

Outcome of the engagement on proposed criteria for assessing and accepting the airspace change masterplan

CAP 2157



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Summary of changes to the acceptance criteria originally proposed

Subject	Change
Scope	The acceptance criteria have been amended to reflect that ACOG has now been commissioned to produce a masterplan covering the UK and not just southern England, thus encompassing the FASI-South and FASI-North programmes (FASI meaning Future Airspace Strategy Implementation) redesigning the existing airspace structure.
Clarity of document	For greater clarity we have published the criteria for accepting the masterplan as CAP 2156a Airspace change masterplan – CAA acceptance criteria and the assessment framework as CAP 2156b Airspace change masterplan – assessment framework . By assessment framework we mean the legal and policy considerations, and the process that the co-sponsors will follow (1) to assess ACOG's progress with developing the airspace change masterplan iterations and (2) to confirm that these are delivering what the co-sponsors commissioned. We have introduced diagrams to illustrate the masterplan development process more succinctly, and also how it relates to the CAP 1616 process that sponsors of the airspace change proposals making up the masterplan must also follow. We have published a short guide, CAP 2156c Airspace change masterplan – future opportunities to express views , explaining the opportunities that stakeholders have for engagement with ACOG about the masterplan and sponsors about airspace change proposals.
Plain English	We have used plain English as far as we can for the acceptance criteria and explained any unavoidable technical terms. We have specified that ACOG's engagement material must include a simple, clear and non-technical version in plain English, to include cumulative impacts, and a clear explanation of the expected benefits and programme timeline.
Transparency	We are considering with ACOG and the Department for Transport how best to publish all the information associated with the development of the masterplan, ideally as a 'one-stop shop', probably as a CAA webpage.
Iteration 3	As a result of this engagement exercise, we have decided to make changes to the stages at which the masterplan will present proposed trade-off solutions. The proposal in CAP 1887 was that ACOG will include in Iteration 3 actual proposed trade-off solutions to the conflicts and interdependencies identified in Iteration 2. We have now decided that

	Iteration 3 will not propose one design option in preference to another. The masterplan will now only propose trade-off solutions in subsequent iteration(s). We have done this to ensure that the final iteration(s) of the masterplan is/are the product of analysis carried out by individual airspace change sponsors. That analysis will be based on the output of the consultation stage (Stage 3) of the sponsors' individual constituent CAP 1616 process airspace change proposals. These Stage 3 consultations will be an important opportunity for stakeholders to influence decisions on proposed trade-off solutions that may affect them (see below). ACOG will include in Iteration 3 a description of how specific design trade-offs between interdependent airspace change proposals could be resolved conceptually. Iteration 3 will be based on the outputs of Stage 2 and 3 work carried out by sponsors during the CAP 1616 process.
Final iteration	Iteration 4 (and potentially subsequent iterations) will show the complete, detailed plan of airspace changes setting out how ACOG, working with airspace change sponsors, envisages that any conflicts between interdependent airspace change proposals are resolved, i.e. include proposed trade-off decisions.
Engagement	ACOG will consider the views of individual stakeholders at the strategic, masterplan level through a public engagement exercise on a draft of Iteration 3. This includes views on the way the masterplan proposes conceptual solutions to potential conflicts between interdependent airspace change proposals, and views on any potential gaps or improvements in the masterplan. Through this engagement ACOG will make stakeholders aware of the upcoming consultations on each constituent airspace change proposal, how they are linked together, and how stakeholders can input into proposed trade-off decisions that may affect them.
Flexibility	We have introduced greater flexibility into the acceptance criteria: - when submitting Iteration 2 for acceptance, ACOG is required to include a plan for the content of later iterations; we will keep the acceptance criteria in CAP 2156a for Iteration 3 and beyond under review and update them as circumstances require - in development of a particular iteration, ACOG may choose to make a case to the CAA and Department for Transport as co-sponsors during the ongoing assessment process that a particular element in the criteria should be moved between iterations, or omitted should it no longer be relevant or proportionate to the required outcome

	• we recognise that there may be more iterations than the four described in our engagement document CAP 1887 • in order to progress the modernisation programme most efficiently, it may be beneficial for ACOG to divide the masterplan into separate 'clusters' with different timelines, each with a set of interdependent airspace change proposals; the co-sponsors will consider ACOG's advice on this and will accept these clusters in any accepted version of Iteration 3 • we have made clear that we will need to update the acceptance criteria over the lifetime of the masterplan.
Masterplan development	We have made clearer that the acceptance criteria focus on outcomes for the masterplan, rather than prescribing a specific process ACOG must follow. ACOG will be required to explain milestones, assumptions and the process it is using to develop the masterplan iterations, including how it arrives at proposed solutions for resolving conflicts. The co-sponsors will assess whether ACOG is following this approach and delivering the required outcomes while remaining consistent with the legal and policy framework.
Environmental assessments	We have added to the criteria that a strategic environmental assessment and Habitats Regulation assessment will need to be developed for the masterplan. These assessments are a fundamental part of, and therefore must inform, ACOG's development of the masterplan. The CAA is legally responsible for ensuring that these assessments are carried out in respect of the masterplan. We will, in due course, set out what ACOG's role is in these assessments, and where in the process this occurs. The acceptance process will ensure that these assessments have been carried out and acted upon appropriately.
General Aviation	The acceptance criteria already required the masterplan to include information about the cumulative impacts of different design choices. We have added to the criteria a specific requirement for ACOG to include in each iteration of the masterplan, a general assessment of the potential positive benefits or negative impacts on airspace usability, including on the General Aviation sector.
CAA procedure to review airspace classification	We have recognised in the masterplan assessment framework (CAP 2156b) that there could be an interaction between the CAA's new procedure to review airspace classification and the masterplan where the volume of airspace concerned is the subject of an airspace change proposal which forms part of the masterplan. The CAA would formally notify the sponsor concerned of the evidence derived as part of the classification review and also inform ACOG as masterplan coordinator.

Chapter 1

Engagement exercise

Purpose of this document

- 1.1 In February 2020, the CAA launched an engagement exercise seeking views on CAP 1887, *Proposed Criteria for Assessing and Accepting the Airspace Change Masterplan*¹, in particular:
- our proposed approach for assessing and accepting the masterplan into the CAA Airspace Modernisation Strategy, including ensuring it delivers government policy
 - our proposed criteria and evidence to inform acceptance of the masterplan, including whether we were asking the right questions of ACOG, the Airspace Change Organising Group², as it develops iterations of the masterplan.
- 1.2 This document sets out the outcome. It has a summary of the changes we have made from CAP 1887, and two chapters:
- Chapter 1 summarises the engagement exercise and who responded
 - Chapter 2 looks in detail at what those responses told us, including:
 - the key themes we identified from multiple-choice and free-text responses to the four questions we asked, and the methodology we used
 - selected direct quotes from responses, where we have permission to publish
 - our conclusions from this analysis
 - the outcome of how we have taken this feedback into account in the acceptance criteria, which we have published as three documents:
CAP 2156a, *Airspace change masterplan – CAA acceptance criteria*
CAP 2156b, *Airspace change masterplan – assessment framework*
CAP 2156c, *Airspace change masterplan – future opportunities to express views*.³

¹ See www.caa.co.uk/cap1887 and <https://consultations.caa.co.uk/policy-development/airspace-change-masterplan-criteria/>.

² www.acog.aero

³ www.caa.co.uk/cap2156a, www.caa.co.uk/cap2156b and www.caa.co.uk/cap2156c.

Background

- 1.3 In December 2018, the UK Civil Aviation Authority (CAA) published an Airspace Modernisation Strategy to initiate a crucial programme of airspace modernisation to deliver a once-in-a-generation upgrade to a key piece of national infrastructure. The strategy is in response to a direction to the CAA from the Secretary of State to “prepare and maintain a co-ordinated strategy and plan for the use of UK airspace up to 2040, including modernisation”.⁴
- 1.4 The CAA and Department for Transport, as co-sponsors of airspace modernisation in the UK, have commissioned ACOG⁵ to create an airspace change masterplan. Initially the commission was in respect of airspace in Southern England, but this has now been extended to cover all of the UK, thus encompassing the ‘FASI-South’ and ‘FASI-North’ programmes (FASI meaning Future Airspace Strategy Implementation) redesigning the existing airspace structure. The masterplan is a single coordinated implementation plan showing which airspace changes are necessary and when, to support delivery of the objectives of the Airspace Modernisation Strategy. The masterplan ensures that all of the individual airspace changes work together to deliver a modernised airspace system.
- 1.5 Responsibility for the redesign of the airspace and routes in these initiatives is split mainly between airports (for routes close to airports) and NERL (NATS En Route plc, for upper airspace routes connecting airports). These are complex airspace design programmes that require coordination between these different ‘sponsors’ of airspace design changes. Interdependencies and potential conflicts mean such changes must be considered and coordinated as a package. UK airspace is some of the most complex in the world. The FASI-South airspace change programme is particularly complex because of the number of changes necessary to achieve modernisation over Southern England.
- 1.6 The masterplan is therefore a crucial element in airspace modernisation. It will set out where airspace changes would provide particular benefits while also considering interdependencies and potential conflicts and trade-offs. It does not set out the precise design of individual airspace changes; that will be determined through the CAA’s airspace change process set out in CAP 1616.

⁴ 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. The CAA has published a [consolidated version](#) of the Directions.

⁵ The commission was originally made of NERL, NATS En-Route plc, which manages upper airspace and its design. NERL subsequently set up ACOG as an impartial body to coordinate between airports and the NERL team designing the upper airspace system. The commissioning letters are reproduced as an appendix to CAP 2156a *Airspace change masterplan – CAA acceptance criteria* www.caa.co.uk/cap2156a.

- 1.7 In a letter to the Chair of the CAA dated 4 November 2019⁶, the Secretary of State stated that ACOG should have the following strategic aims, and that these should be reflected in the Terms of Reference of ACOG and its Steering Committee:
- create airspace capacity to support the growth of aviation
 - reduce controlled airspace
 - release lower airspace
 - reduce delay for passengers to ensure that they get to their destination on time
 - reduce noise and CO₂ emissions.
- 1.8 With agreement from the CAA and Department for Transport as co-sponsors, ACOG has adopted an iterative approach to the development of the masterplan, which recognises that different information and levels of detail will be available at different points as the constituent airspace changes which together make up the plan, and therefore the plan itself, develop.
- 1.9 **The CAA's engagement exercise set out draft criteria for the CAA's decision whether to accept the masterplan into the Airspace Modernisation Strategy, based on assessment by the CAA and Department for Transport of information provided by ACOG to determine whether the commission for the masterplan is being met and the Government's policy objectives are being delivered.** That acceptance makes the masterplan, together with CAP 1616, the legal basis against which the CAA makes decisions on individual airspace change proposals.
- 1.10 The engagement exercise published in CAP 1887 was to give us the opportunity to strengthen our proposed criteria and take feedback on whether we were asking the right questions of ACOG as it developed iterations of the masterplan. The exercise was originally planned to be relatively short, for just four weeks from 27 February 2020 until 27 March 2020. This was to give us enough time to consider responses, publish how we had taken responses into account, and publish the criteria for accepting the masterplan, all by summer 2020, after which time the criteria would have become operational for the purposes of assessing and accepting future iterations of the masterplan.
- 1.11 Because of the disruption caused by the Covid-19 pandemic, the CAA decided to give stakeholders more time to provide feedback. We eventually extended the deadline for comments by a further three months to 26 June 2020, and the four-week engagement exercise became 17 weeks, attracting considerable interest from nearly 100 respondents, many giving us very detailed comments. Although we said that we might seek further views if it became apparent through analysing

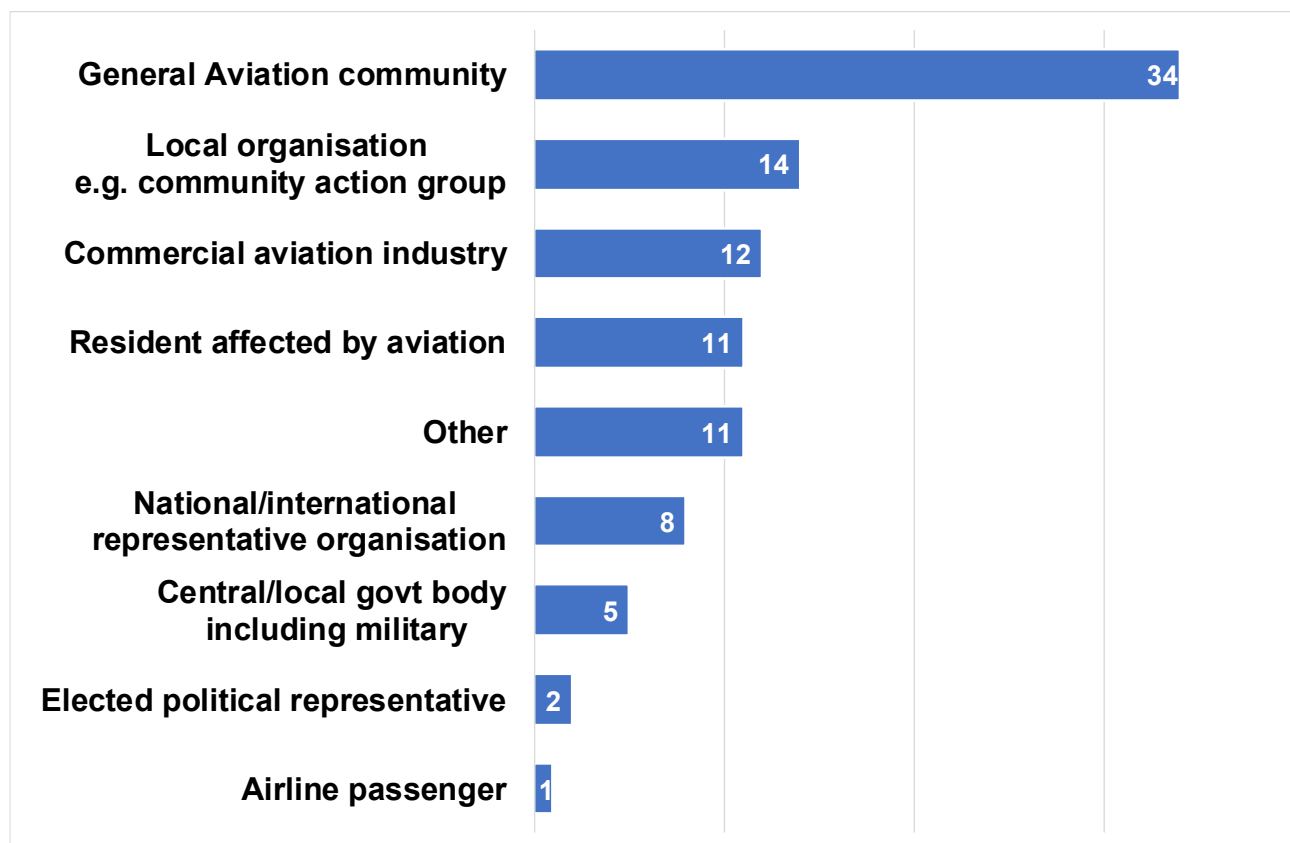
⁶ www.caa.co.uk/cap1889

the engagement that we had not received a broad spread of views, our analysis did not show this to be necessary.

Who responded to this engagement exercise

- 1.12 We had 98 responses in total, after removing duplications (four respondents submitted two responses). We asked respondents to categorise themselves into one of nine categories (Figure 1.1).

Figure 1.1: Responses to the engagement exercise by category of respondent



- 1.13 Of the 98 respondents:
- 34 responses were from members of the General Aviation community
 - 14 responses were from local organisations such as community action groups
 - 12 responses were from the commercial aviation industry of which six were from airports or air navigation service providers, and two were from airlines
 - 11 responses were from residents affected by aviation
 - 11 responses were in the 'other' category, including four from organisations or individuals whose specific focus is on aviation noise, two

from organisations representing pilots and five from a variety of other interests

- eight responses were from a national or international representative organisation e.g. trade association
- five responses were from a central or local government body including military
- two responses were from an elected political representative e.g. councillor or MP
- one response was from an airline passenger.

1.14 Although 16 responses categorised themselves as 'other', we decided it was more appropriate to recategorise five of these:

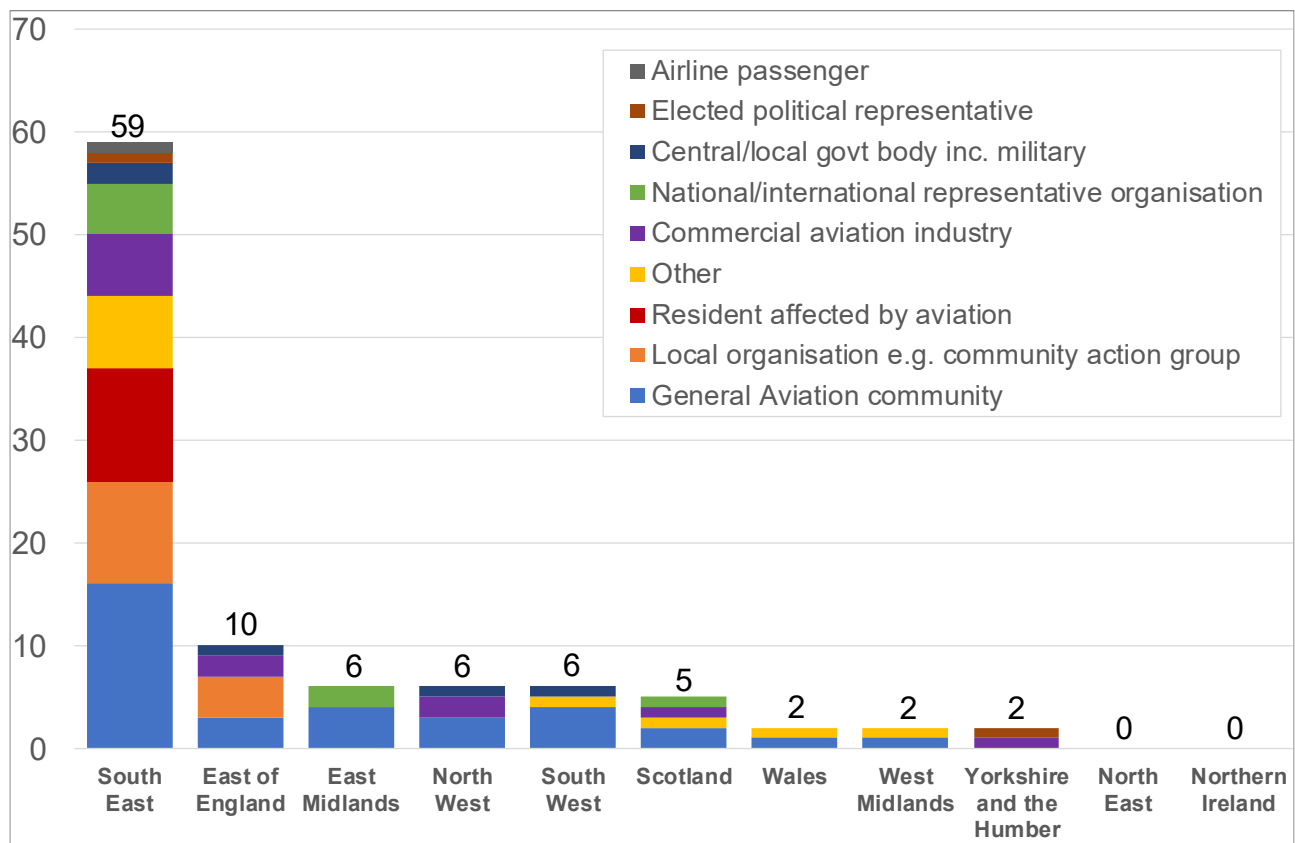
- three responses on behalf of airports or air navigation service providers – recategorised as commercial aviation industry
- one response from a parish council – recategorised as local government
- one response from a trade association – recategorised as national representative organisations e.g. trade associations (accepting that it was an *international* trade association).

1.15 A full list of respondents appears at the end of this chapter.

Geographic spread of responses

1.16 Of the 98 responses, 59 identified themselves as resident or based in the South East, 10 as resident or based in the East of England, six in each of the South West, North West and East Midlands, five in Scotland and two in each of Wales, West Midlands and Yorkshire and the Humber (Figure 1.2).

Figure 1.2: Responses to the engagement exercise by geographic region



Publicising the engagement exercise

- 1.17 To encourage a wide engagement, on the day of publication the CAA invited views from approximately 730 individuals and organisations through a direct email and a further 13,000 through the CAA's Skywise platform. Two comments extensions were notified in the same way, serving as a further reminder.

List of respondents by category

Member of the General Aviation community (34)

- Bliss Aviation
- Cirrus Advanced Flight Training
- London Transport Flying Club
- Rattlesden Gliding Club
- Warbird Experiences Ltd
- two General Aviation businesses that preferred not to be identified
- 27 individuals.

Local organisation e.g. community action group (14)

- Communities Against Gatwick Noise Emissions
- Englefield Green Action Group
- Friends of Richmond Park

- Hanwell Community Forum
- Heathrow Association for the Control of Aircraft Noise
- Luton and District Association for the Control of Aircraft Noise
- Plane Hell Action SE
- Richmond Heathrow Campaign
- St. Albans Quieter Skies
- Stop Stansted Expansion
- Teddington Action Group
- three local organisations that preferred not to be identified.

Member of the commercial aviation industry (12)

- Heathrow Airport Ltd
- London Luton Airport Operations Ltd
- UPS
- three individuals
- six members of the commercial aviation industry that preferred not to be identified.

Resident affected by aviation (11)

- 11 individuals.

Other (11)

- British Airline Pilots' Association
- Edinburgh Airport Noise Advisory Board
- Heathrow Strategic Planning Group
- Independent Commission on Civil Aviation Noise
- Local Authorities' Aircraft Noise Council
- The Honourable Company of Air Pilots
- The Royal Parks
- Vanguardia Ltd
- three individuals who preferred not to be identified.

National or international representative organisation e.g. trade association (8)

- Airport Operators Association
- Aviation Communities Forum
- British Gliding Association
- British Microlight Aircraft Association
- General Aviation Alliance
- International Air Transport Association
- Light Aircraft Association
- one organisation that preferred not to be identified.

Central or local government body including military (5)

- Hertfordshire County Council
- Prestbury Parish Council
- Surrey County Council
- Wroughton Parish Council
- one central or local government body that preferred not to be identified.

Elected political representative e.g. councillor or MP (2)

- one Member of Parliament
- one parish councillor.

Airline passenger (1)

- one individual.

Chapter 2

Analysis of the responses

Overview

- 2.1 In this chapter we consider in detail what the responses told us. You can read individual responses, where we had permission to publish them, on our consultation website.⁷
- 2.2 This chapter includes:
- a reminder of the four questions we asked in our engagement document (CAP 1887)
 - our analysis of the answers to the two questions that had a multiple-choice element (questions 2 and 3)
 - the methodology we used to identify key themes from free-text responses to all four questions we asked
 - the 19 key themes we identified and how we grouped them under 10 headings
 - direct quotes from responses, where we have permission to publish
 - our conclusions from this analysis
 - how we have taken this feedback into account in the acceptance criteria, which we have published as CAP 2156a, *Airspace change masterplan – CAA acceptance criteria*.⁸

Engagement questions

- 2.3 Our engagement document CAP 1887 asked four questions, two of which were in a multiple-choice format with space for supporting free-text comments giving views or supporting rationale, and two of which were free text only. For convenience we have labelled these as questions 1 to 4 for the purpose of our analysis in this chapter. The questions were:

⁷ <https://consultations.caa.co.uk/policy-development/airspace-change-masterplan-criteria/>

⁸ www.caa.co.uk/cap2156a

- **Question 1:** CAP 1887 details the proposed criteria to be used to inform whether to accept the Airspace Change Masterplan, which is being created by the Airspace Change Organising Group (ACOG), an impartial team in NERL. **Do you have any general comments you would like to share on the proposed criteria for assessing and accepting the Airspace Change Masterplan?** [\[free text\]](#)

- **Question 2:** Are the proposed criteria detailed in CAP 1887 the right criteria to enable acceptance? [\[multiple choice\]](#)

☐ about right	☐ minor modifications needed
☐ significant modifications needed	☐ don't know

Please explain your answer and provide any other general comments. [\[free text\]](#)

- **Question 3:** Chapter 3 of CAP 1887 details the policy considerations that are relevant to the Airspace Change Masterplan. **Are there examples of where further policy may be required to guide trade-off decisions?** [\[multiple choice\]](#)

☐ yes	☐ no	☐ don't know
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If yes, please be specific, preferably with a local example. [\[free text\]](#)

- **Question 4:** Chapter 4 of CAP 1887 details the engagement expectations for the Airspace Change Organising Group (ACOG) to undertake. **Do you have any comments on the engagement we are asking ACOG to undertake?** [\[free text\]](#)

Quantitative analysis of multiple-choice questions

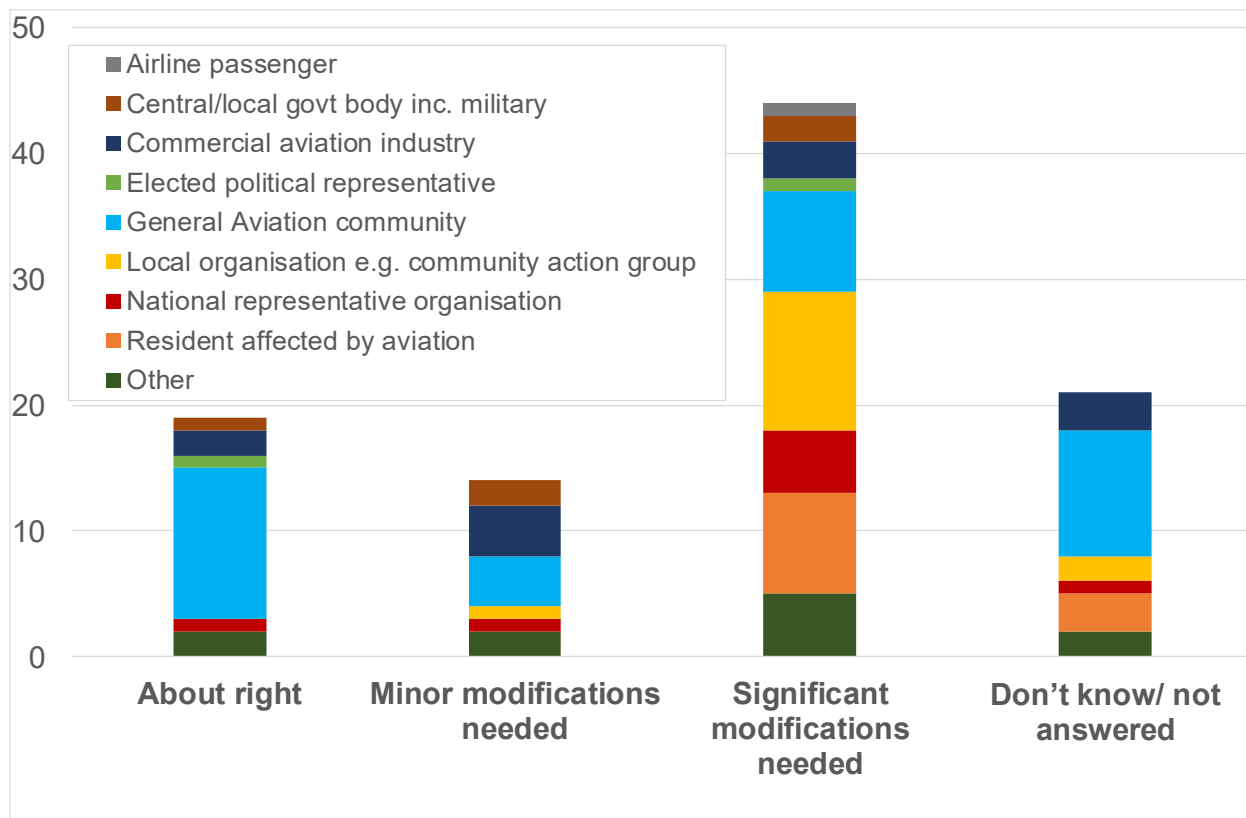
Responses submitted by email

- 2.4 Of the 98 responses we received, three were submitted by email rather than through our online consultation portal. These three email submissions were not arranged in our question format and so gave no answer to individual questions. Therefore they are shown as 'not answered' in our analysis of answers to the two multiple-choice questions, and we consider the points they raised in our qualitative analysis of free-text responses.

Question 2: Are the proposed criteria detailed in CAP 1887 the right criteria to enable acceptance?

2.5 Of the 98 responses, 44 thought that significant modifications to the acceptance criteria were needed. Excluding 21 'don't know/not answered' responses, this equates to more than half the responses expressing a view. There were 33 responses saying that the criteria were about right (19) or that only minor modifications were needed (14). (See Figure 2.1 below.)

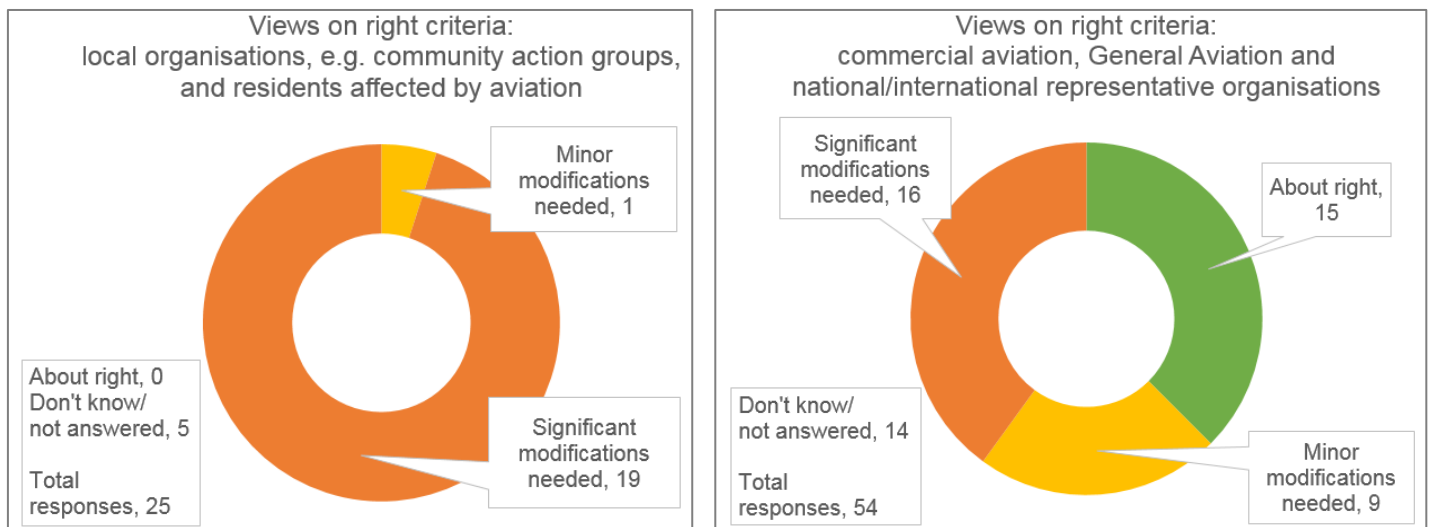
Figure 2.1 Responses to question 2: are these the right criteria to enable acceptance?



2.6 A more detailed look at each category of respondent (see Figure 2.2 below) shows that this outcome is more pronounced if we focus only on responses from local organisations such as community action groups and from residents affected by aviation. Excluding five 'don't know/not answered' responses, 19 of 20 responses (95%) from local organisations and residents said that significant modifications to the acceptance criteria were needed, with one response saying minor modifications were needed (none said the criteria were 'about right').

2.7 In contrast, aviation stakeholders were more divided in their views, if we consider responses from commercial aviation industry, General Aviation and international or national organisations (of which six of the eight respondents were either commercial industry or General Aviation organisations). Excluding 14 'don't know/not answered' responses, there were 40 responses from these three categories, of which 24 (60%) said that the criteria were about right or needed only minor modifications, and 16 said that significant modifications were needed.

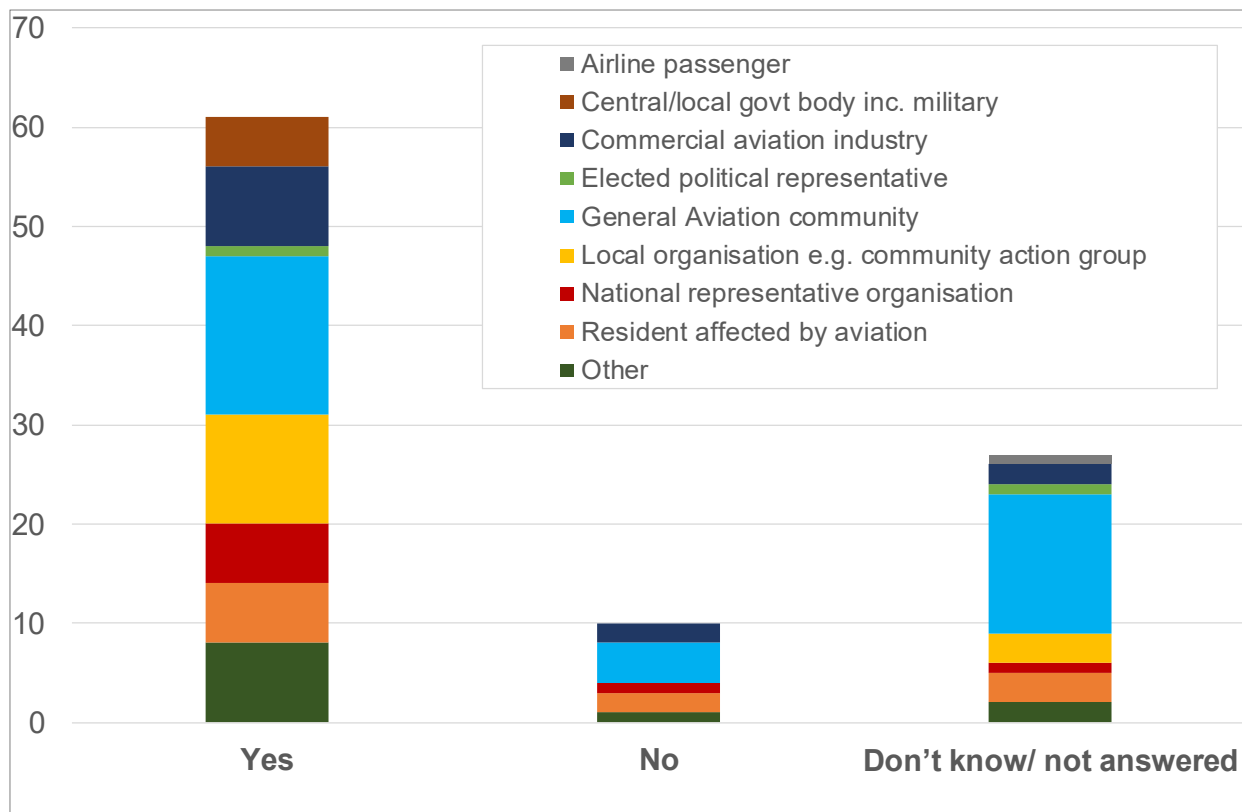
Figure 2.2 Responses to question 2 by selected respondent group



Question 3: Are there examples of where further policy may be required to guide trade-off decisions?

- 2.8 Of the 98 responses, 61 thought that there were examples where further policy may be required to guide trade-off decisions and 10 thought there were not. (Two of the 61 'yes' responses did not, however, give any examples in the free-text box as we asked.) If we exclude 'don't know/not answered' responses, 86% of responses said further policy may be required (see Figure 2.3).

Figure 2.3 Responses to question 3: are there examples of where further policy may be required to guide trade-off decisions?



Conclusion from the answers to multiple-choice questions 2 and 3

The answers to question 2 suggest that many respondents thought the criteria for acceptance needed changes. Although the engagement exercise was not a referendum, it seems clear that this view was held across all stakeholder categories.

Similarly the answers to question 3 indicate that across all stakeholder categories there was a view that we need to expand or explain better the policy guiding trade-off decisions.

In each case we have looked at the free-text responses to understand the views of respondents and whether we should in the light of those make appropriate changes to the acceptance criteria and supporting information.

Methodology for analysing free-text responses

2.9 We used a basic qualitative research method to analyse the free-text responses. To identify key themes, four members of CAA staff each read around 15 responses in full, listing the topics, concerns and comments raised within them. These lists were then discussed and consolidated, creating a list of themes identified by unique tags. Four members of CAA staff between them then read all the responses and, using the software contained in the consultation hub, allocated 'tags' to the free-text responses to each of the four questions in each response. This method ensured that:

- every individual response was read from start to finish by a member of CAA staff
- the themes we discuss in this chapter were generated by the respondents in their free text responses – they were not pre-identified by the CAA but are the key points raised directly by the respondents themselves, and
- key themes emerging in each response were noted so that, where possible, they were analysed quantitatively (i.e. so that we know how many respondents, and of which stakeholder group, raised a particular topic or concern).

2.10 If a respondent raised the same theme in several questions, each instance was counted, but each theme was only counted once per question, per response. For example, if a respondent mentioned 'safety' once in response to a question, that counts as one instance; if they mentioned it three times in response to that question, it was still counted as one instance; if they mentioned it in response to three separate questions that was counted as three instances.

2.11 Stakeholder groups were not evenly represented in terms of numbers, so where there are differences of opinion we have avoided focusing on the overall percentage of respondents favouring or criticising a particular aspect of the

proposed process. Instead we consider how individual stakeholder groups have responded and whether they are split as a group or in disagreement with other groups.

Matters out of scope

- 2.12 A significant number of responses included comments that were out of scope of the engagement exercise. Our engagement document CAP 1887 (paragraphs 18 and 19) set out clearly what we were seeking views on and what we were not:

“What we are seeking views on

18. We are seeking your views on:

- the proposed approach for assessing and accepting the Masterplan into the CAA Strategy as outlined in Chapters 2 to 5 of this document
- commentary on the proposed criteria and evidence to inform acceptance of the Masterplan.

“What we are not seeking views on

19. We are not seeking the following:

- views on technical or operational concepts about how aircraft will fly or other aspects of airspace design. Whether potential designs are technically feasible will be a regulatory decision to be made in accordance with the CAP 1616 process.
- contributions of potential design options for individual airspace changes to be included within the Masterplan. There will be an opportunity to contribute these as the Masterplan and the individual airspace changes in it develop.
- comments on Government policy, as this derives from section 70 of the Transport Act 2000 and includes the primary duty to maintain a high standard of safety and otherwise to ensure the most efficient use of airspace, satisfy the requirements of operators and owners of all cases of aircraft and take into account any guidance on environmental objectives given to the CAA by the Secretary of State.”

- 2.13 Many respondents gave us lengthy responses running over multiple pages on a whole range of issues that concerned them. Some responses even acknowledged that they knew that elements were out of scope of the engagement exercise.

- 2.14 We recognise that it is important to respondents that the CAA considers their responses, which we have done. To show this we summarise in this chapter what was said. Some of those views concern aviation policy matters that the Department for Transport, not the CAA, is responsible for developing. It is

possible that some comments were out of scope because respondents said they found parts of the engagement document hard to understand (see Heading 1 below). We have taken note of this and clarified much of the text of the acceptance criteria.

Themes from analysis of the free-text responses

- 2.15 From our analysis of free-text responses we identified 19 themes across the four questions. There were 591 instances (defined as explained above) in total where those themes were raised.
- 2.16 We then arranged these 19 themes under 10 headings as follows:
- **Heading 1: CAP 1887 or acceptance criteria not easy to understand** (22 instances)
 - **Heading 2: Proposed approach for accepting the masterplan**
 - supportive comments (18 instances)
 - negative comments (37 instances)
 - **Heading 3: Negative comments about the CAA, government policy or ACOG's impartiality**
 - negative comments about the role or independence of CAA as airspace regulator (31 instances)
 - negative comments about government policy (37 instances)
 - ACOG and/or steering group not impartial (52 instances)
 - **Heading 4: Masterplan acceptance criteria and airspace modernisation in the light of changed circumstances**
 - masterplan acceptance criteria are based on insufficient or invalid information (ANPS-related or Covid-related) (48 instances)
 - airspace modernisation including the masterplan and related processes should continue or be kept flexible (9 instances)
 - **Heading 5: Design standards that inform the masterplan** (9 instances)
 - **Heading 6: Envisaged engagement on masterplan inadequate or too much**
 - engagement on masterplan inadequate (59 instances)
 - engagement on masterplan too much (8 instances)
 - **Heading 7: Trade-offs – clarity and stakeholder input**
 - need for clarity (46 instances)
 - stakeholder input and mediation in trade-off decisions (35 instances)
 - individual trade-off decisions should be assessed through the CAP 1616 airspace change process rather than the masterplan (3 instances)
 - **Heading 8: Reducing environmental impacts should take precedence over growth**
 - noise impacts (57 instances)
 - emissions impacts (32 instances)