

Procedure for the CAA to review the classification of airspace

CAP 1991



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This procedure takes effect from 1 December 2020.

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Purpose of this document

CAA procedure for reviewing the classification of airspace

1. This document is about the CAA procedure for reviewing the classification of airspace. The classification of airspace determines the flight rules which apply – how and where aircraft can fly, the equipment that must be carried and procedures that must be followed.
2. The Secretary of State has given the CAA, as the UK's independent aviation regulator, the function to review airspace classifications and to amend them where appropriate.¹ This requires a regulatory procedure. This document explains that procedure.
3. The procedure is effective from 1 December 2020.

How does this procedure relate to the CAP 1616 process for proposed changes in airspace design?

4. The CAA has responsibility for deciding whether to approve any 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 airspace classification forms part of the overall airspace design, so a change in airspace classification could form part of a proposal to change airspace design. Also, a proposed change in airspace classification could of itself have sufficient operational or environmental impacts that it is not suitable for the procedure described in this document. In both cases such proposals follow the process described in our publication CAP 1616.²
5. The CAA's function to review airspace classifications, which is effective 1 December 2020, is legally and functionally separate from our approval of changes in airspace design through the CAP 1616 process. The two processes share some common elements and also have many differences. One fundamental difference is that for the procedure set out in this document the Secretary of State requires **the CAA** to propose a classification change, whereas CAP 1616 airspace change proposals are, with a few exceptions, generally

¹ The CAA has published the Secretary of State's [letter](#) of 30 October 2019. The function to regularly consider whether airspace classification should be reviewed, and to amend it as the CAA considers appropriate in accordance with a procedure, did not previously exist.

² CAP 1616 Airspace change: Guidance on the regulatory process for changing the notified airspace design and planned and permanent redistribution of air traffic, and on providing airspace information.
www.caa.co.uk/cap1616

‘sponsored’ by an **airport or air navigation service provider**, with the CAA acting only as regulator.

6. The CAA has therefore decided to keep these two processes separate.
7. However, at the point where the CAA decides that an amendment to airspace classification is needed, there clearly needs to be consistency with the CAA’s decision-making on proposals to change the airspace design that are following the CAP 1616 process. The CAA Airspace Regulation team that decides on such proposals will, for safety and overall consistency reasons, need to take a holistic view of a change to airspace design or classification, irrespective of whether a change has come from the classification review process or the CAP 1616 process.
8. Appendix A to this document explains what information the CAA Airspace Classification team will collate and publish in the final amendment. It is the template that we use when presenting the amendment to the CAA Airspace Regulation team for a regulatory decision in the same way that Appendix F of CAP 1616 explains what information an airspace change sponsor must provide in its formal proposal. The CAA’s decision criteria in either case will necessarily follow Appendix G of CAP 1616.

Who is this document for?

9. This document is intended to be read by anyone interested in the way airspace is used or accessed, or the impacts of flights using airspace. More information on stakeholder groups can be found on pages 21 to 22.

Structure of this document

10. We have structured the rest of this document as follows:
 - a brief overview of airspace classification
 - the legislative and policy basis for the procedure
 - an overview of the three stages of the procedure
 - the first stage, Consider
 - the second stage, Review
 - the third stage, Amend
 - Appendix A, information that will be presented to the CAA Airspace Regulation team for a regulatory decision
 - Appendix B, a glossary of terms used in this document or related documents.

Overview of airspace classification

What is airspace?

11. States have complete and exclusive sovereignty over the airspace above their territory. States have chosen to commit, by international treaty, to provide air navigation services (which include air traffic control) in that airspace to an internationally recognised standard.
12. For the purposes of providing air traffic services, airspace can be divided into two main categories, controlled and uncontrolled. Aircraft in controlled airspace fly under the positive monitoring and direction of air traffic control to maintain safe distances between them.³ Uncontrolled airspace typically incorporates areas where aircraft are not required to be identified and managed by air traffic services, although pilots may request a service from notified air traffic service providers to support their safe flying.

Airspace classification

13. The Air Navigation Directions have long required the CAA to publish a national policy for the **classification of airspace**. ICAO requires that States determine those portions of airspace where air traffic services will be provided and, where it is so determined, whether air traffic control service or flight information service are provided. In turn, the airspace is designated according to the type of air traffic service provided and in accordance with the ICAO airspace classification system. **Air traffic control** service is provided to all flights within airspace classes A to D and to those flights operating in accordance with the instrument flight rules (IFR) in class E airspace; these are known as 'controlled airspace' classifications. **Flight information service** may be provided to all flights in class G (uncontrolled airspace) and to visual flight rules (VFR) flights in Class E airspace.
14. The classification of the airspace determines the flight rules that apply and the procedures that must be followed. The classification depends upon the types of air traffic involved, the density and complexity of air traffic and the safety hazards posed to passenger-carrying commercial air transport operations. In summary, the ICAO airspace classifications notified within the UK are:

³ In Class E airspace, only flights under Instrument Flight Rules are controlled.

- **class A:** the most restrictive airspace classification, allowing IFR operations only
 - **class C and class D:** airspace allowing for both IFR and VFR operations in a controlled environment
 - **class E:** airspace allowing for both IFR and VFR operations wherein VFR operations are not controlled
 - **class G:** the least restrictive airspace classification, applied to all other airspace.
15. More information on airspace classifications can be found in the CAA policy statement *The Application of ICAO Airspace Classifications in UK Flight Information Regions*.⁴
16. In class G (i.e. uncontrolled) airspace, there are currently no restrictions on which aircraft can enter it or the routes they take. The leisure flying and aerial sports sector within General Aviation tends to operate in class G, alongside a few commercial and business flights. The vast majority of commercial air transport flights operate solely in controlled airspace. The military has significant requirements to use both types of airspace and occasionally also operates within the confines of segregated training or danger areas.

Webpages with factual information

17. If you have questions about the procedure which this document does not answer, there is a dedicated webpage for airspace classification at www.caa.co.uk/airspaceclassification. There are also several pages of information on the CAA website at www.caa.co.uk/airspacechange, including:
- [what is airspace](#) and what is an airspace change?
 - the [airspace change portal](#)⁵
 - the [Airspace Modernisation 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 its air navigation functions and environmental guidance and policy from government which the CAA must take account of.

⁴ <http://publicapps.caa.co.uk/docs/33/20141113PolicyStatementApplicationOfAirspaceClassificationInUKPolicyVersion5.pdf>

⁵ This includes the CAA's policy on moderating material uploaded to the portal and our obligations to disclose information. 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/>

18. If you need more help in understanding any of these issues, then you can email us at airspace.classification@caa.co.uk, but please be aware that we will only answer questions about national policy and process through this address. To raise issues about specific airspace classification changes you should refer to the dedicated webpage for airspace classification at www.caa.co.uk/airspaceclassification.

Legislative and policy basis for the procedure

Overview

19. The procedure for reviewing the classification of airspace must operate within the legal and policy framework set by government.
20. The CAA's statutory duties and functions in respect of airspace regulation are contained in Section 70 of the Transport Act 2000 and The Civil Aviation Authority (Air Navigation) Directions 2017 (as amended), which for convenience we refer to as the 'Air Navigation Directions', or in some cases just 'the Directions'.
21. The procedure for reviewing the classification of airspace is one of these CAA functions. Within the constraints of our statutory duties and government policy, the procedure is designed to be proportionate to its objectives and to be consistent with best-practice regulatory principles. It must also align with the CAA's longer-term strategy, in particular the Airspace Modernisation Strategy, to ensure that airspace planning is consistent with national and international obligations or standards and with new concepts such as the integration of new technologies.
22. To supplement the information below you may wish to refer to our webpage describing the [legal and policy context](#) within which the CAA must work, and to page 13 of [CAP 1616](#) which explains the relationship between CAA guidance and government policy.

Air Navigation Directions

23. Under sections 66 and 68 of the Transport Act 2000, the Secretary of State has given the CAA a number of airspace-related functions. As a result of these Air Navigation Directions⁶, the CAA has developed and published a national policy for the classification of UK airspace, classified UK airspace in accordance with that national policy, and published that classification.

⁶ 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](#). The 2017 Directions form an annex to the [Air Navigation Guidance 2017](#) and the 2018 and 2019 amendments will also be annexed in due course. For ease of reference, the CAA also produces a consolidated version. These can be found at <https://www.caa.co.uk/Commercial-industry/Airspace/Airspace-change/Legislative-framework-to-airspace-change/>.

24. Revised Directions issued in October 2019⁷ also require the CAA – in Direction 3(b) – to:
- regularly **consider** whether airspace classifications should be reviewed
 - carry out a **review** (which includes consultation with airspace users) where we consider a change to classification might be made, and
 - as we consider appropriate, **amend** any classification **in accordance with procedures developed and published by the CAA for making such amendments**.
25. Direction 3(ba) also requires that in developing the national airspace classification policy, classifying UK airspace, or amending the classification of a volume of airspace, the CAA must 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.
- (The CAA understands ‘equitable’ to mean that needs are fairly accounted for, not that each user has the same and equal amount of airspace. The needs of different types of airspace user could vary considerably.)
26. Directions 3(a), 3(b) and 3(ba) are reproduced below. They are effective 1 December 2020.

Extract from The Civil Aviation Authority (Air Navigation) Directions 2017 (as amended)

Directions 3(a),3(b),3(ba)

3. 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

⁷ The Secretary of State’s covering letter said that the revised Directions were designed to strengthen how airspace is managed. The letter also said that the Secretary of State was committed to see that the UK benefits from being the best place in the world to undertake General Aviation-related activities, and that enhancing the UK’s existing airspace arrangements was key to achieving this objective.

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;

27. Unlike the airspace change process where the change sponsor presents a new airspace design to the CAA for approval, the procedure for reviewing the classification of airspace involves **the CAA itself** designing and proposing amendments to airspace. The wording of the Directions is sufficiently flexible for the procedure to accommodate proposals to make a classification more restrictive as well as less restrictive.

Sections 70 and 71 of the Transport Act 2000

28. Under section 70 of the Transport Act 2000, we have a duty to take a number of factors into account when exercising our air navigation functions, including whether to amend an airspace classification. Our duty to maintain a high standard of safety has priority over other factors. Those other factors include national or international obligations, and security, operational and environmental impacts such as aircraft noise and emissions, including taking account of any guidance on environmental objectives given by the Secretary of State.
29. Section 71 of the Transport Act 2000 allows the CAA to request any specific documents or information from an air navigation service provider for any purpose connected with our air navigation functions.

Air Traffic Management and Unmanned Aircraft Bill

30. Should the Air Traffic Management and Unmanned Aircraft Bill become law in the form currently drafted⁸, it will give the Secretary of State (or the CAA if powers are delegated) new powers to compel an air navigation service provider or airport (or other person with functions relating to air navigation):

⁸ The draft Bill can be viewed at <https://services.parliament.uk/bills/2019-21/airtrafficmanagementandunmannedaircraft.html>

- to prepare an airspace change proposal that will assist in the delivery of the CAA's airspace strategy
- to take steps towards the preparation of such an airspace change proposal
- to co-operate for the purpose of assisting another air navigation service provider, airport (or other person with functions relating to air navigation) to do the above

including following CAA procedures and having regard to its guidance and doing specified things by specified dates. In this context, 'airspace change proposal' includes a proposal to change the classification of a volume of airspace under this procedure.

Secretary of State for Defence

31. Direction 12 adds a provision in cases "where it appears to the CAA that there is a need to increase the volume, or alter the classification, of UK airspace, but to do so might, in the opinion of the CAA or the MoD [Ministry of Defence], have an adverse effect on the ability of the armed forces of the Crown to maintain their operational capability". The Directions require us to seek the approval of the Secretary of State for Defence before proceeding with any such change to UK airspace.
32. Where the Secretary of State for Defence is content with the proposed change, the CAA must ensure that such further consultation on the proposal is undertaken as required under the Directions. Where the Secretary of State for Defence is not content with the proposed change, the CAA may only approve the proposed change in accordance with directions given by the Secretary of State under section 68(3) of the Act.
33. We may therefore need to consult the Ministry of Defence on a proposal to change airspace classification, and seek its approval where appropriate, before proceeding with any consultation.

Environmental guidance from the Secretary of State

34. Section 70 requires the CAA to take account of the interests of any person other than an airspace user (which would include those on the ground) and of any guidance on environmental objectives given to the CAA by the Secretary of State when carrying out its air navigation functions as set out in the Air Navigation Directions. For our function relating to a change in airspace design (one which goes through the CAP 1616 process), this guidance is the Air Navigation Guidance 2017, last issued in October 2017. However, in respect of airspace classification, the guidance was amended by the Secretary of State's letter of 31 October 2019 accompanying the Directions.

35. In that letter, the Secretary of State stated that the CAA should consider the environmental consequences of a proposal we make for amending the classification of airspace, but he also specifically *disapplied* the existing Air Navigation Guidance. Because of the section 70 requirement, we must therefore make our own assessment of the potential environmental consequences. We have concluded that the principles we would use would be the same as the Air Navigation Guidance, but without any of the obligations on process that the guidance contains.⁹

36. Below is an extract from the Secretary of State's letter:

“Supplementary guidance to the Civil Aviation Authority (CAA) on environmental objectives when carrying out its air navigation functions

In accordance with section 70(2)(d) of the Transport Act 2000, the CAA should note that:

i. the environmental objectives set out in the Air Navigation Guidance 2014 and 2017, as well as the rest of that Guidance, are not to apply to:

- decisions whether to approve proposals for permanent changes to airspace design which seek to implement GNSS approaches without approach control; or
- decisions to amend the classification of any airspace in accordance with the amended Directions 2017 new direction 3(b) (airspace reclassification);

ii. this exemption from the Guidance is to apply with immediate effect and until further notice;

iii. although exempted, we expect sponsors of exempted proposals, including the CAA, to consider the potential environmental consequences of the proposals, and to engage with relevant communities as the CAA considers appropriate;

iv. the department will keep this exemption under review and will notify you of any change in this policy; and

v. the exemption will be incorporated into the Air Navigation Guidance when a suitable opportunity arises.”

⁹ Our approach to the assessment of environmental impacts is on pages 49 to 50.

Call-in by the Secretary of State

37. There is no ability for the Secretary of State to ‘call-in’ a CAA proposal under this procedure.
38. The position is different for a proposed change in airspace design made under the CAP 1616 process. In that case, if the proposal meets certain criteria, the Secretary of State may decide to call-in the proposal and to make the related decision, instead of the CAA doing so. One of these criteria is where a proposal could lead to any volume of airspace classified as class G being reclassified as class A, C, D or E. This is set out in Direction 6(5)(d) of the Air Navigation Directions.
39. However, this only applies to the CAA’s decision-making functions subject to the call-in requirements (Directions 4(1), 5(1), 5A(1)). **There is no provision in the Directions for the Secretary of State to call-in a proposal by the CAA to amend airspace classification under the procedure that is the subject of this document.**

Alignment with the Airspace Modernisation Strategy

40. One of the CAA’s functions is to have a strategy and plan for airspace. The CAA reviewed and rearticulated its airspace strategy in response to a government policy change that redefined our role when the Government’s Air Navigation Directions were updated and republished in October 2017. In those Directions the Secretary of State gave the CAA a number of new roles, including developing a long-term strategy and plan for modernising UK airspace, with the objective to deliver quicker, quieter and cleaner journeys and more capacity for the benefit of those who use and are affected by UK airspace. Modernisation is critical to ensure that this invisible piece of the UK’s national infrastructure is fit for purpose for the future. Prior to the Covid-19 pandemic, the UK’s skies were accommodating increasing numbers of commercial flights, military activities and an active General Aviation sector, as well as new types of user such as remotely piloted aircraft systems.¹⁰
41. The CAA published the resulting Airspace Modernisation Strategy as CAP 1711¹¹ in December 2018, setting it in the context of the latest government policy, including on environmental impacts, demand from airspace users and technological developments (see overleaf). You can read the latest news about the strategy on our [website](#).

¹⁰ Unmanned Aircraft may be referred to as drones, remotely piloted aircraft systems (RPAS), unmanned aerial vehicles (UAV), model aircraft or radio-controlled aircraft. For more information see <https://www.caa.co.uk/Consumers/Unmanned-aircraft/Our-role/An-introduction-to-unmanned-aircraft-systems/>

¹¹ www.caa.co.uk/cap1711

42. The procedure for reviewing the classification of airspace may be used as one of the tools for delivering one of the 15 initiatives of the Airspace Modernisation Strategy. **The procedure for reviewing the classification of airspace must therefore align with the Airspace Modernisation Strategy and dovetail with the other initiatives, to achieve the important, holistic approach to airspace modernisation.**
43. The Review stage of this procedure will be used to develop a list of airspace volumes where a case could be made for a proposed amendment to the airspace classification. The classification procedure could aid improvement in the UK's compliance with ICAO requirements or to facilitate the introduction of new air traffic management concepts.
44. The list of airspace volumes where a case could be made for a proposed amendment to the classification will be formally adopted into the Airspace Modernisation Strategy.

Summary of legal and policy framework

45. In summary, the CAA must:
- regularly consider whether to review the classification of airspace
 - consult airspace users as part of any review
 - where we consider an amendment to airspace classification might be made, amend it in accordance with a procedure that we must develop and publish
 - in developing that procedure and our usage policy, 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
 - ensure that the outcome is consistent with the factors set out in section 70 of the Transport Act 2000, including complying with any environmental guidance given to us by the Secretary of State
 - consult the Ministry of Defence before making any amendment to airspace classification
 - ensure that the procedure is consistent with the Airspace Modernisation Strategy and best practice regulatory principles.
46. Our overriding objective will always be to maintain a high standard of safety.

Overview of the three-stage procedure for reviewing the classification of airspace

The three-stage procedure

47. The wording of the Directions gives us three distinct stages for this procedure: to **Consider** regularly whether we carry out a review of airspace classification; to carry out a **Review** (including consulting airspace users) where we consider a change might be made; and to **Amend** the classification as we consider appropriate.
48. We summarise each of those stages in the table below. Each stage is described in more detail on pages 25 to 61.

Stage (starting point)	Purpose	Outcome
Consider	The CAA regularly (normally every two years) commits to carrying out a review of airspace classifications, unless this would be unreasonable. We make a yes/no decision at an internal meeting of senior airspace colleagues. If we decide not to do a review, we will defer it for a maximum of one year. Any decision to defer would be based on whether the CAA can reasonably anticipate having sufficient staff resource (including the necessary skillset) to carry out a review, taking into account: (a) whether there are national or international regulatory obligations to meet within a certain timeframe (b) whether there are airspace safety, efficiency, environmental or access benefits that a review might help to define and deliver (c) any outstanding priorities from previous reviews (d) Department for Transport advice or directions prioritising our airspace functions.	The CAA confirms that it is carrying out a review and when. We may limit the broad scope of the review if we choose. We notify aviation stakeholders of our decision and reasoning. This stage does not involve consultation or analysis of airspace volumes.
Review (The CAA has decided to carry out a review of airspace classification)	We use appropriate intelligence, including continuous monitoring of airspace safety, access or utilisation issues, to draw up a plan that lists airspace volumes where a case could be made for a proposed amendment to the classification, and a proposed schedule for when we will address them. We consult organisations in the Airspace Modernisation Strategy governance structure that represent airspace users, or are a conduit to them, for feedback on the plan including any strategic advice or other information they would like us to consider. (Periodically we may widen this to a public consultation.) When we receive suggestions, we apply filters to remove any change which would have a significant operational or environmental impact that makes it unsuitable for this procedure. We may not pursue an amendment to airspace that is the subject of an ongoing or recent airspace design change. We engage with relevant airspace controlling authorities to help refine the requirements for the next (Amend) stage. We publish a refined plan after consultation and adopt it as part of our Airspace Modernisation Strategy.	The CAA publishes a plan for airspace volumes where we could make a case for a proposed amendment to the classification (or for an alternative airspace management solution if this is a more appropriate or proportionate response).
Amend (The CAA has published a plan for airspace volumes where we could make a case for a proposed amendment to the classification)	For each airspace volume identified, the CAA develops further a formal proposal for amending the classification, with vital input from the designated airspace controlling authority. The proposal must satisfy the requirements of the Air Navigation Directions and the factors in section 70 of the Transport Act 2000. This includes the controlling authority developing the operational procedures and safety case with CAA assistance, but ultimately the controlling authority owning the safety component of the proposal. The CAA assesses any potential environmental impacts and adds this to the proposal. The CAA engages relevant stakeholders about the proposal and takes their feedback into account in finalising the formal proposal that amends the classification. When signed off by the manager of the CAA Airspace Classification team, this proposal is then passed to the CAA Airspace Regulation team for submission to the decision-making process.	After review by the CAA Airspace Regulation team, the CAA publishes its decision on each formal proposal for amending the classification. The airspace controlling authority implements any amended classification. After one year the CAA reviews the effectiveness of the change and whether further action is needed.

The CAA designs and proposes the amendment

49. The Air Navigation Directions give the CAA a different role from the existing CAP 1616 airspace change process for proposed changes in airspace design.¹² The procedure for reviewing the classification of airspace is functionally separate from the CAP 1616 process, which has given us some flexibility to keep it proportionate to the intended objective and tailor it accordingly. There is one important fundamental difference, which is that the Directions require the CAA to propose the classification change, whereas CAP 1616 airspace change proposals are, with a few exceptions, generally ‘sponsored’ by an airport or air navigation service provider, with the CAA acting only as regulator.¹³ This means that for a classification change under this procedure, **the CAA is involved in the design and proposal for the new airspace, with essential input from the designated controlling authority** of the volume of airspace (i.e. the air navigation service provider). To accomplish this, these proposals are handled by a specialist CAA Airspace Classification team dedicated to this procedure that includes the skills to undertake airspace design.
50. There are some aspects of a proposed change in classification that, even with those skills, we cannot produce alone. We are reliant on the airspace controlling authority, as only they will have the local operational knowledge needed. **The controlling authority will need to own the safety of the airspace, and therefore the operational procedures and safety case for the amended design**, even if we assist them as they prepare it.
51. In the unlikely event that the controlling authority’s input is not forthcoming, the Air Traffic Management and Unmanned Aircraft Bill would give the Secretary of State (or the CAA if powers are delegated) new powers to compel that input where it would assist in the delivery of the CAA’s airspace strategy (see legal framework above).
52. The CAA’s Airspace Regulation decision-making process assesses whether any amendment in classification complies with all relevant implementation requirements for airspace design and does not conflict with the airspace design overall. Although that formal decision comes at the end of the procedure, and is taken independently, there is still formal discussion between the CAA teams during the design process.

¹² www.caa.co.uk/cap1616

¹³ Although the procedure is quite separate from the CAP 1616 airspace change process, any change in airspace design that is proposed by a sponsor under the CAP 1616 process could well include a change in airspace classification. This is unaffected by the separate procedure for reviewing classification. Also, as explained at the Review stage of this document, a proposal for a change in classification could of itself be deemed unsuitable for this procedure because it has potentially significant operational or environmental impacts that must be thoroughly assessed through the more detailed CAP 1616 process.

53. In applying the procedure, the CAA's aim is to remain proportionate to its objective and consistent with best-practice regulatory principles. We must also align with the CAA's Airspace Modernisation Strategy (CAP 1711 published in December 2018, or its successors) that seeks to modernise UK airspace through new operations, new airspace design and new technologies (see pages 15 to 16).
54. When considering proposals for a change in airspace design, the CAA already 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 the UK's national or international regulatory obligations. The procedure for reviewing the classification of airspace gives us the opportunity, where it is appropriate and safe to do so, to make a change to a less restrictive airspace classification or to reduce the volume of airspace that is controlled. The procedure also accommodates proposals to make the classification more restrictive, where necessary.
55. The CAA may use this procedure to enable UK compliance with ICAO requirements on airspace classification, and to facilitate the introduction of new air traffic management concepts to support, for example, the integration of drones and other emerging technologies as part of airspace modernisation.¹⁴
56. In applying this procedure, our overriding objective will always be to maintain a high standard of safety. **Expectations for what the procedure can reasonably deliver should always be seen in this context.**

Timeline for a specific proposal

57. The Directions do not oblige the CAA to adhere to any particular timeline. Because this is a new function for the CAA, run by a new Airspace Classification team doing airspace design work that until now has been done by the sponsor, not the CAA, we can for now only give a general guide to the likely timeline for a typical proposal, until the new procedure has been fully applied. The proposals will, in any case, be likely to vary considerably in their complexity. Each will require extensive analysis of data, followed by stakeholder consultation, more analysis, design work, cooperation with the airspace controlling authority, further consultation, review and implementation arrangements.
58. As a general guide, we can set some bounds for a specific proposal: in CAP 1616 we give a typical timeline for a Level 1 airspace change of 110 weeks, which, because of the potential impacts of the change, is likely to involve a more complex process than a classification change under this procedure. We can be

¹⁴ The procedure allows us to review whether the classification remains appropriate to the demands upon that volume of airspace – which could include future use by drones – and to propose a different classification if necessary, or the use of airspace in a flexible way. The procedure would not determine the way airspace is used or the classification policy.

reasonably confident therefore that a classification change under this procedure would take a shorter time. We do however have consultation or engagement exercises at both the Review and Amend stages. Should we need to allow eight or 12 weeks for those, plus time for preparation and analysis, this suggests a lower bound of around 50 weeks minimum, without taking into account other elements of the procedure.

59. Of course, the resources that we can devote to any one proposal will in part depend on how many changes are in the plan that we publish at the Review stage. This could easily affect individual timelines. Within the plan we expect to prioritise these proposals based on their individual merits (see page 43).

Collecting and analysing data to create an evidence base

60. Prior to the introduction of this procedure, the CAA had not routinely collected data on airspace utilisation. To obtain a solid evidence base, we are beginning to collect data (and devising mechanisms for how to do so in the future) that will allow us to carry out objective analysis of airspace utilisation by all airspace users. We have to work within our resource constraints, but we expect as a minimum to source data for a given volume of airspace that we have identified as of potential interest or which is the subject of a stakeholder suggestion where we need to verify what we are being told.
61. This means:
- identifying what data we need (sufficient to meet our statutory obligations in support of this procedure, but not so extensive or granular that its collection and analysis would be unmanageable or disproportionate)
 - identifying who owns that data
 - if not owned by the CAA, establishing whether we can obtain that data, on what timescales and at what cost, and
 - analysing that data in a way that is meaningful and that will give us appropriate outputs.
62. We set out the data we have identified so far in the description of the Review stage on pages 30 to 33.

Relevant stakeholders

63. **Secretary of State:** The Secretary of State's objective for this procedure is for the CAA to regularly consider whether the classification of designated volumes of UK airspace requires review. The procedure allows the CAA, where it is appropriate and safe to do so, to use a less restrictive airspace classification or to reduce the volume of airspace that is controlled. In doing so, we will satisfy the obligation in new Direction 3(ba) to "seek to ensure [...] that the needs of all

airspace users are reflected on an equitable basis” and potentially provide benefits for airspace users generally, including members of the General Aviation community, by allowing better access to it. In the longer term, as explained above, the procedure will also give us another tool to use in seeking to modernise airspace so as to maintain a high standard of safety and accommodate new users and new technology.

64. **Designated airspace controlling authority** of a volume of airspace: The main interested parties in the design and classification of airspace are, at higher altitudes, NERL (NATS En Route plc, the subsidiary of NATS which is air traffic control provider for upper airspace); at lower levels, airport operators and localised air traffic services providers; and the Ministry of Defence which has an interest in upper and lower airspace for diverse purposes.
65. **Airspace users** including airlines and other commercial operators, the Ministry of Defence, and the General Aviation community, which encompasses a wide range of aviation activity from microlights, gliders and balloons to corporate business jets. In the future, and depending on how airspace classes evolve, drone operators and other types of airspace user may also have an interest in the procedure. Controlled airspace can reduce the freedom to manoeuvre for certain users. At lower altitudes in particular, there is more of a challenge in balancing the differing (and often conflicting) requirements of a more diverse range of users without compromising safety. Depending on the airspace classification, leisure flyers, for example, may have to fly around controlled airspace, or seek permission to cross it. If a review suggests a volume of controlled airspace may be underutilised or larger than necessary, or its classification is no longer justified, then the CAA can consider its amendment.
66. **Communities:** those affected by aviation noise or other environmental impacts, their representatives, councils and other elected representatives, and organisations with an interest in aviation’s environmental impact. We do not anticipate a significant environmental impact from a change made under this procedure, as it will not be used for any change that affects published or predictable aircraft tracks inside controlled airspace, such as changes to departure and arrival routes at aerodromes.
67. **Users of air transport services**, i.e. passengers and shippers: we do not anticipate that the procedure will have any impact on this group.

Transparency

68. As with the airspace change process, a prime objective of this procedure is that it is as transparent as possible throughout. Those with an interest in a change in airspace classification should feel confident that their voice has a formal place in the procedure. Openness also allows the CAA and the airspace controlling authority to see more clearly what is expected from them.