

Outcome of the consultation on the Airspace Classification Review 2019/20

CAP 1935



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Civil Aviation Authority

Aviation House

Beehive Ring Road

Crawley

West Sussex

RH6 0YR

Enquiries regarding the content of this publication should be addressed to:

airspace.modernisation@caa.co.uk

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Chapter 1

The consultation

Purpose of this document

- 1.1 In December 2019, the CAA launched a consultation asking you to help us identify volumes of controlled airspace in which the classification could be amended to better reflect the needs of all airspace users on an equitable basis.
- 1.2 This document outlines the content of the responses received and how the CAA plan to take these forward once the new procedure to review and amend airspace classifications has been developed and implemented at the end of 2020. This document is not seeking further views.

Background

- 1.3 In October 2019, the Secretary of State wrote to the CAA to amend the 2017 Air Navigation Directions. The Directions set the CAA's functions, meaning the role we must carry out with respect to airspace. Direction 3 states that the CAA must:
- (a) develop and publish a national policy for the classification of UK airspace*
 - (b) classify UK airspace in accordance with such national policy, publish such classification, regularly consider whether such classification should be reviewed, carry out a review (which includes consultation with airspace users) where the CAA considers a change to classification might be made and, as the CAA considers appropriate, amend any classification in accordance with procedures developed and published by the CAA for making such amendments;*
 - (ba) in developing the national policy referred to in sub-paragraph (a), classifying UK airspace under sub-paragraph (b), or amending the classification of a volume of airspace under that sub-paragraph, seek to ensure that the amount of controlled airspace is the minimum required to maintain a high standard of air safety and, subject to overriding national security or defence requirements, that the needs of all airspace users is reflected on an equitable basis;*
- 1.4 This means the CAA must:
- regularly consider whether to review the current classifications of airspace
 - consult airspace users as part of that review
 - where we consider a change to classification might be made, amend it ourselves in accordance with a new process that we must develop and publish

- in developing that procedure and our policy describing airspace classifications, seek to ensure that the amount of controlled airspace is the minimum required to maintain a high standard of air safety and, subject to overriding national security or defence requirements, that the needs of all airspace users are reflected on an equitable basis.

- 1.5 In response to this, the CAA decided to initiate a review of the classification of UK airspace in December 2019, in parallel with developing the new procedure. Taking into consideration the obligation to consult with airspace users before carrying out the review, this consultation sought to engage stakeholders by inviting them to each identify up to two volumes of airspace where amendments to current structures and access arrangements should be considered. Stakeholders were asked to identify the location of the opportunities as well as the flight level, and time of the day and year when the classifications could be amended. We asked respondents to provide a rationale and supporting evidence for their suggestions.
- 1.6 To support this request, the CAA published a number of visualisations of controlled airspace. These were ordered by geographical area of the UK (North, Central and South) and then by height (presented as four flight levels) and at representative times of the day.
- 1.7 Directions 3(a), (b) and (ba), mentioned in paragraph 1.3 above require the CAA to have a procedure for amending airspace classifications. That procedure is currently being developed, and is now undergoing a public consultation.¹ This means that the next steps the CAA takes on the volumes of airspace identified by respondents to our first review will be determined by the new procedure. The new procedure must be in place by 1 December 2020.

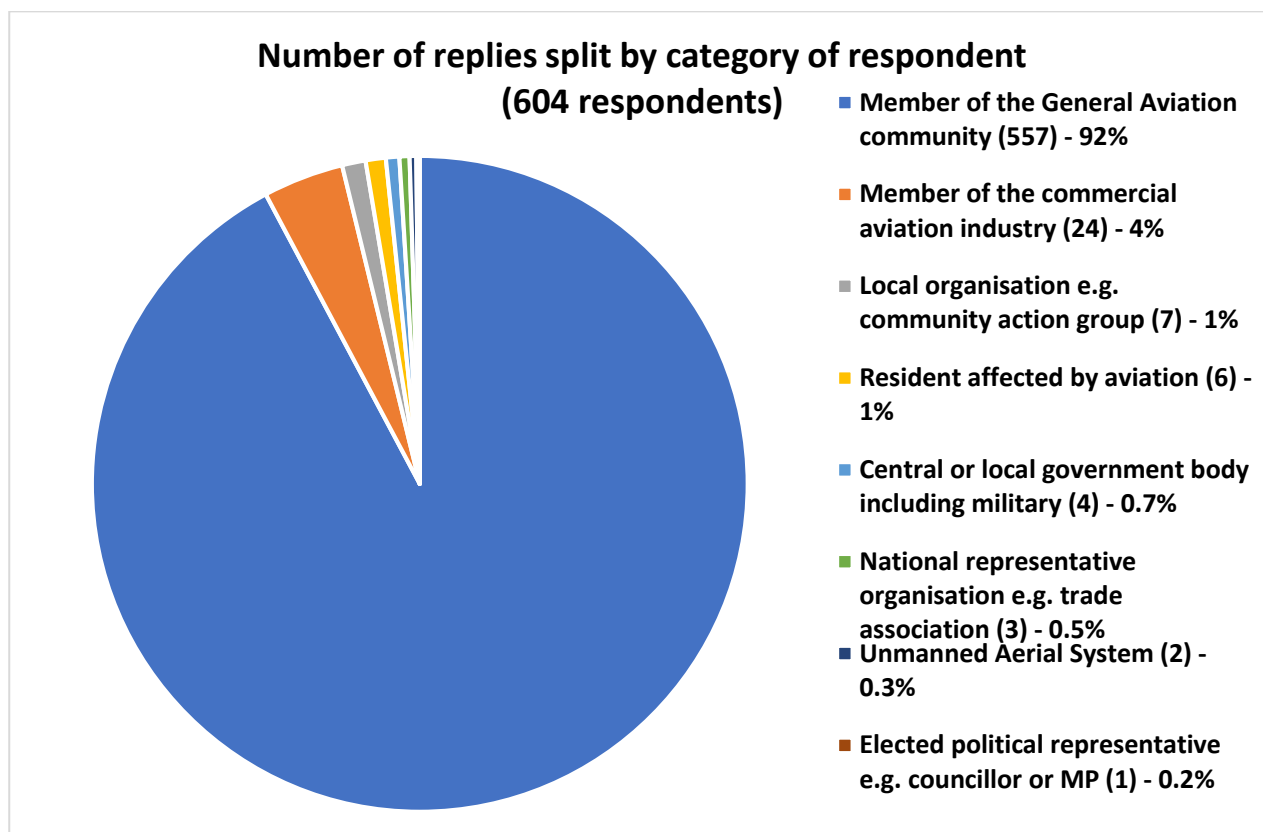
Who responded to this consultation

- 1.8 We had 604 responses in total, after removing duplications. Three respondents submitted more than one identical response, meaning there were 607 respondent entries. For the purposes of the analysis we have disregarded the second response, making the total received 604.
- 1.9 We asked respondents to categorise themselves into one of the following nine categories:
- Resident affected by aviation
 - Airline passenger

¹ <https://consultations.caa.co.uk/policy-development/draft-procedure-to-review-airspace-classification>

- Member of the General Aviation community, broken down further by:
 - Balloon
 - Fixed Wing 0-2 Tonne MTOW
 - Fixed Wing 2+ Tonne MTOW
 - Glider
 - Hang Gliding and Paragliding
 - Helicopter
 - Microlight
 - Model aircraft
 - Other. Please specify (free text box)
- Unmanned Aerial System Operator
- Member of the commercial aviation industry, broken down further by:
 - Airline
 - Airport
 - Air Navigation Service Provider
 - Business Aviation
 - Other. Please specify (free text box)
- Central or local government body including military
- Elected political representative e.g. councillor or MP
- National representative organisation e.g. trade association
- Local organisation e.g. community action group.

Figure 1.1 responses to the consultation by category of respondent



1.10 Of the 604 respondents

- 557 responses were from members of the General Aviation category
- 24 responses were from the commercial aviation industry of which 17 were from air navigation service providers and seven were from airports
- Seven responses were from local organisations/action groups.
- Six responses were from residents affected by aviation
- Four responses were from central or local government body including military
- Three responses were from a national representative organisation e.g. trade association
- Two responses were from Unmanned Aerial Systems Operators
- One response was from an elected political representative e.g. councillor or MP

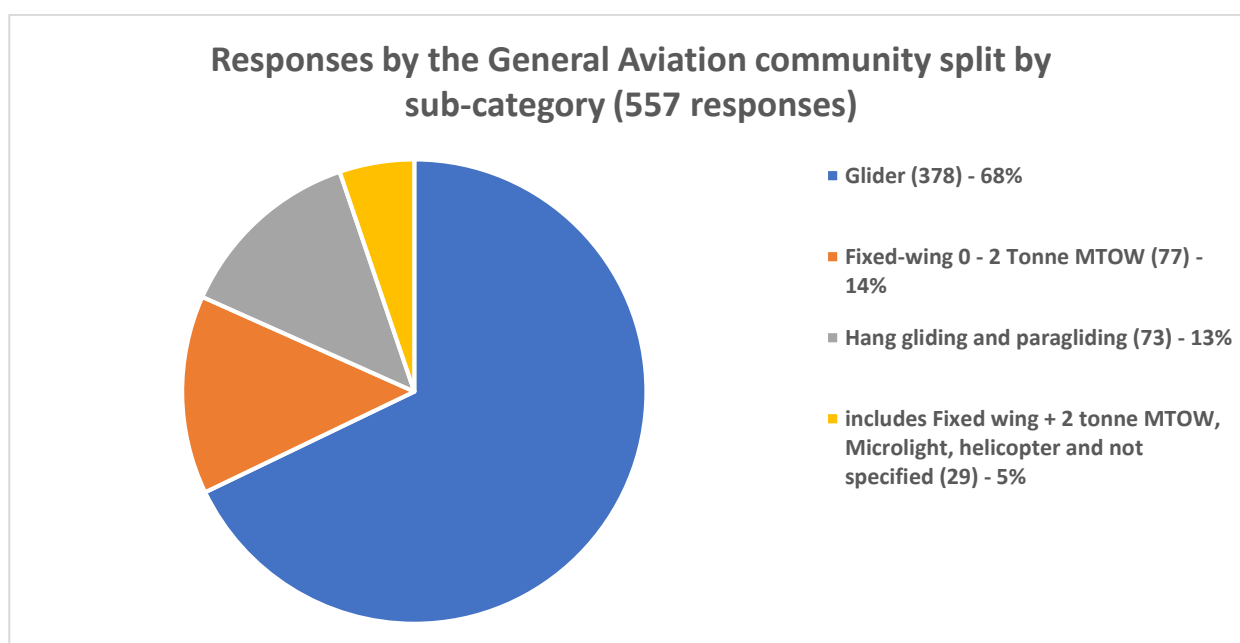
1.11 Several respondents identified themselves as answering on behalf of a non-general aviation category and then added a general aviation sub-category to reflect their personal flying activities. These included one representative from the central or local government body category, one elected political representative, four local organisations, three members of the commercial aviation industry, one

national representative organisation and one resident affected by aviation. In all these cases, we respected the main category that respondents had selected and excluded their data from the general aviation analysis.

1.12 There were two instances where respondents identified themselves as belonging to a local organisation e.g. community action group, but then went on to declare that they were not responding on behalf of that group. As in both these cases a general aviation sub group had been added, we have recategorised the responses to the general aviation category.

1.13 We had no responses in the airline passenger category.

Figure 1.2 responses from the General Aviation community split by sub category



1.14 The 557 responses from the general aviation community were broken down into sub categories as follows:

- 378 (68%) glider
- 77 (14%) fixed wing 0-2 tonne MTOW
- 73 (13%) hang gliding and paragliding
- 29 (5%) was made up of the remainder i.e. fixed wing 2+ tonne MTOW, microlight, helicopter and those where the sub category field was not completed.

1.15 No responses were received from model aircraft or other sub categories

1.16 A full list of respondents appears at the end of this chapter

Geographic spread of responses

- 1.17 The 604 respondents identified themselves as living, or responding on behalf of an organisation based in the following areas:
- South East (274)

▪ East of England (68)

▪ South West (61)

▪ Scotland (50)

▪ East Midlands (34)

▪ West Midlands (34)

▪ North West (29)

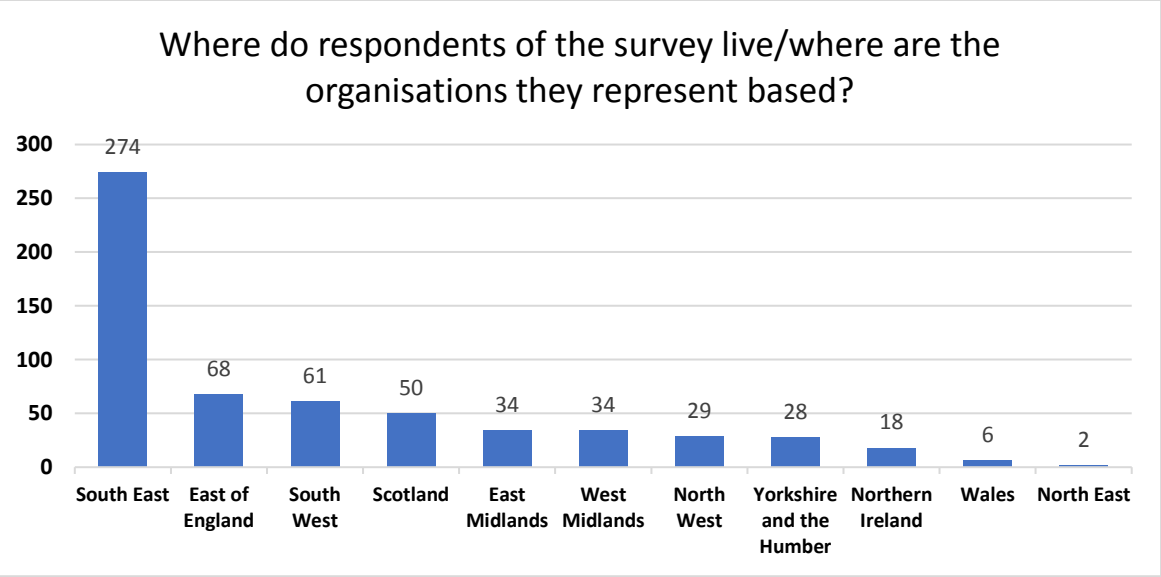
▪ Yorkshire and Humber (28)

▪ Northern Ireland (18)

▪ Wales (6)

▪ North East (2)

Figure 1.3 category of respondent by geographic region



Engagement regarding the consultation

- 1.18 To encourage a wide engagement in this initial review, on the day of launching the consultation the CAA contacted approximately 730 individuals and

organisations through a direct email and a further 13,000 through the CAA's Skywise platform. These communications advised that the Airspace Classification Review consultation had gone live, provided a link to the consultation and requested that all representative groups forward a copy to their members. Presentations were also given at meetings with the Industry Communications for the Airspace Modernisation Strategy group and the CAA's Unmanned Aerial System Forum. A reminder email was sent to all original recipients two weeks before the end of the 11-week consultation period, reminding stakeholders that the consultation would close on 3 March 2020.

1.19 Four stakeholder engagement events were held in January 2020. The first of these was in the form of an open information session, to which we invited all organisations listed in the CAA's Airspace Modernisation Governance Structure². To further fulfil the requirement for consultations with airspace users, this was followed by three roundtable discussions, to which we invited relevant representative groups in the Governance Structure. Two of these roundtables focused on attendees from the general aviation community and one was focused on commercial aviation and the Ministry of Defence. The Department for Transport attended all the events. Representatives from the following organisations and groups attended the roundtable sessions:

- Airspace4All
- Airport Operators Association
- General and Business Aviation Strategic Forum
- General Aviation Partnership
- Gatwick Airport
- Heathrow Airport
- Manchester Airport Group
- Ministry of Defence
- NATS

1.20 These events allowed us to explain in more detail the background and purpose of the review and how we planned to carry out the work, as well as providing more information on the supporting evidence supplied and how it might be used to inform responses. Attendees were invited to engage in a focussed

² As set out in the Airspace Modernisation Strategy (CAP 1711) and in more detail in [The Airspace Modernisation Governance Structure \(CAP 1711b\)](#).

conversation on what they felt the review needed to achieve, what evidence we should use and provide thoughts on how we might work with them to help deliver their desired outcome.

- 1.21 More detail on feedback from the engagement sessions can be found in Chapter 3.

Our analysis of the responses

- 1.22 The consultation asked respondents to identify two volumes of airspace, described as opportunities, that they were familiar with and where amendments to current structures and access arrangements could be considered.
- 1.23 Six open (free text) questions were asked for each opportunity. These questions were used to capture details of the volume of airspace in question, including the location, relevant flight level (height) and time of day when the change could be implemented. Respondents were also asked to provide a rationale and upload any supporting evidence for each of their suggested opportunities. This gave respondents an opportunity to outline why they were suggested and the potential benefits or dis-benefits. We were also interested in whether any local arrangements were currently in place, such as a Letter of Agreement³.
- 1.24 A general comments box invited further views on the purpose of the review and the project in general.
- 1.25 As well as detail on the suggested opportunities, respondents were able to use the open questions to raise any suggestions or ideas they wanted us to consider. We applied a basic qualitative research approach to analysing those responses, to identify key themes raised by respondents, which category of respondent raised them, and how often. Chapter 3 details some of the most significant themes listed in the free text responses, including some examples, where permission has been given by respondents to do so.

³ A Letter of Agreement is a formal agreement between two parties describing operational scenarios, associated procedures, the operational responsibilities placed upon each party and emergency contact information.

List of those responding to the consultation by category of respondent

Resident affected by aviation (6)

- Six individuals

Member of the General Aviation community⁴ (557)

- Avon Hang Gliding and Paragliding Club
- Bath, Wilts and North Dorset Gliding Club
- Bognor Regis Gliding Club
- Bristol and Gloucestershire Gliding Club
- British Microlight Aircraft Association
- Burn Gliding Club
- Cairngorm Gliding Club
- Cambridge Gliding Club
- Derbyshire and Lancashire Gliding Club
- Dover and Folkestone Hang Gliding Club
- First Flight Paragliding School
- Herefordshire Gliding Club
- Isle of Wight Hang Gliding and Paragliding Club
- Kent Gliding Club
- Lasham Gliding Society
- Light Aircraft Association
- Mendip Gliding Club
- Midland Gliding Club
- Norfolk Hang Gliding and Paragliding Club
- Pennine Soaring Club
- Rattlesden Gliding Club

⁴ Six of the general aviation clubs and societies shown were represented by more than one respondent but for the purposes of this document they have only been listed once. It is recognised that the General Aviation clubs and societies listed here are responding on behalf of a large membership base.

- Saltersland
- Sky Surfing Club
- Southdown Gliding Club
- Southern Flyers (Sussex)
- Sportflight Scotland
- Staffordshire Gliding Club
- Stratford on Avon Gliding Club
- The Yorkshire, Derbyshire, Nottinghamshire and Lancashire Regional Soaring Airspace Group (East)
- The Yorkshire, Derbyshire, Nottinghamshire and Lancashire Regional Soaring Airspace Group (West)
- Ulster Hang Gliding and Paragliding Club
- Xclent Paragliding Club
- York Gliding Centre
- Yorkshire Gliding Club
- 499 individuals
- 18 clubs/groups who wished to remain anonymous

Unmanned aerial system (2)

- Two operators of unmanned aerial systems who wished to remain anonymous.

Member of the commercial aviation industry (24)

- BAE Systems Warton
- Birmingham Airport
- Birmingham Airport Air Traffic Limited
- NATS
- Heathrow Airport
- Norwich Airport
- SkyDemon
- Air Navigation Solutions