-offs during the seven-stage process. A sign-off provides the CAA's approval that relevant process requirements and guidance have been followed up to that point, and gives the change sponsor the CAA's approval to move to the next stage in the process. The purpose is to minimise any work having to be repeated, particularly in getting the supporting documentation for consultation right.

Passing a gateway successfully does not predetermine the CAA's later final decision on whether to accept the airspace change proposal. Where the CAA is not satisfied that the requirements have been met, it is likely that the change sponsor would need to revisit the stage(s) concerned. It is entirely at the CAA's discretion whether to give approval for the change sponsor to move beyond the gateway.

66. The criteria a change sponsor must meet for passing each of the four gateways and how we expect these to be achieved are set out at the relevant points in this guidance. The gateway assessment is an exercise in which the CAA will review and sign-off documentation evidencing that the criteria have been met. Where documentation contains material that the change sponsor is asking to be redacted, the sponsor must upload the redacted version to the online portal and submit the unredacted version to [acp.submission@caa.co.uk](https://caa.co.uk) (see 'Transparency' on page 23). The four gateways and related change sponsor and CAA documents uploaded to the portal are:
- After Stage 1 Define: (a) The change sponsor will upload a short document setting out why the airspace change is an appropriate response to a specified problem or opportunity, and (b) design principles that the change sponsor has developed with stakeholders and will take into account in the design. The CAA will upload a statement accepting the design principles.
 - After Stage 2 Develop and assess: an 'Initial' appraisal of each viable design option will be uploaded by the change sponsor and the CAA will upload an assessment of that appraisal.
 - After Step 3B of Stage 3 Consultation: a fair, open and transparent consultation strategy and supporting documentation (including a 'Full' options appraisal) will be uploaded by the change sponsor. The CAA will upload its approval of the consultation strategy and documents including an assessment of the Full options appraisal.

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- After Stage 5 Decision: a document setting out the CAA's decision on the airspace change proposal and the reasons for it.
67. For all gateways except the fourth ('Decision') gateway, the CAA will hold internal monthly 'gateway assessment' sessions, according to a schedule published annually. These assessment sessions are a single, monthly opportunity for a change sponsor to pass a gateway. The annual schedule will ensure that all parties are aware of the potential timelines. The schedule will include deadlines that a change sponsor must meet for its proposal to be considered at each gateway meeting. For example, all materials are submitted at least two weeks in advance, although more than two weeks may be required depending on the size and complexity of the proposal. This would usually be agreed at the assessment meeting. We may request documentation from the sponsor that is referred to in the gateway submission but has not been provided as part of the Gateway submission materials. We may also request the sponsor to provide information by way of clarification relating to statements or assumptions made in the submission. Any further information sought by Airspace Regulation at this stage is for clarificatory purposes and is only for determining compliance with the CAP 1616 process. Where the change sponsor seeks to amend its timeline through the development of its change proposal, this will be subject to further agreement with the CAA and may result in a change to the timeline for submission of materials ahead of a gateway. In all cases, the agreement will be recorded. Subject to the relevant deadline specified by the CAA being met, the CAA will commit to making a decision about whether a gateway has been successfully passed in that meeting (as explained above, gateway sign-off is on process, not on the merits of a proposal). We will record on the online portal whether a gateway has been passed or not.
68. If the CAA deems that a change proposal does not pass a gateway, the CAA will communicate this directly to the change sponsor and record the fact on the online portal, with a clear explanation as to why.
69. The purpose of gateways is to provide certainty to all stakeholders, including the change sponsor. In the majority of cases, passing through a gateway will mean that the CAA has concluded that the process followed up to that point is satisfactory, and will not therefore be a reason **in itself** for the CAA not to accept any ultimate proposal. However, in certain cases where there is a change in the underlying factors, the CAA could reject the ultimate proposal on those grounds, or require elements of the process up to that gateway to be carried out again. An example of such a case would be where the Secretary of State's directions to the CAA change prior to the sponsor formally submitting its proposal to the CAA.

Transparency

70. A prime objective of the airspace change process is that it is as transparent as possible throughout. Those potentially affected by a change in airspace design should feel confident that their voice has a formal place in the process, if trust is not to be eroded. Openness also allows change sponsors to see more clearly what is expected from them.
71. The default position is therefore that all required documents in relation to a proposal are published, including documents from and notes of meetings, and the CAA monitors that this is happening. We will consider withholding material:
- for reasons of national security
 - which the CAA has agreed with the change sponsor should not be made public, in order to protect the legitimate commercial interests of a person or business (in the

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same way that we are obliged to apply the Freedom of Information Act to any information held by the CAA)

- containing personal information, in accordance with data protection law.

72. However, we do not anticipate agreeing to withhold large amounts of information and would only accept redaction of the minimum information necessary to comply with our obligations.

73. For the purpose of transparency, the CAA runs an **online portal**. The portal holds all relevant information on airspace change proposals, including consultation responses. Where any documentation contains material that the change sponsor is asking to be redacted, the sponsor must upload the redacted version to the portal and submit the unredacted version to **acp.submission@caa.co.uk**. Thus, in particular, interested parties are able to see, and be consulted on where appropriate:

- the original identified need as to why a change in airspace design is being considered
- how (if at all) the CAA has agreed to scale the process for the application concerned
- progress of a proposal through defined incremental 'gateways'
- the principles underlying the airspace design, the options derived from those principles and the appraisal of those options
- consultation material and any supporting documentation in an accessible format, adhering to best practice consultation principles
- responses to the consultation (in batches, during the consultation period, but subject to moderation to remove material not appropriate for publication)

- the change sponsor's assessment of those responses and modifications to the proposal in the light of responses
- the formal proposal (and any final adjustments made to it) submitted to the CAA, including an executive summary, the deadline for stakeholders to ask the Secretary of State to call-in a proposal and (in relevant cases) the details of a Public Evidence Session
- a CAA draft decision, where applicable, and comments received on that draft
- the fact that the Secretary of State has deemed it necessary to call-in a proposal, where applicable
- the CAA's (or Secretary of State's) decision including the underlying analysis and reasoning
- analysis from the post-implementation review, stakeholder feedback and the CAA's conclusions.

Where a change sponsor is submitting documentation for consideration of more than one stage at the same gateway assessment meeting, all documentation should be uploaded to the portal at one step together with a statement to reflect this. In the event that multiple gateways are passed the relevant documentation will be moved along to the correct step.

Stakeholder engagement

74. In contemplating any airspace change proposal, the change sponsor must consider the impacts on others and the implications those impacts may have, and engage with them appropriately. Depending on the level of the change, this may include the general public, their elected representatives, community leaders, airport consultative committees, government

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organisations and industry/environmental representative groups; other airspace users; airport operators; and air navigation service providers. All materials must be made available in a manner which is clear and accessible to stakeholders. This document sets out requirements and provides guidance on what is expected at each stage, with more detail in [Appendix C](#).

Safety assessment in the airspace change process

75. Each option for an airspace change proposal identified during Step 2B will need a qualitative assessment of the potential safety considerations at that step, and a detailed final safety assessment must be completed by the change sponsor prior to Step 4B and reviewed by the CAA during Stage 5. A plain English summary of the final safety assessment and of the CAA's review are published on the online portal. This final safety assessment will:
- describe the scope of the proposed airspace change
 - identify new and changing hazards
 - identify and quantify risks arising from those hazards
 - set mitigations for those risks.
76. The CAA has published separate guidance (CAP 760) about the safety assessment.¹³

Scaling the process by assigning a 'Level' to each change proposal

77. It is important to recognise that airspace change proposals vary greatly in terms of size and complexity. A minor change to the boundaries of high-altitude airspace over the sea will be significantly different from a major reorganisation of flightpaths at lower altitudes or over a built-up area near airports. Therefore the airspace change process must be sufficiently scalable to accommodate different types of proposal. By scalable, we mean that not all airspace change proposals necessarily need to be subjected to each and every element of the process. Consequently it is also very important that we set out clearly for change sponsors and those potentially impacted where the process may be subject to scaling.
78. Table 2 on page 26 illustrates how we categorise proposals for a permanent change to the airspace design into four 'Levels' depending on the characteristics of the change. For each Level we then apply the requirements of the process in a proportionate way. The CAA is under a legal duty not to apply the process in a manner that cannot accommodate any flexibility. We will therefore consider scaling the process further when there is a good reason and it is proportionate to do so. If a change sponsor considers that a specific proposal warrants a departure from the process, it must raise and minute this request at the assessment meeting. Any proposed changes to the process must be approved and published by the CAA.
79. The Levels are in part based on the altitude and area in which the changes occur. Broadly, the impact of any permanent change to the notified airspace design in the Aeronautical Information Publication will fall into one of these categories.

13. CAP 760 Guidance on the Conduct of Hazard Identification, Risk Assessment and the Production of Safety Cases: For Aerodrome Operators and Air Traffic Service Providers www.caa.co.uk/cap760

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Table 2: Summary of scaling of a permanent change to the airspace design (see next page for notes)

Level 1: High impact* changes to notified airspace design A change that <u>does</u> have the potential to alter traffic patterns below 7,000 feet over an inhabited area[§]	Level 2: Medium to low impact* changes to notified airspace design A change that <u>does not</u> have the potential to alter traffic patterns below 7,000 feet over an inhabited area[§]
The Government's Air Navigation Guidance states that below 7,000 feet is the maximum height at which noise is a priority for consideration	
Level 1: Typically a large-scale change which alters lateral aircraft tracks or dispersion, or changes aircraft height, below 7,000 feet (above mean sea level) over an inhabited area[§], such as: • changes to departure and arrival routes at airports • changes which have a significant impact on other aviation stakeholders	Level 2A: Typically a change which alters aircraft tracks, or changes aircraft height, below 20,000 feet (above mean sea level) but at or above 7,000 feet (above mean sea level), such as: • changes to Air Traffic Service (ATS) routes • establishment of new controlled airspace below 20,000 feet (above mean sea level). Level 2B: Typically a change: • to controlled airspace that occurs over the sea or at 20,000 feet (above mean sea level) and above, or • outside controlled airspace at or above 7,000 feet (above mean sea level) Level 2C: Typically a change which reflects: • the current use of the airspace concerned, such as a DCT*** to ATS Route, or • the removal of established airspace structure (such as Standard Instrument Departure truncation) and which does not alter traffic patterns below 7,000 feet (above mean sea level)
Level 0: Changes to nomenclature or qualifying remarks** of the notified airspace design A change that <u>will not</u> alter traffic patterns Also applicable to the establishment of, or changes to, Visual Reference Points	Level M: Changes to notified airspace design by Ministry of Defence Level M1: a proposed change where an anticipated consequence is an alteration of civil aviation traffic patterns below 7,000 feet over an inhabited area[§] Level M2: a proposed change where the anticipated consequences are either (a) an alteration of civil aviation traffic patterns at 7,000 feet or above, or (b) no impact on civil traffic

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Notes to Table 2

- § The 'area' for the purposes of this table should be defined in accordance with the CAA's separate guidance on overflight. A summary appears on pages 15-17 of CAP 1616a, the Environmental requirements technical annex to this guidance www.caa.co.uk/cap1616a. This summary is itself drawn from CAP 1498 Definition of Overflight www.caa.co.uk/cap1498.
- * 'Impact' includes all potential impact: see for example [Appendix B](#) (environmental assessment) which describes how potential impacts must be assessed. This is because the real impact will not be known until the airspace change has been designed and implemented.
- ** 'Qualifying remarks' means those which relate to an existing airspace design published in the Aeronautical Information Publication.
- *** DCT means 'direct', a routing which can be flight-planned by an operator, but which is not a notified Air Traffic Service (ATS) route published in the Aeronautical Information Publication.

The CAA may depart from this scaling in exceptional circumstances where there are overriding national security or safety considerations. The Government requires the CAA to ensure that the aviation industry takes account of the elevation (height) of the specific surface level involved when developing its airspace proposals or seeking to amend its operational procedures. This is particularly the case when such proposals may affect airspace at an altitude lower than 7,000 feet (above mean sea level) and in circumstances where the actual height of the land directly beneath may be hundreds of feet or higher above sea level.

80. The categorisation of an airspace change proposal is not related to the size and capability of the change sponsor. So a proposal by a small regional airport could be Level 1 and a proposal by NATS, the biggest air navigation service provider in the UK, could be Level 2.

81. Level 1 changes will usually require more extensive consultation. The number of stakeholders potentially affected by a proposed airspace change will determine how extensive a consultation must be. We will normally require change sponsors to consult a wider range of stakeholders about Level 1 changes because of the priorities the CAA must give to environmental impacts when changes are below 7,000 feet, in accordance with the Government's Air Navigation Guidance.

82. As explained in more detail under Stage 2 of the process, change sponsors must undertake an options appraisal at Step 2B. This evidence base will determine the scope of the impact, and will be used by change sponsors when they develop their stakeholder consultation strategy. This means that in addition to the defined Levels, there is a general principle of scaling built into the process. For example, an airport with fewer local communities will have fewer people to make aware of the consultation. Therefore the resource a change sponsor will require for its consultation will depend on the extent of that impact.

83. The way the requirements of the process are scaled is set out in this guidance for each

Stage and in some cases these reference the more detailed appendices. The CAA retains a general discretion to scale the process as appropriate to the nature of the proposed change, as explained in paragraph 78, and may develop specific scaled processes for certain types of change and annex them to this guidance.

84. Where the particular facts or circumstances, in the CAA's view, require us to do so, the CAA may also require a change sponsor to provide more documentation or undertake requirements in addition to those set out in this document.

Level 0

85. In view of the minimal CAA discretion needed to consider such a change, the change sponsor is only required to complete Step 1A (of Stage 1) before the CAA makes its decision. There is a list of types of airspace changes that could be a Level 0 in Table A2 in [Appendix A](#). The change sponsor must identify whether its change is expected to be one of these types by ticking the appropriate box when it completes the Statement of Need. The CAA will review the Statement of Need and will use this information to decide whether the change will be a Level 0 change. If it is confirmed by the CAA as Level 0, the Statement of Need is published and the CAA's confirmation that it is Level 0 is published, but the change does not progress through the rest of the airspace change process.

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Level M

86. This Level is used for airspace changes sponsored by the Ministry of Defence, specifically those where directions to the CAA require the CAA, in reaching its decision whether to agree the change to the airspace design, to disregard the potential environmental impact of airspace changes where there is no impact on civil operations.

87. The CAA must, however, continue to take into account the potential environmental impact of civil operations resulting from an airspace change proposed by the Ministry of Defence. Therefore there are two types of Level M changes:

- those where an anticipated consequence of the change proposed is an alteration of civil aviation traffic patterns below 7,000 feet over an inhabited area¹⁴: these are categorised as **Level M1** and are treated in a similar way to Level 1
- those where the anticipated consequences of the change proposed are either an alteration of civil aviation traffic patterns at 7,000 feet or above, or no impact on civil traffic: these are both categorised as **Level M2** and are treated in a similar way to Level 2.

However, for the environmental assessment, the Ministry of Defence need only ever assess the anticipated environmental impacts of the consequential changes on civil aviation patterns. A change proposed by the Ministry of Defence that appears to meet the criteria of Level 0 must be submitted to the CAA with a Statement of Need and the CAA will decide whether it can follow the Level 0 process or must follow the Level M1 or M2 process, as applicable.

88. Outside the scope of Level M are some changes that the Ministry of Defence can make to the contents of the Aeronautical Information Publication that do not affect civil operations and do not require the CAA's permission or approval. These are listed on the online portal (see also paragraph 91).

Additional reasons for scaling the process

Release of controlled and segregated airspace

89. Where a sponsor proposes a change to the notified airspace design so as to remove or reduce the size of controlled or segregated airspace¹⁵, the CAA will consider allowing a reduced options appraisal and environmental assessment, unless the likely impact of releasing the airspace is difficult to predict. The change sponsor will still need to provide the CAA with a Statement of Need, and carry out appropriate consultation with aviation stakeholders impacted.

90. If as a result there are consequential changes to airspace arrangements within the remaining controlled or segregated airspace, such as changes to flight procedures, then the usual options appraisal requirements of the airspace change process will apply.

Unusual aerial activities published in the Aeronautical Information Publication

91. There are some changes to the Aeronautical Information Publication that relate to unusual aerial activity, aerial sporting or activities of a dangerous nature where regulatory oversight is not required (there is no need for the airspace change process to be used and therefore no need for a Statement of Need). A list of such changes is available in CAP 1618 at www.caa.co.uk/cap1618. The relevant industry organisation should contact the CAA (arops@caa.co.uk) to obtain guidance on the impact of the proposed change to aviation.

14. See footnote 13 on page 25.

15. Such as a Danger Area. This scenario differs from a Level 2C change in that the potential impact of the proposed change on traffic patterns below 7,000 feet (above mean sea level) is uncertain.

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This will enable the CAA to ensure that guidance may be provided relating to the requirements of timely coordination, notification and publication of details of the activity. This list is as comprehensive as we can reasonably make it, but the CAA reserves the right to request a Statement of Need for any change should it be deemed necessary.

Changes which are outside the scope of this guidance

Noise Preferential Routes

92. Aircraft departing from certain airports follow Noise Preferential Routes – set departure routes agreed by Government or local planning authorities – with the aim of providing certainty in respect of, and, where possible, minimising noise impacts on the ground. Noise Preferential Routes are not decided by the CAA nor covered by this guidance.

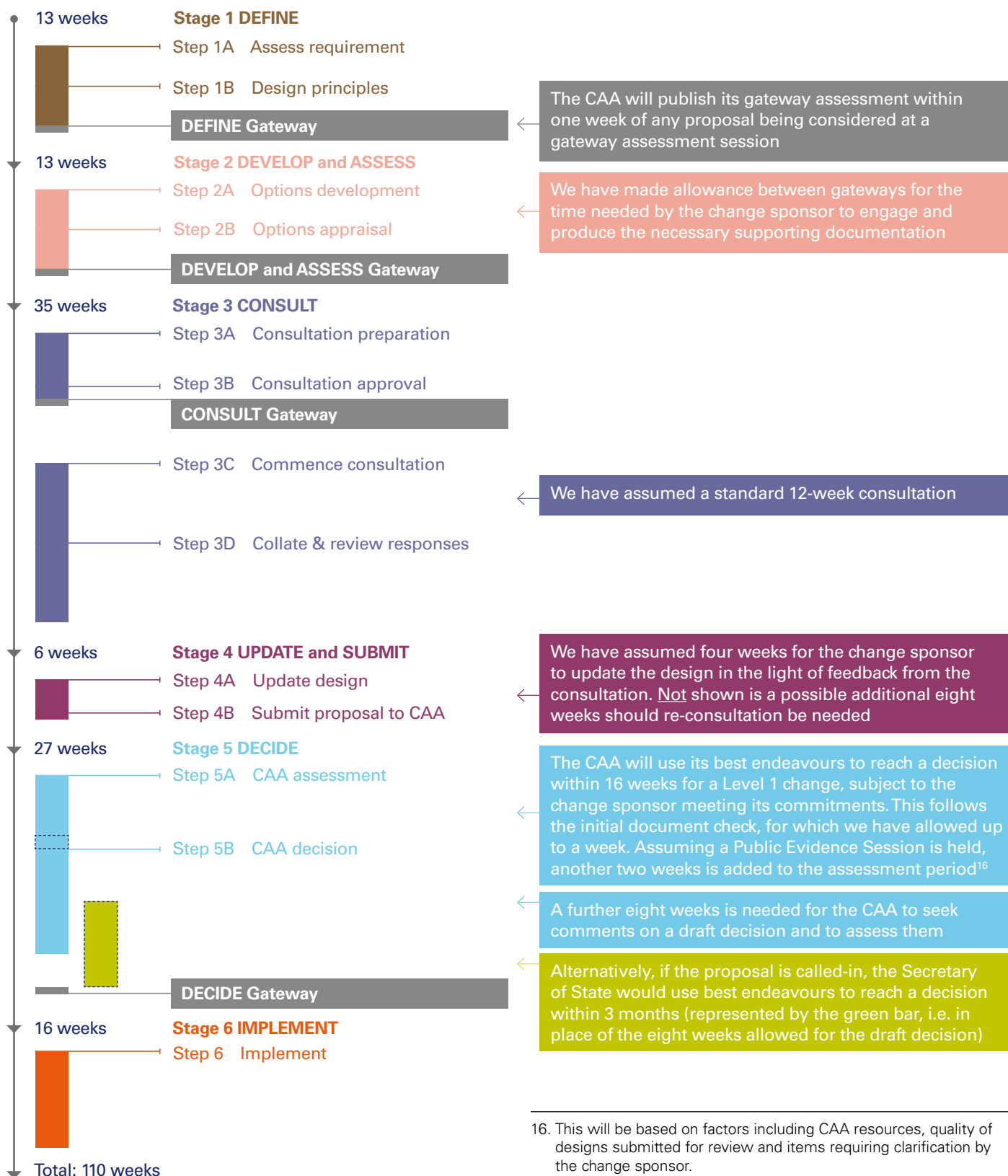
94. Nevertheless, it is possible to define how long some elements are likely to take, and we can build some overall guidance around this (see the indicative timeline in Figure 2 overleaf) to aid proportionality from a time-keeping perspective. In individual cases, the change sponsor will be required to submit a timeline for the CAA to review, agree and publish. The CAA will commit to timescales for decisions at each of the four gateway sign-offs, and for the decision on the final proposal, subject to change sponsors meeting their own commitments. Agreement on timescales will take into account submissions by other parties and CAA resources.

Timescales

93. The timescale for completion of the full airspace change process will inevitably depend on the complexity of the airspace design and the potential impacts of the change. These factors will determine the amount of design work and analysis of the impact of different options, the degree of consultation and engagement needed with those affected, and how quickly a solution can be developed that takes their views into account. Timescales will also depend on the amount of resource that the change sponsor can dedicate to developing the proposal and producing the associated documentation.

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Figure 2: Typical timeline for a Level 1 airspace change



Stage 1

Define

Process overview

Stage 1 DEFINE	Step 1A Assess requirement The change sponsor prepares a Statement of Need setting out what airspace issue or opportunity it is seeking to address. Having reviewed the Statement of Need, the CAA meets with the change sponsor to agree whether an airspace change is a relevant option to consider, and to have a first discussion about the appropriate scale of the airspace change process.
	Step 1B Design principles The design principles encompass the safety, environmental and operational criteria and strategic policy objectives that the change sponsor aims for in developing the airspace change proposal. They are developed through engagement with stakeholders and form a qualitative structure against which design options can be evaluated. Early engagement with stakeholders, optionally facilitated by a third party, may help to avoid disagreement later in the process.
DEFINE Gateway	

Introduction

95. The first stage of the process, the 'Define' stage, is divided into Step 1A, where the change sponsor prepares a Statement of Need setting out what airspace issue or opportunity it seeks to address, and Step 1B, the development of design principles. Step 1A is applied to all Levels of permanent change to the airspace design. Step 1B is applied to Levels 1 and 2 but not Level 0. Stage 1 completes with the CAA's sign-off of the 'Define' gateway.

Step 1A Assess requirement

96. Once a change sponsor has identified the need for a change in airspace design, the first step is for the change sponsor to prepare a Statement of Need. The change sponsor then meets with the CAA to discuss the need for a change and how the change sponsor will progress through the airspace change process.

Statement of Need

97. The Statement of Need must set out clearly the identified need as to why an airspace change is being considered. More information is at [Appendix A](#).
98. The change sponsor must be explicit in what issue or opportunity it is seeking to address and what outcome it wishes to achieve, without specifying solutions, technical or otherwise. The change sponsor initiates the airspace change process by submitting the Statement of Need to the CAA using the online form 'DAP1916' on the [CAA website](#), which the CAA will email back to the sponsor as the published version for it to upload to the portal, where it will be visible to all. The CAA will consider allowing the change sponsor to redact commercially (or national security) sensitive material from the published version.

Stage 1

Define

For more information about:

- the **Statement of Need**, see **Appendix A**

[CLICK HERE](#)

99. The CAA's review of the Statement of Need determines whether the airspace change process should be initiated. If the change sponsor is seeking for the proposal to be considered as a Level 0 change, this must be clearly indicated in the Statement of Need.
100. The CAA will assign a case officer or account manager from the Airspace Regulation team who will act as a focal point for the change sponsor and who will contact the change sponsor to set up a formal assessment meeting. The determination of whether the airspace change process should be initiated will be the topic of the assessment meeting, and the outcome, together with the minutes of the assessment meeting, will be published on the online portal. The case officer or account manager may work with the change sponsor throughout or this role may be shared by different team members, depending on the best use of CAA resource.
101. The CAA regards Step 1A as the initiation of the process. It exists for the CAA to confirm that the proposal concerned falls within the scope of the formal airspace change process. As with other stages in the process, transparency is very important. A Statement of Need is always published on the online portal, even when it does not result in the initiation of the process. After the assessment meeting, the change sponsor may update the Statement of Need and the updated version will be published as 'Version 2' on the online portal. When the CAA verifies that the proposal falls within the scope of the airspace change process, the portal will contain the latest Statement of Need, indicated by a version number.

Reasons for airspace change

102. Below are some examples of particular issues or opportunities where an airspace change may be an appropriate response:

- a safety incident
- improving access to airspace
- reducing noise or other environmental impacts
- improving airspace efficiency or capacity
- new aircraft or air traffic management technology enabling new operational capabilities
- a change in legislation
- significant changes to traffic flows
- military requirements, such as a new aircraft type
- new or changed aviation infrastructure.

Examples of airspace change proposals

103. The above issues or opportunities may then give rise to an airspace change proposal in response. An airspace change is characterised by a change to the notified airspace design as published in the UK Aeronautical Information Publication. Examples include:

- a change in the classification of the airspace¹⁷
- new, or changes to, Standard Instrument Departure Routes, Standard Arrival Routes or other published arrival routes within controlled airspace

17. 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.

Stage 1

Define

- introduction of, or significant changes to, holding patterns¹⁸
- changes to the lateral or vertical dimensions of Special Use Airspace such as Danger Areas, Restricted or Prohibited airspace, or Temporary Reserved Areas
- changes to the hours of operation of existing airspace structures
- delegation of air navigation services to an adjacent State.

104. An airspace change proposal is not needed for changes to correct for magnetic variation.¹⁹

Assessment meeting

105. Each airspace change proposal is different. 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. This is a fundamental first step in the airspace change process.

106. The CAA's role is to provide advice and guidance on what the airspace change process will require from the change sponsor, and how the CAA will evaluate the outputs throughout the process. There will be a discussion of whether and, if so, how the process is scaled according to the potential impacts of the proposal and the scaling 'Level'. The CAA will

refer to the guidance material for airspace change sponsors which is available on the online portal. The change sponsor will provide the CAA with its proposed target timescales (see 'Timescales' above). Agreement on timescales will have regard to submissions by other parties and CAA resources. The meeting minutes (or email exchange with the CAA, where appropriate) will record what is agreed on timescales.

107. In particular the meeting will cover the steps the change sponsor will need to take to ensure that it properly takes into account the impacts of any change on those affected and designs its proposal accordingly. These steps will include engagement with relevant stakeholders on the underlying design principles, drawing up a comprehensive list of options, appraisal of the impacts of those options, and formal consultation on the chosen option(s). In this way the change sponsor can collect the evidence necessary to develop a proposal which both meets its own needs while ensuring a proportionate impact on those affected. Those impacted may include the general public living beneath the existing and proposed airspace design, other airspace users, airports and air navigation service providers (more information about engagement is in [Appendix C](#)).

108. The outcome of the meeting will be a decision from the CAA on whether an airspace change is a relevant option to investigate, as well as a first, provisional indication of the appropriate scaling and Level. The CAA's confirmation of the Level will follow once the change sponsor has completed its option development and options appraisal (Steps 2A and 2B respectively). The change sponsor produces minutes of the assessment meeting and publishes these on the online portal as soon as they are agreed with the CAA and no later than 2 weeks after the meeting. This demonstrates to the CAA that the change sponsor has understood any guidance and advice that has been given (see paragraph A7 in [Appendix A](#)).

18. 'Significant' means a complete re-alignment or re-orientation of the hold, or a lowering of the minimum holding altitude.

19. Magnetic variation is the angle on the horizontal plane between **magnetic** north (the direction the north end of a compass needle points, corresponding to the direction of the Earth's magnetic field lines) and **true** north (the direction along a meridian towards the geographic North Pole). Variation changes as the position of the magnetic North Pole drifts, affecting compass bearings.

Stage 1

Define

109. The CAA will publish on the online portal its determination as to whether the proposal in the Statement of Need falls within the scope of the formal airspace change process. If a new version is submitted by the change sponsor, it will indicate clearly where changes have been made following discussions, and the CAA will be clear as to which version it determines falls within the scope of the airspace change process. The change sponsor will be asked to write to the CAA confirming whether or not it wishes to proceed with the development of a proposal.

Scaling of Step 1A

110. The Statement of Need will include questions to help identify the status of potential Level 0 and Level M changes and whether or not there is a requirement for the change sponsor to attend an assessment meeting. It may be possible to achieve the objectives of Step 1A by other means (for example, teleconference or email correspondence).

Outputs from Step 1A to be uploaded to the online portal (see page 23 regarding redactions)

Output	Produced and uploaded by
Statement of Need (full version or, where applicable, redacted final version)	Change sponsor
Assessment meeting minutes or email exchange with the CAA, where proposal in scope of the process (to include the proposed timescales for the process, and the CAA's provisional indication of the appropriate scaling Level)	Change sponsor
Determination on whether the proposal is in scope of the airspace change process	CAA

Step 1B Design principles

111. The second step of Stage 1 is for the change sponsor to identify and communicate the design principles to be applied to the airspace change design.
112. The design principles encompass 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 take account of government policy documents (such as the Air Navigation Guidance) and any local criteria such as planning agreements under Section 106 of the Town and Country

Planning Act 1990, or other planning conditions, and Noise Preferential Routes or other noise abatement procedures imposed on the airport by the Secretary of State under section 78 of the Civil Aviation Act 1982 or by the Local Planning Authority. The sponsor must have up-to-date knowledge of local plans and undertake relevant engagement with local authorities while developing design principles. The design principles form a framework against which airspace change design options can be evaluated. Once a change sponsor begins to select technical solutions that meet the intended need, it must then ensure compliance with regulatory guidance (see [Appendix F](#)).

Stage 1

Define

113. An important part of Step 1B is for the design principles to be drawn up through discussion between the change sponsor and affected stakeholders at this early stage in the process. Local stakeholders will normally include local authorities elected representatives, local community groups, the airport consultative committee and representatives of local General Aviation organisations or clubs. The change sponsor may consider convening a focus group with a mix of representatives. In the case of changes with significant potential impacts, the CAA may recommend the use by the change sponsor of an independent third-party facilitator to make early engagement with stakeholders on design principles more effective. A facilitator may also be used in later formal consultation.

For more information about:

- **consultation and engagement**, see [Appendix C](#)
- **design principles**, see [Appendix D](#)
- **technical criteria**, see [Appendix F](#)

114. The aim is for there to be a good level of understanding by change sponsors as to what design considerations are important to stakeholders, such as predictable respite from noise for communities and access for General Aviation. This is a key stage in preventing misunderstanding or later disagreements by facilitating conversations, particularly concerning changes with more significant potential impacts. This should avoid significant iteration and re-work of the airspace change design stage, and should make the later consultation phase (Stage 3) more constructive.

115. The design principles will naturally be based around some fundamentals such as safety, throughput of traffic, and environmental impacts. But they must also be developed in a local context, in accordance with national policy.

They must address any local trade-offs that need to be made, for example by addressing whether aircraft should, as a priority, avoid flying over specific local areas or populations. Where possible these discussions must identify whether stakeholders can identify common priorities, although the CAA acknowledges that unanimous agreement on the principles may be unlikely. Some of the principles may contradict one another and some may be prioritised over others.

116. Design principles must be set through a two-way process and involve effective engagement. [Appendix C](#) (consultation and engagement) and [Appendix D](#) (design principles) respectively set out in more detail our requirements and guidance for this engagement and the design issues that might arise. [Appendix D](#) also sets out questions that the change sponsor may wish to consider. However, we are not requiring the change sponsor to carry out a lengthy or detailed consultation, since this will take place in Stage 3 of the process, although they may choose to do so if they see it as appropriate.

117. The change sponsor should follow any relevant best practice published by ICCAN during the early stages of an airspace change proposal when exploring options. ICCAN best practice may be relevant to development of design principles (for example considerations around noise mitigations).

118. The design principles and the outcome of the engagement activity must be submitted to the CAA for review. Where the change sponsor is unable to reach agreement with local stakeholders on commonly accepted design principles, the reasons for differing views must be recorded and drawn to the CAA's attention, with reasons given as to how and why the change sponsor developed and decided the final set of design principles.

Stage 1

Define

CAA acceptance of the change sponsor's development of design principles

119. The change sponsor's design principles provide a framework or reference point that it will use when drawing up, and later considering and comparing, all the options open to it to address the airspace issue or opportunity that it has identified and in respect of which it wishes to propose an airspace change.
120. The design principles are not criteria that will determine whether the final option proposed by the change sponsor to the CAA (Stage 4) is acceptable or not. The design principles will, however, 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).

Scaling of Step 1B

121. For Level 1, Level 2, Level M1 and Level M2 changes, the engagement expected at Step 1B will be with:
- directly affected local aviation stakeholders, including airspace users, air navigation service providers and airports
 - relevant members of the National Air Traffic Management Advisory Committee

- relevant aviation/non-aviation national organisations, including those which represent areas/interests likely to be affected by potential impacts.

and, for Level 1 and Level M1 changes, also with:

- elected representatives and/or environmental interest groups representing communities likely to be affected by potential impacts (such as noise or economic growth) associated with the change (see paragraph C12 in [Appendix C](#)).

122. Step 1B is not required for Level 0 changes.

123. However, the Level of the change will not be confirmed until Step 2B. Therefore, Step 1B may need to be revisited if a change is initially judged as likely to be Level 2. This would be where a change sponsor subsequently determines at Step 2B that its proposal could alter the distribution of traffic below 7,000 feet and is thus Level 1, requiring the change sponsor to re-engage and include affected communities. We envisage this to be a rare occurrence, but a change sponsor with a change initially judged as likely to be Level 2 may nevertheless wish to consider whether it should engage with communities and their representative organisations at the outset during Steps 1B and 2A.

Outputs from Step 1B to be uploaded to the online portal (see page 23 regarding redactions)

Output	Produced and uploaded by
Airspace change proposal design principles	Change sponsor
Explanation of how these were influenced through the engagement process	Change sponsor
Acceptance of change sponsor's design principles	CAA

Stage 1

Define

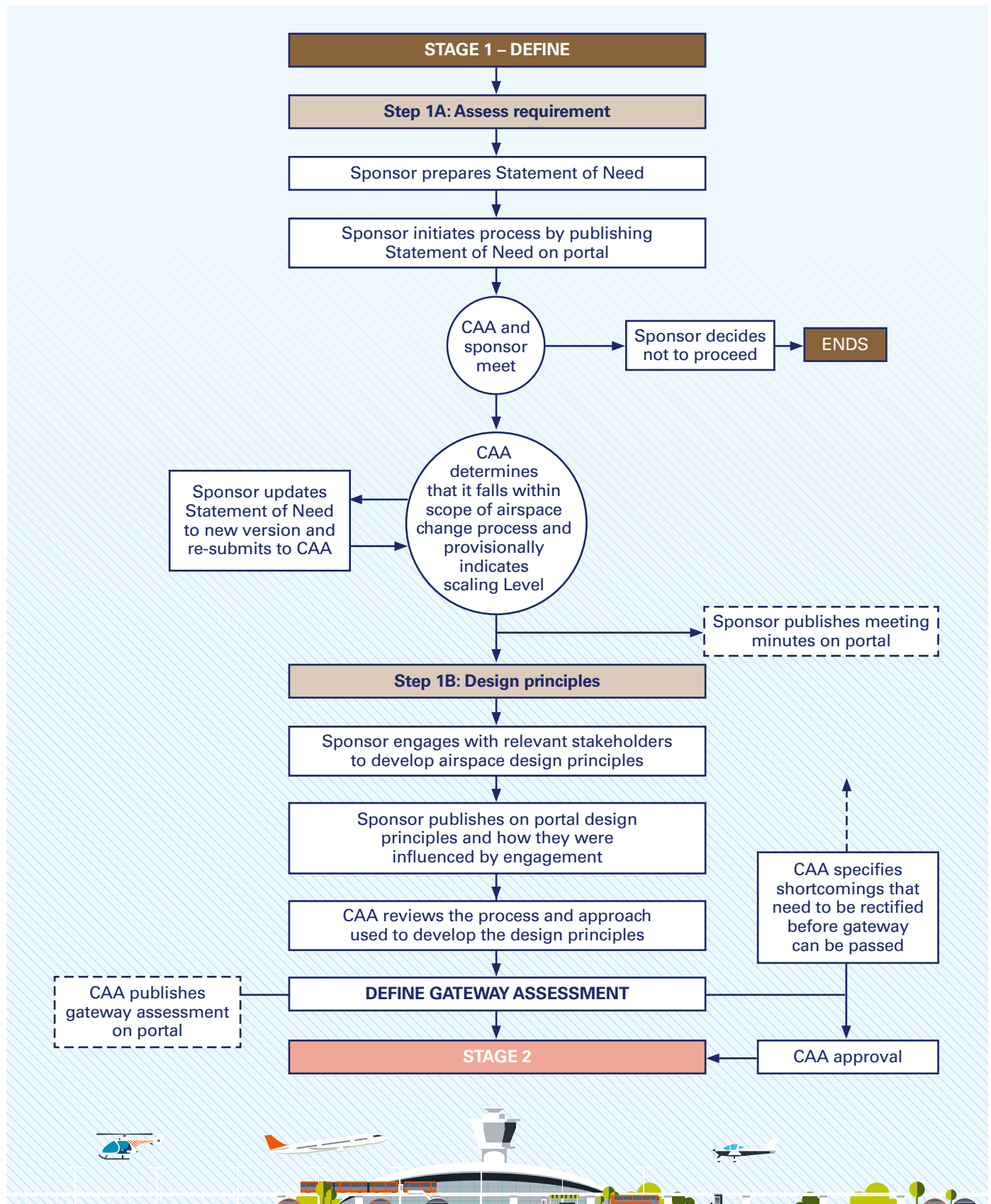
DEFINE GATEWAY

In order for the CAA to sign-off the 'Define' gateway:

- the change sponsor must have produced a Statement of Need and the CAA has determined that an airspace change is an appropriate option to consider against the requirements in **Appendix A**
- the change sponsor must have met with the CAA to discuss the airspace change process (unless a meeting was not required) and demonstrated that it understands what will be required of it
- the CAA must have agreed the change sponsor's proposed timescales
- the change sponsor must have produced design principles
- the change sponsor must have explained to the CAA's satisfaction how the design principles were influenced through stakeholder engagement against the requirements in **Appendix D**
- the CAA must have accepted the process and approach used to develop the design principles against the requirements in **Appendix D**
- the CAA must have accepted the design principles as a well-founded shortlist of principles to inform the development of airspace design options

Stage 1

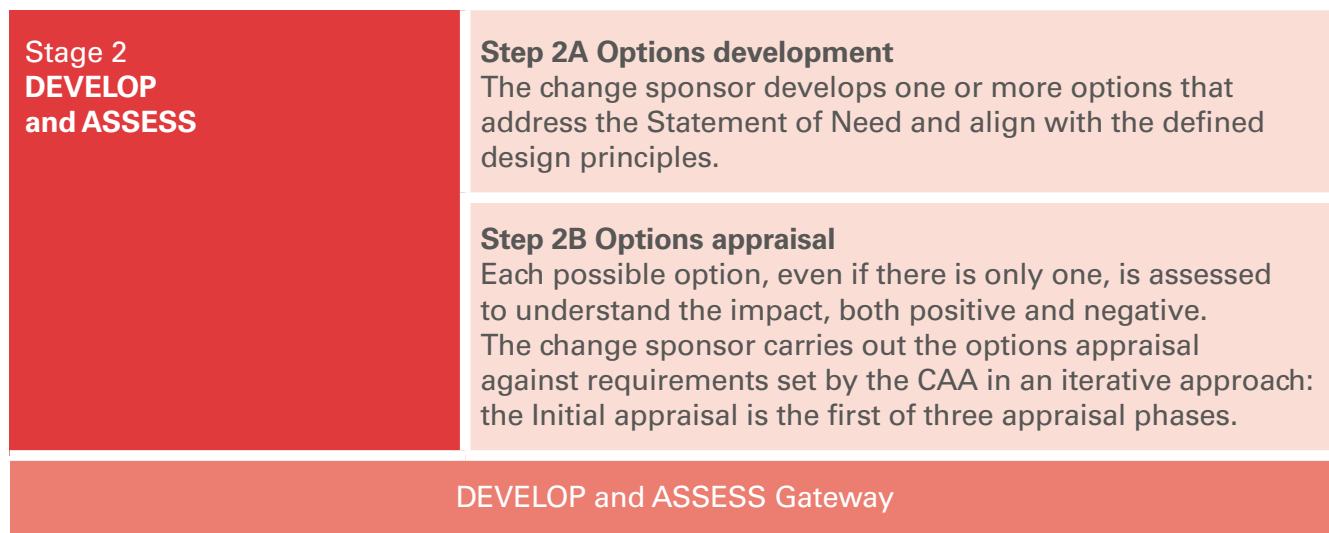
Define



Stage 2

Develop and assess

Process overview



Introduction

124. Having passed the 'Define' gateway, Stage 2 is where the change sponsor develops options for the airspace change. In Step 2A, the change sponsor develops a comprehensive list of options that address the Statement of Need and that align with the design principles from Stage 1. In Step 2B the change sponsor carries out an 'Initial' appraisal of the impacts of the different options, which it will later refine. Stage 2 completes with the CAA's sign-off of the 'Develop and Assess' gateway.

Step 2A Options development

125. Step 2A requires the change sponsor to develop a first comprehensive list of options – to the extent that a list is possible – that address the Statement of Need and that align with the design principles from Stage 1. The change sponsor preliminarily tests these with the same stakeholders it engaged with in Step 1B to ensure that they are satisfied that the design options are aligned with the design principles and that the change sponsor has properly understood and accounted for stakeholder concerns specifically related to the design options. The change sponsor then produces a design principle evaluation

that sets out how its design options have responded to the design principles.

126. The change sponsor must bear in mind that the option that is eventually chosen must be compliant with the relevant technical criteria set out in the standardised format in the second half of **Appendix F**. These criteria form the basic structure on which the change sponsor can build a formal proposal. It is vital that the change sponsor identifies any critical interdependencies with neighbouring air navigation service providers (operational, technical or training) and establishes plans to resolve any issues that arise. The change sponsor may wish to evaluate particular options by undertaking simulations or, where there is technical innovation or a design technique that can only be validated through an operational trial, by a live flight trial. Flight trials would be subject to a separate airspace trial process.

For more information about:

- **consultation and engagement**, see [Appendix C](#)
- **design principles**, see [Appendix D](#)
- **options appraisal**, see [Appendix E](#)

Stage 2

Develop and assess

127. Sometimes there will only be limited scope for multiple design options, with few realistic options available. This could, for example, be because of international standards or the physical constraints of adjacent airspace or flight procedures. Where this is the case, change sponsors must explain to stakeholders and the CAA why this is the case, with appropriate evidence.
128. The change sponsor publishes the list of design options and the design principles evaluation on the **online portal** that allows the CAA and stakeholders to review how the change sponsor's design options have responded to the design principles. At this stage, the CAA does not assess the appropriateness of any of the individual options, nor do we approve the airspace change. We simply consider, and where appropriate give approval as part of the Stage 2 'Develop and assess' gateway assessment that the change sponsor has in our view:
- identified all the possible options
 - evaluated the design options against the design principles in a fair and consistent manner
 - ensured, as far as possible, that stakeholders are satisfied that the design options are aligned with the design principles and sponsors to set out how decisions they have taken relate to stakeholder feedback
 - evaluated that the design options are compliant with the required technical criteria.

129. **Appendix D** and **Appendix E** set out more detailed guidance on the design development and evaluation process.

Scaling of Step 2A

130. The CAA will scale its process requirements for Step 2A in the same way as at Step 1B above. Note the point above that the Level is only confirmed at Step 2B and that Steps 1B and 2A may need to be revisited.
131. Military sponsors of airspace changes must complete Step 2A. However, where the Ministry of Defence's proposed change is not anticipated to impact on civil operations, the Secretary of State has directed that the CAA must not take into account the environmental impact of the proposed change when making our decision (at Stage 5). Therefore, in such cases the Ministry of Defence need not preliminarily test its options appraisal with communities affected by potential impacts. However, for a Level M1 change, a military proposal anticipated to affect civil operations must take the environmental impact of those effects into account. Therefore in this scenario the Ministry of Defence must discuss options with local communities.
132. Step 2A is not required for Level 0 changes.

Outputs from Step 2A to be uploaded to the online portal (see page 23 regarding redactions)

Output	Produced and uploaded by
Airspace change design options	Change sponsor
Design principle evaluation	Change sponsor

Stage 2

Develop and assess

Step 2B Options appraisal

133. Step 2B requires the change sponsor to carry out an 'Initial' appraisal of the impacts of each of the viable options identified in Step 2A using the design criteria against which the options are being assessed (the first of three iterative phases of options appraisal, as explained below). The Initial appraisal should, as a minimum, contain qualitative assessments of the different options. This highlights to change sponsors, stakeholders and the CAA the relative differences between the impacts, both positive and negative, of each option. The change sponsor assesses each option against a 'do nothing' scenario (the 'counterfactual'), even where there is only a single change option, to understand these impacts.

Overview of options appraisal

134. The CAA acknowledges that airspace change decisions cannot be reduced to an entirely numerical exercise. Numerical values are not a substitute for policy direction on which outcomes are important in the design of airspace. However, a systematic process that includes quantification of the costs and benefits of a particular airspace change proposal helps to provide consistency in options appraisal for all concerned. It also provides additional data helping the CAA to make the best possible decision against a background of increasing scarcity of airspace capacity.

135. The appraisal must be modelled on the factors that the CAA is required to consider under section 70 of the Transport Act 2000. To minimise the risk of a change sponsor being accused of skewing evidence and detail towards its favoured option, options need to be appraised in a consistent way in each phase, including 'do nothing' comparisons. This appraisal therefore needs to be objective, repeatable and consistent against defined criteria.

136. The change sponsor submits its options appraisal to the CAA for review after each phase. The CAA prepares its own assessment

of the appraisal in the form of a review paper, and publishes this on the online portal (see [Appendix E](#)).

For more information about:

- **environmental metrics and assessment**, see [Appendix B](#)
- **options appraisal**, see [Appendix E](#)

137. Wherever possible, the 'Full' options appraisal (the second of the three iterative phases of options appraisal, as explained below, which does not occur until Step 3A) must seek to monetise impacts adopting the rigour, structure and approach of a cost-benefit analysis. [Appendix E](#) sets out what is required:

- how the change sponsor will assess each airspace change option, including:
 - the criteria against which options are to be assessed
 - the preferred methodologies and tools for the analysis
 - how to monetise costs and benefits for the specified criteria
 - instances where numerical values would be overridden by policy considerations, and
 - what those policy aims are
- how the analysis helps to identify those who should be consulted on the airspace change proposal at Stage 3, and
- any challenges associated with gathering the necessary data to inform that position.

138. More specific guidance on assessing the environmental impacts of an airspace change – including noise, CO₂ emissions and local air quality – is contained in [Appendix B](#). This describes the relevant methodologies and metrics that the CAA will use for its environmental assessment.

Stage 2

Develop and assess

139. Each 'people overflown' metric used in the appraisal must apply national policy and therefore include housing, hospitals, schools etc that have planning permission. It must also have regard to local plans, such as what is anticipated under Local Development Frameworks, which will require the change sponsor to engage as needed with local authorities and local communities. While it may not be easy for sponsors to take account of every potential future building development, we expect them to engage the relevant local authorities and reach an agreement about how to interpret and take account of the Local Development Frameworks.

140. The appraisal must use WebTAG²⁰, the Department for Transport's appraisal guidance, for health impacts associated with noise, and potentially for other impacts, where possible.

Safety assessment

141. As explained in paragraph 75, at Step 2B of the process, the change sponsor must provide an initial indication of safety implications for each option. As with other evidence required for the options appraisal, we expect the detail of the safety assessment to increase further along in the process. This is explained further in **Appendix E** (paragraphs E45 to E54). The CAA will review the final safety assessment as part of its decision-making, in accordance with Government policy and legislation – noting that section 70 of the Transport Act 2000 states that the CAA must "maintain a high standard of safety".

142. A change sponsor is not expected to undertake a detailed safety assessment until Step 4B. At that point the sponsor must also provide a plain English summary of the safety assessment and the CAA will provide a plain English summary of its review (i.e. a summary of the Letter of Acceptance, which forms the CAA's review of the safety assessment) when it

makes a decision. These documents will be published on the online portal. The purpose of a summary is not to limit the information made available, but to ensure that it is clear and comprehensible. When the airspace change is likely to have a detrimental effect on a significant number of stakeholders (such as General Aviation or local communities), those stakeholders have a reasonable expectation that the change sponsor has demonstrated that it has properly considered the potential safety impacts of its proposal. The summary may exclude material which the CAA is satisfied should be kept confidential.

The link to the Government's Air Navigation Guidance

143. The methodology for options appraisal has been developed with the Government's input, so that it matches both the environmental assessment that the Government's Air Navigation Guidance specifies that we undertake and the evidence that the Secretary of State would need to review should the Secretary of State be the ultimate decision-maker (see Stage 5). The methodology is therefore dependent on government policy.

Phases of options appraisal

144. The change sponsor is required to carry out options appraisal for all viable options developing from the evaluation analysis at Stage 2A. Options appraisal evolves through three phased iterations, and the change sponsor is responsible from the first phase of the appraisal at Stage 2B.

145. Those phases are:

- 'Initial' appraisal (at Step 2B with the CAA review at the 'Develop and Assess' gateway)
- 'Full' appraisal (at Step 3A with the CAA review at Step 3B and the subsequent 'Consult' gateway)

20. For more information see <https://www.gov.uk/guidance/transport-analysis-guidance-webtag>.

Stage 2

Develop and assess

- ‘Final’ appraisal (at Step 4A, with the CAA review after the formal submission of the airspace change proposal at the end of Stage 4).
146. This builds the evidence base as the proposal matures, and is therefore a proportionate approach because it avoids the need for expensive detail on every potential design option. It is also more informative, by ensuring that the detail matures in line with the proposal, and that a reasonable evidence base is made available to all stakeholders early on and increasingly throughout the process. Thus less detail will be required for the Initial appraisal. For example, it may be based on qualitative information rather than quantitative analysis.

Scaling of Step 2B

147. All sponsors of Level 1, Level 2 and Level M changes will need to complete the options appraisal, as this is an essential piece of evidence in both understanding the impacts of the potential change and setting the Level of the change. However, there will be some scaling to the collection of evidence as the altitude-based priorities in the Government’s environmental guidance to the CAA differ and so require different analysis for Level 2 and Level M2 changes.
148. Step 2B is not required for Level 0 changes.

Outputs from Step 2B to be uploaded to the online portal (see page 23 regarding redactions)

Output	Produced and uploaded by
Options appraisal (phase I – Initial) including safety considerations	Change sponsor
Options appraisal assessment (phase I – Initial)	CAA
CAA approval of sponsor’s design principle evaluation	CAA
Confirmation of appropriate scaling Level	CAA

Stage 2

Develop and assess

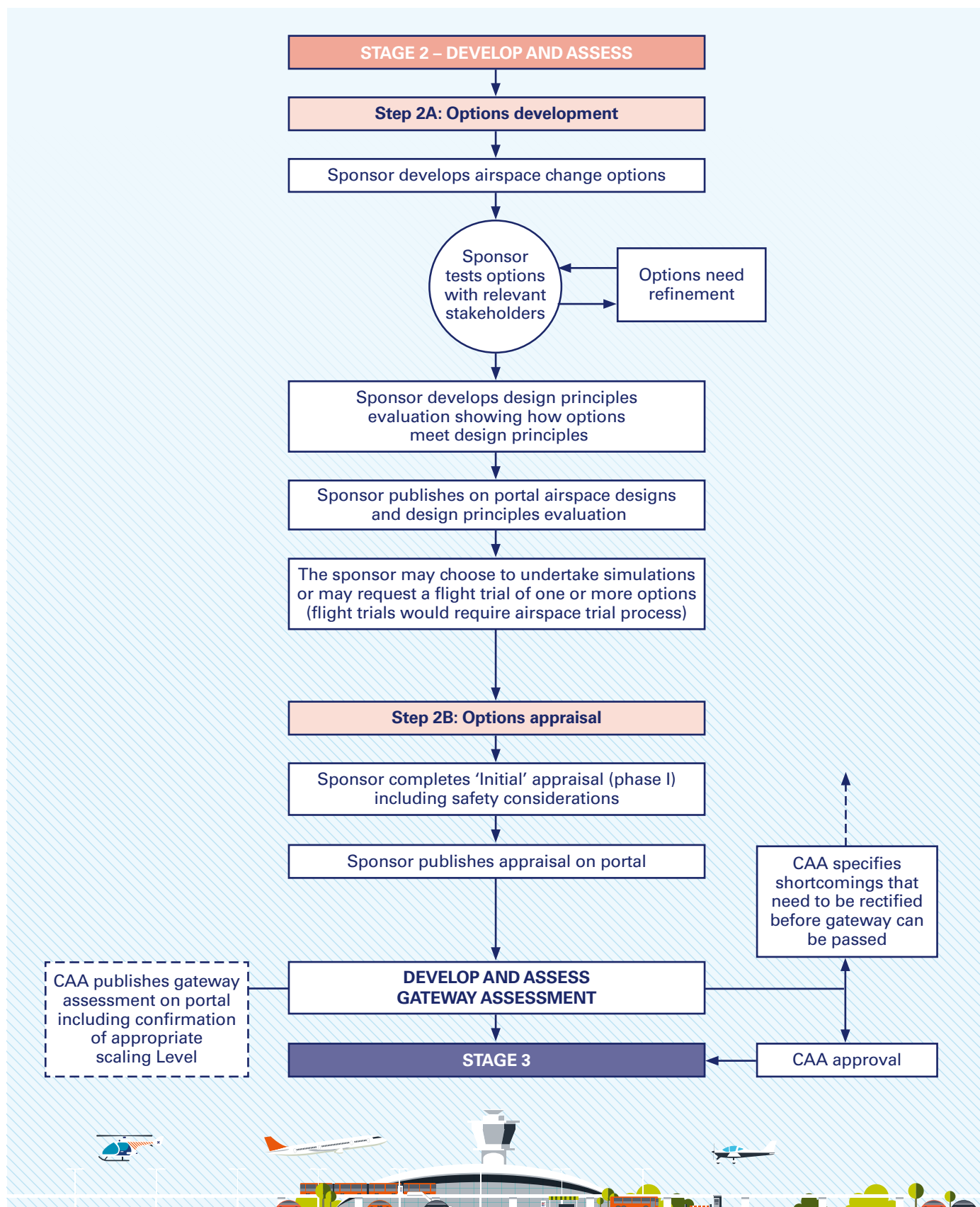
DEVELOP AND ASSESS GATEWAY

In order for the CAA to sign-off the 'Develop and Assess' gateway:

- the change sponsor must have produced a comprehensive list of airspace change design options
- the change sponsor must have engaged with relevant stakeholders to explore those options to the CAA's satisfaction against the requirements in [Appendix C](#)
- the change sponsor must have produced a design principle evaluation that the CAA has accepted, showing how its design options have responded to the design principles
- the change sponsor must have produced an Initial options appraisal (phase I)
- the CAA must have produced and then published an assessment that the options appraisal is satisfactory against the requirements in [Appendix E](#)

Stage 2

Develop and assess



Stage 3

Consult

Process overview

Stage 3 CONSULT	Step 3A Consultation preparation The change sponsor plans its stakeholder consultation and engagement, and prepares consultation documents, including the second-phase Full options appraisal with more rigorous evidence for its chosen option(s).
	Step 3B Consultation approval The CAA reviews and where appropriate approves the consultation strategy. This is to ensure the strategy is comprehensive, the materials clear and appropriate, and the questions unbiased.
CONSULT Gateway	
	Step 3C Commence consultation The change sponsor implements its consultation strategy and launches the consultation.
	Step 3D Collate and review responses Consultation responses made through the online portal are collated, reviewed and categorised.

Introduction

149. Having passed the 'Develop and assess' gateway, Stage 3 is where the change sponsor prepares and launches its formal consultation.
150. Stage 3 is where the change sponsor prepares its consultation strategy (Step 3A) including a more comprehensive Full appraisal of the option(s) it is proceeding with at this stage. The CAA reviews and where appropriate approves the consultation strategy and carries out a further review of the options appraisal in its Full version (Step 3B). Completion of Step 3B forms the third 'Consult' gateway in the process. The change sponsor then launches the consultation (Step 3C) and collates and reviews the responses (Step 3D).
151. The consultation phase is a key part of the airspace change process. It allows the

change sponsor to gather information and to understand views about the impact of a particular proposal. It allows consultees to provide relevant and timely feedback to the change sponsor. There may be differing views between different stakeholder groups.

152. If the overall process is to function correctly, it is crucial that the consultation is open, fair, transparent and effective, and that the CAA can evidence that it is holding the change sponsor to account in this respect. Stakeholders must also have confidence that the CAA is holding the change sponsor accountable both for the way it acts on the responses it receives and for providing timely feedback on those responses. Consequently the CAA reviews and approves all consultation material, and monitors the consultation process through the **online portal** on which all material and responses

Stage 3

Consult

are published (see [Appendix C](#)). This includes the CAA moderating consultation responses to remove material not appropriate for publication, publishing responses in batches during the consultation, and observing how the change sponsor is responding to those that require an immediate answer (using 'frequently asked questions' if necessary).

153. An unsatisfactory consultation, for example with consultation documents needing to be amended and re-issued, not only increases the cost and timescales for the change sponsor, but also loses the confidence of those being consulted.

154. Key consultation requirements are that:

- the CAA approves the consultation material
- meaningful material is available in a form that does not require technical knowledge to understand and respond to it
- a clear statement of the current situation is given, as well as clarity on what changes are being proposed
- stakeholders reading the consultation – including those with no technical expertise – can understand the potential impact of the proposed changes on them, and any technical information is available in a form that does not require technical knowledge to understand and respond to it
- the change sponsor considers ICCAN's best practice on aviation noise for participants in the airspace change process, and where the sponsor deviates from that guidance, explains why
- all consultation material is published on the online portal, including
 - the consultation itself and any supporting material
 - all formal responses to the consultation
 - the change sponsor's categorisation of responses into those that may lead to a change in the design and those that could not

- frequently asked questions about the consultation and the change sponsor's replies
- Citizen Space consultation page (created not launched, such that the CAA can review the page prior to being published).

155. With the post-implementation review (Stage 7) in mind, the change sponsor must make clear to stakeholders in the consultation documents the extent to which the proposed airspace change, once implemented, is reversible if it does not achieve the objectives it is designed to achieve. Changes that accommodate mandatory new technology or which have strong interdependencies may be very difficult or even impossible to reverse. Therefore where an airspace change has not achieved its objectives, the solution may need to be a redesign rather than reversion to the pre-airspace-change position.

156. [Appendix C](#) sets out more detailed guidance on the consultation requirements of Stage 3. Where there are requirements in this section or [Appendix C](#), they are minimum standards which the change sponsor can build upon if local circumstances require. A change sponsor must consider best-practice examples set out in this document and elsewhere when developing its approach to consultation and engagement.

Full options appraisal

157. As noted at Step 2B, the options appraisal evolves through three phased iterations, with the CAA reviewing the information in the appraisal at each phase. As detailed in [Appendix B](#) and [Appendix E](#), the second 'Full' phase to be completed in Step 3A requires the change sponsor to develop more rigorous evidence for its remaining option(s), compared as before with a 'do nothing' option. Although there is no requirement for a change sponsor to undertake further safety work at this stage, where a sponsor has done so, it must include that information in the package of consultation documents.

Stage 3

Consult

158. After review by the CAA at Step 3B and sign-off at the 'Consult' gateway, the change sponsor must include the options appraisal in the package of documents on which it consults at Step 3C. This assists the change sponsor in identifying potential impacts and mapping potentially affected stakeholders, and allows those being consulted to see the potential impacts of different options and provide more information or comment. The responses to the consultation then allow the change sponsor to update the options appraisal in the light of any new information (and if necessary re-consult, as explained on page 59).

Scaling of Stage 3

159. The extent of consultation and supporting materials, and the supporting activities needed, for example public meetings (possibly using a third-party facilitator), focus groups or surveys, digital channels, will depend on the scale and nature of the airspace change, in particular whether it is Level 1 or Level 2.

160. Level M1 changes will require a consultation. However, the consultation strategy will need to reflect that the Secretary of State has directed the CAA not to take into account the environmental impact of military aircraft and operations. Therefore for a Level M2 (which is anticipated either not to affect civil operations or not to affect civil operations such that the distribution of traffic changes below 7,000 feet) there is no requirement to consult with communities. There remains a requirement to consult with aviation industry stakeholders, but the CAA may agree to a shorter consultation period than would apply for the equivalent Level 1 or Level 2 change.

161. Stage 3 is not required for Level 0 changes. Aside from Level 0 changes, consultation is usually the minimum expectation for Stage 3. At this stage in the process, it would not be appropriate to replace formal consultation with informal stakeholder engagement.

162. The scale of consultation will have been discussed already at the assessment meeting with the CAA at Step 1A. The likely effectiveness of the consultation will be an important part of the CAA's approval of the consultation strategy documents and supporting material at the 'Consult' gateway.

Step 3A Consultation preparation

163. Step 3A requires the change sponsor to decide on its consultation strategy and to prepare the consultation documents. The aim of consultation is that stakeholders who may be affected, both positively and negatively, have an appropriate opportunity to comment on proposals based on a reasonable understanding of them. Enough information must be provided for those consulted to have the opportunity to understand the impacts and trade-offs and can give informed responses.

164. **Appendix C** includes guidance describing best practice in effective approaches to engagement, consultation material and activities. As noted at Step 1B, open consultations, and the wider stakeholder engagement necessary to facilitate effective consultation, could benefit from change sponsors appointing an independent third party to act as a neutral facilitator and to moderate interaction with stakeholders, at least for airspace changes with a potentially significant impact. Where appropriate, the change sponsor may therefore seek the advice and support of external experts in consultation and public engagement.

For more information about:

- **consultation and engagement**, see [Appendix C](#)
- **options appraisal**, see [Appendix E](#)

Stage 3

Consult

165. The overriding aim is to ensure anyone who may be affected by a change can see and understand what is proposed, and respond in the knowledge that the CAA is holding the change sponsor to account against the requirement to facilitate a meaningful consultation.
166. The change sponsor must develop an appropriate, targeted consultation strategy to facilitate airspace change consultation. We appreciate the complexities associated with consulting with all potentially affected stakeholders, including the number of people and audiences involved, overcoming past 'history', conflicting airspace priorities, and the technical nature of some proposals. Engagement with local representatives such as local authorities, airport consultative committees and local groups may assist the change sponsor in developing its consultation strategy.
167. We note that different audiences have different requirements. The scale and nature of consultation required will also differ depending on the number and nature of affected stakeholders as well as the nature and scale of impact upon them. Using a Full version of the options appraisal developed at Step 2B, which narrows the options to one (or to a shortlist), the change sponsor draws up a consultation strategy. This must cover:
- who may be affected, positively or negatively, by the change (audience map) and what their information needs are (including consideration of any seldom-heard audiences)
 - how the change sponsor will inform them of the consultation (assessment of communication requirements)
 - how consultation and supporting materials will be developed to suit a range of audiences, such as how technical information will be communicated in an accessible way
 - what opportunities audiences (including those with no internet access) will have to engage and respond (channels used), at which times (timetable of activity), including the period of the consultation; the CAA recognises the complexities of planning large-scale consultations, so at this stage specific venues and dates are not necessary
 - what steps will be taken to minimise the chances of the consultation strategy failing and to generate an appropriate level of participation and response if the strategy does fall short of expectations (safeguards and further options)
 - the use by the change sponsor of the most up-to-date and credible, clearly referenced sources of data, with modelling carried out in line with relevant best practice.
168. Where stakeholders include specific communities, the change sponsor must prepare a strategy as to whether or not any properties need to be contacted individually, or set out other reasonable methods of reaching communities (such as through local media, social media, local authority communications, or advertising). The change sponsor must use **Appendix C** to consider which other organisations, groups or communities should be consulted. For example, where a change may impact on General Aviation's access to airspace, the change sponsor may need to communicate directly with local flying clubs and schools, as well as with the national bodies representing these types of activity. An airport may find it useful to use the airport consultative committee, or its local noise management body, as one initial basis for a focus group.
169. The change sponsor submits the consultation strategy and the draft consultation documents to acp.submission@caa.co.uk for approval prior to them being published on the online portal (see **Appendix C** for more on what the CAA will require).

Stage 3

Consult

Scaling of Step 3A

170. The duration of the consultation must be proportionate to the scale of change and the numbers of potentially affected stakeholders, and will be advised by the CAA using any relevant government guidance or best practice. The accepted standard is that consultations should last for 12 weeks. Where a change sponsor provides a strong rationale, the CAA

will consider a reduced consultation period where the request is reasonable and this is a proportionate solution. Where a consultation period falls over holiday periods, it may be necessary for the change sponsor to lengthen the consultation period to give local committees and national bodies time to consult their members.

171. See 'Scaling of Stage 3' above regarding Level M and Level O changes.

Outputs from Step 3A to be emailed to the CAA for approval	
Output	Produced by
Draft consultation strategy	Change sponsor
Draft consultation documents	Change sponsor
Options appraisal (phase II – Full)	Change sponsor