

THE REVISED AIRSPACE CHANGE PROCESS

Draft CAP 725 Part A

**CAA GUIDANCE ON THE APPLICATION OF
THE AIRSPACE CHANGE PROCESS**

Contents

Section	
1	Forward
2	Purpose
3	General
Stage 1	Framework Briefing
Stage 2	Proposal Development
Stage 3	Preparing for Consultation
Stage 4	Consultation
Stage 5	Formal Proposal Submission and Regulatory Approval
Stage 6	Implementation
Stage 7	Operational Review
Annex A	Abbreviations and Acronyms
Annex B	Reference Documents
Annex C	Operational/Environmental Report
Annex D	Methods of Consultation
Annex E	Consultation Report

CAA GUIDANCE ON THE APPLICATION OF THE AIRSPACE CHANGE PROCESS

1 Foreword

1.1 In exercising its air navigation functions, the CAA must give priority to maintaining a high standard of safety in the provision of air traffic services in accordance with Section 70(1) of the Transport Act 2000. The CAA must exercise its air navigation functions in the manner it thinks best to:

- secure the most efficient use of airspace;
- satisfy the requirements of all airspace users;
- take account of the interests of any person in relation to the use of any particular airspace or the use of airspace generally;

whilst taking account of;

- the Government's policy on sustainable development;
- the Government's policy on reducing, controlling and mitigating the impacts of civil aviation on the environment;
- the need to reduce, control and mitigate as far as possible the environmental impacts of civil aircraft operators; and in particular the annoyance and disturbance caused to the general public arising from aircraft noise and vibration, and emissions from aircraft engines.

1.2 A change to the use or classification of airspace in the UK can take many forms and may be simple and straightforward to implement with little noticeable operational or environmental impact. Conversely, a change may be complex and involve significant alterations to existing airspace arrangements that impact upon the various airspace user groups and the general public. Regardless of their scale, changes to airspace arrangements (which includes procedures for the use of controlled airspace in addition to its design) should be made after consultation, only where it is clear that an overall environmental benefit will accrue or where airspace management considerations and the overriding need for safety allow for no practical alternative.

1.3 A list of Abbreviations and Acronyms used throughout this document is at Annex A

2 Purpose

2.1 The purpose of this document is to provide detailed guidance and better understanding of the processes by which changes to the dimensions, classification or use of UK airspace are implemented. Although this document draws from several reference documents (see Annex B) it should be strictly viewed as **guidance material only** – it is essential that Change Sponsors refer to these source documents and not rely on CAP 725 (Parts A and B) as their sole source of information, direction and guidance. This document provides a framework for the stages and activities ordinarily involved; from the conception of the need for an airspace change through to regulatory approval and, finally, if appropriate implementation. It also provides specific guidance on conducting the consultation exercise and sets out the requirement for the completion of consultation, operational and environmental reports.

- 2.2 However, it is impossible to provide all of the answers a Change Sponsor may need as many of the issues will invariably be local in their nature and Change Sponsors may be faced with situations specific to their own needs without precedent elsewhere. Consequently, in addition to this guidance, Change Sponsors should maintain close contact with the assigned member of staff at the Directorate of Airspace Policy (DAP).

3 General

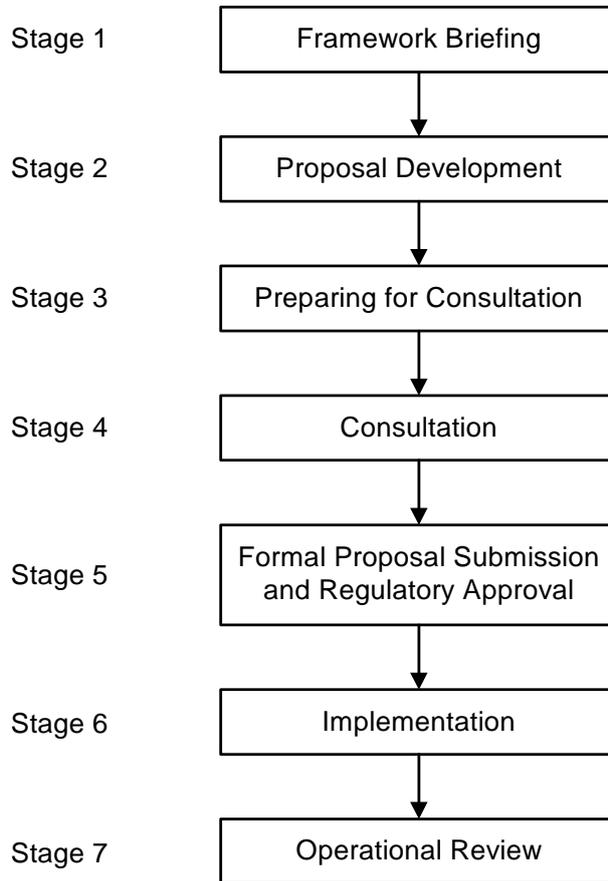
3.1 What Constitutes an Airspace Change?

- 3.1.1 An airspace change could comprise, but is not limited to, one or more of the following characteristics:
- a) Changes to International Civil Aviation Organisation (ICAO) airspace classification;
 - b) Changes to the lateral or vertical dimensions of existing Controlled Airspace (CAS);
 - c) The introduction of, or changes to Standard Instrument Departure routes (SIDs), Standard Arrival Routes (STARs) or Noise Preferential Routes (NPRs);
 - d) Introduction of, or changes to Holding Patterns;
 - e) Changes to Air Traffic Control Centre (ACC) arrangements resulting in changes to the route structure or aircraft flight profiles;
 - f) Delegation of airspace or ATS to an adjacent State;
 - g) Changes to the lateral or vertical dimensions of Danger Areas, Restricted or Prohibited Airspace, or their use;
 - h) Changes to the use of airspace (including significant changes to aircraft type, patterns and procedures);
 - i) Changes to the hours of operation of existing airspace structures.
- 3.1.2 As an Aerodrome Traffic Zone (ATZ) assumes the classification of the airspace in which it is established, the Airspace Change Process is not used for their establishment. Instead, any request for the establishment of an ATZ will follow the procedure described at Annex I of the Airspace Charter.
- 3.1.3 Changes to SIDs or STARs having no additional environmental impact over that currently experienced will follow an abbreviated version of the Airspace Change Process. Procedures for the establishment of Visual Reference Points (VRPs) are currently described in Aeronautical Information Circular (AIC) 18/2004 (Yellow 129) dated 1 April 2004
- 3.1.4 Changes to ACC sector boundaries that have no additional environmental impact over that currently experienced are not normally subject to the Airspace Change Process, unless one of the characteristics listed above occurs as a direct consequence of the revised arrangements. Change Sponsors should seek advice from the Directorate at an early stage of their planning.

3.2 Who Can Initiate an Airspace Change?

3.2.1 Principally, a Change Sponsor will be one of the following: an aerodrome operator, an Air Navigation Service Provider (ANSP), a combination of aerodrome operator and ANSP, or the Regulator (CAA).

3.3 Overview of the Airspace Change Process



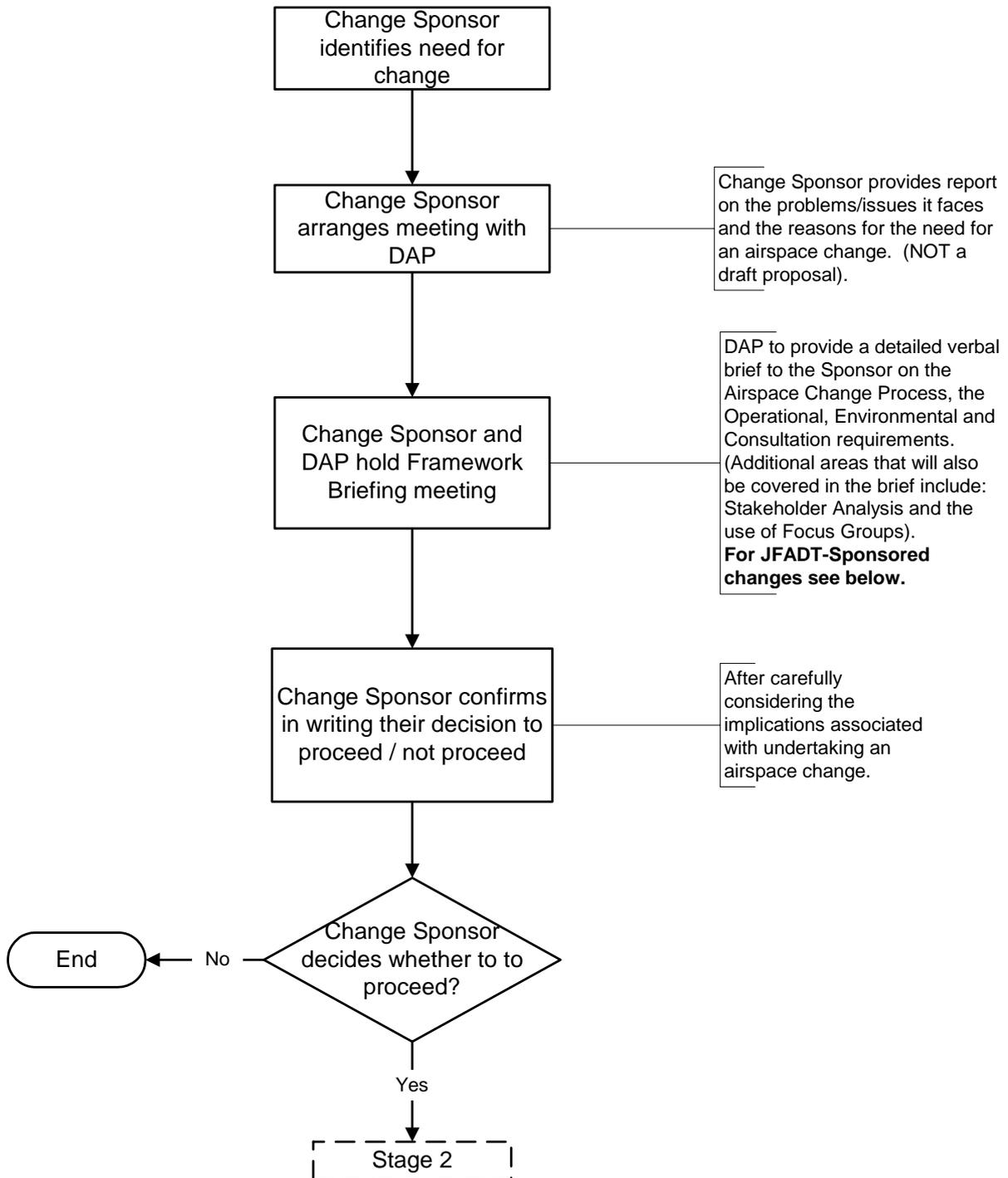
3.3.1 Airspace Change Proposals will be handled according to one of two airspace change processes: this standard published process as set out in this document that the vast majority of airspace changes must follow and secondly, a ‘Fast Track’ process reserved for safety critical changes or changes that have limited impact. It is likely however, that the CAA will be the only sponsor of a change which will utilise the ‘Fast Track’ process. In contemplating any airspace change, it is essential that consideration be given to the implications that a move from the *status quo* will have on the operations of the Change Sponsor, those of other airspace users, aerodromes operators, ANSPs and the general public.

3.3.2 The completed proposal will need to convince the Director, Airspace Policy, of the need for, and merits of the proposed airspace change in terms of safety, efficiency and in mitigating the environmental impact to the greatest extent possible *[including the other statutory requirements covered earlier in the Forward]*. Change Sponsors should note from the outset that it is vital that they give careful and equal consideration to the implications of the proposed change on their own operations, those of other airspace users and the general public living beneath existing controlled airspace. Thus, Change Sponsors should be aware when developing

their initial design proposals that these may need to be adapted to reflect and balance the competing requirements of the stakeholders. During Stage 1 – Framework Briefing, the Directorate will brief potential Change Sponsors on the viability of their embryonic proposal, give guidance on the consultation requirements and provide advice about identifying stakeholder organisations. The success of a change proposal will depend on the quality of the operational and environmental analysis, the thoroughness of the consultation and, subsequently, its formal submission to the Directorate as a fully developed proposal.

- 3.3.3 A timescale for completion of the full process cannot be pre-determined. The amount of resource that a Change Sponsor would need to devote to proposal development, consultation, adaptation and documentation could be considerable and would invariably affect the length of the Process, as would the complexity and sensitivity of a proposal. For example, the nature of the consultation might require that an iterative process of ‘consult-refine-consult’ is necessary and this would need to be considered when looking ahead to implementation timescales.
- 3.3.4 It is likely that Change Sponsors will receive opposition to their proposals from one or more stakeholder groups. Objections may come at any time during the process (or even later) from airspace users, adjacent ANSPs, local government, the public or environmental interest groups. In the majority of cases it will be possible, and in some cases necessary, to modify change proposals to accommodate such opposition. Change Sponsors must remain alert to the possibility of an opposition group leading campaign against their change proposal, which may result in considerable delays to the completion of the Sponsor Consultation and Proposal Development stages of the Process. Change Sponsors may at least need to reconsider planned change implementation dates in such circumstances; at worst, they may have to withdraw the proposal altogether. In such instances, the Directorate will make the final decision that will be based upon an assessment of a full objective submission from all parties concerned.

STAGE 1 – FRAMEWORK BRIEFING



- 1 On identifying a need for changing the airspace arrangements, the Change Sponsor must arrange a meeting with the Directorate.
- 2 The Change Sponsor should come prepared to discuss the problems/issues that are currently being experienced and why/how it believes that changing the airspace arrangements will address these difficulties. Change Sponsors should not develop a draft proposal at this stage.

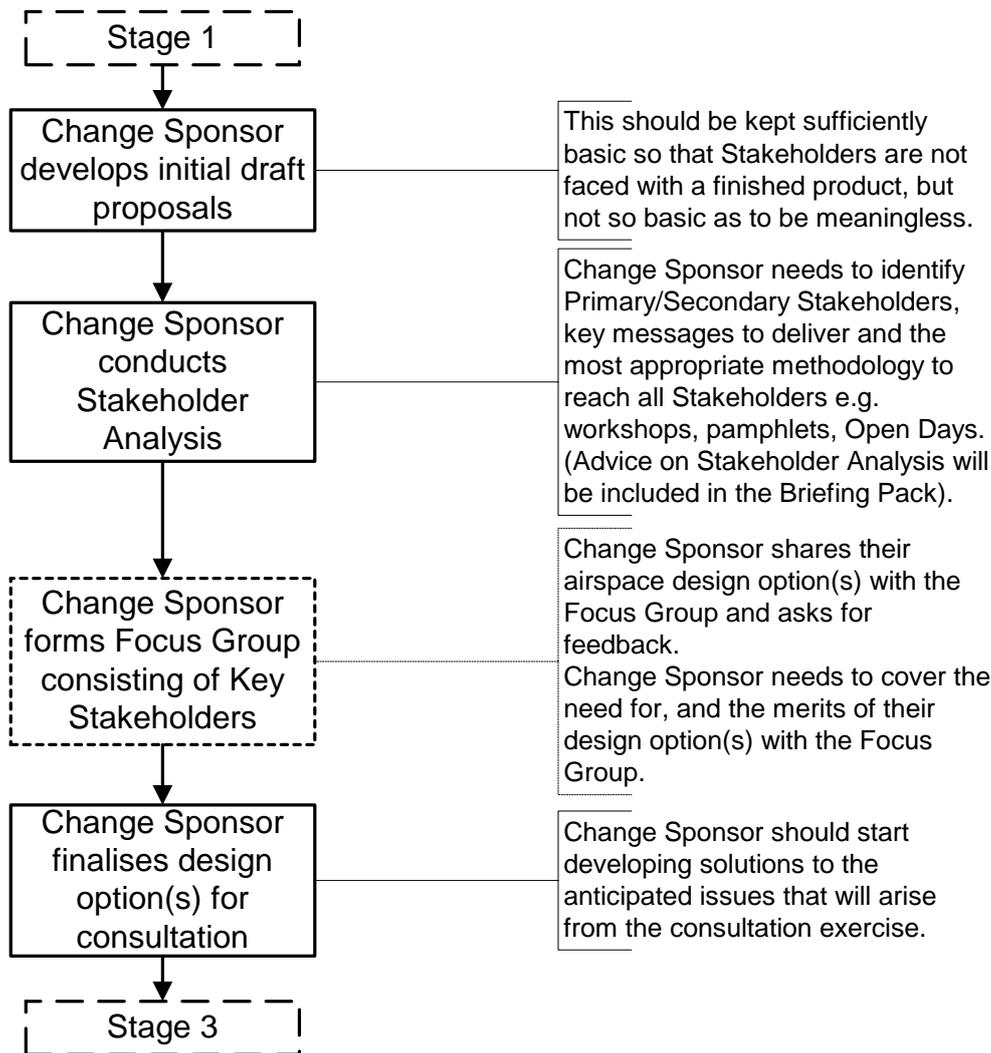
- 3 During the discussions, Directorate staff will listen to the merits of the Change Sponsor's line of reasoning and provide the appropriate advice and guidance as to the best way forward. As part of the meeting, Directorate staff will give a detailed verbal brief on the Process itself, and the Operational, Environmental and Consultation Requirements (including how to complete a Stakeholder Analysis at Stage 2 - Proposal Development). A 'point of contact' within the Directorate will also be established for all the Change Sponsor's future enquiries. The briefing material will be provided as hard copies at the meeting.
- 4 Following the briefing, Change Sponsors must confirm, in writing, their intention to proceed with the development of a Proposal.

5 JFADT-Sponsored Changes Only

- 5.1 The process differs slightly in the case of airspace changes proposed by the Joint Future Airspace Design Team (JFADT). The JFADT is a joint MoD/NATS team that proposes changes to airspace to promote safe operations that provide increased capacity and efficiency. These changes are likely to be on a significant scale, and generally involve long-term planning, simulation and may involve international co-ordination.
- 5.2 In advance of the meeting, the JFADT is to submit an Outline Airspace Change Proposal to the Directorate. The Outline Proposal must include:
- a) Justification for the proposed change;
 - b) An initial indication of costs and benefits in respect of the sponsor and all affected parties;
 - c) An initial assessment of the impact of the proposed change on all airspace users;
 - d) An initial assessment of the impact of the proposed change on the airspace arrangements in adjoining States (where appropriate);
 - e) An initial assessment of the environmental implications of the proposed change;
 - f) Identification of any connectivity to European Airspace Programmes, including relevant timescales;
 - g) An implementation plan that includes both a target introduction date and a contingency introduction date.
- 5.3 The Directorate will assess the Outline Airspace Change Proposal and decide to either reject it or accept it 'in principle' as being justified. This additional element is necessary in order to take account of the large capital investment required to prepare for and implement a major change affecting large parts of the UK's or neighbouring States' airspace.
- 5.4 Change Sponsors will be informed of the Directorate's decision within one calendar month of receipt of the outline proposal having been received. This is subject to the Directorate being in receipt of all necessary information as detailed above. Additional information may be requested from the Change Sponsor to assist in the assessment of the outline proposal.

- 5.5 Should the outline proposal be rejected, the Change Sponsor will be provided with a full explanation of the reasons. In this event, Directorate staff will be available to discuss the proposal with the Change Sponsor with a view to their submitting a revised Outline Proposal. **A decision to accept 'in principle' the need for a change does not in any way commit the Directorate to acceptance of any specific detail of how the change is to be implemented, as this is likely to develop as part of the consultation process described in later chapters of this document.**

STAGE 2 – PROPOSAL DEVELOPMENT



1 Having identified a need for change and having attended the Framework Briefing, the Change Sponsor begins to develop and analyse airspace design options that would satisfy their needs. This will form the bulk of the ACP and can be resource-intensive.

2 Development of Design Options

2.1 The environmental impact of airspace design options must be considered from the outset and will vary from one ACP to another. Guidance on completing a full environmental assessment of an ACP is contained at 'Draft CAP 725 Part B'; it describes the methodologies and metrics that would enable the DAP to assess the environmental impact of proposals in accordance with the CAA's statutory duties. However, at this stage, where Change Sponsors are required to develop initial draft proposals, it would be sufficient to consider environmental matters in broad terms to begin with, but nevertheless bear in mind that a detailed environmental assessment may be required when finalising the design option(s) for consultation. Therefore, the Change Sponsor should discuss their general intentions for environmental assessment with the DAP case officer at the beginning of the Proposal

Development stage and, if necessary, with the DAP Environmental Research and Consultancy Department staff who will provide independent expert advice.

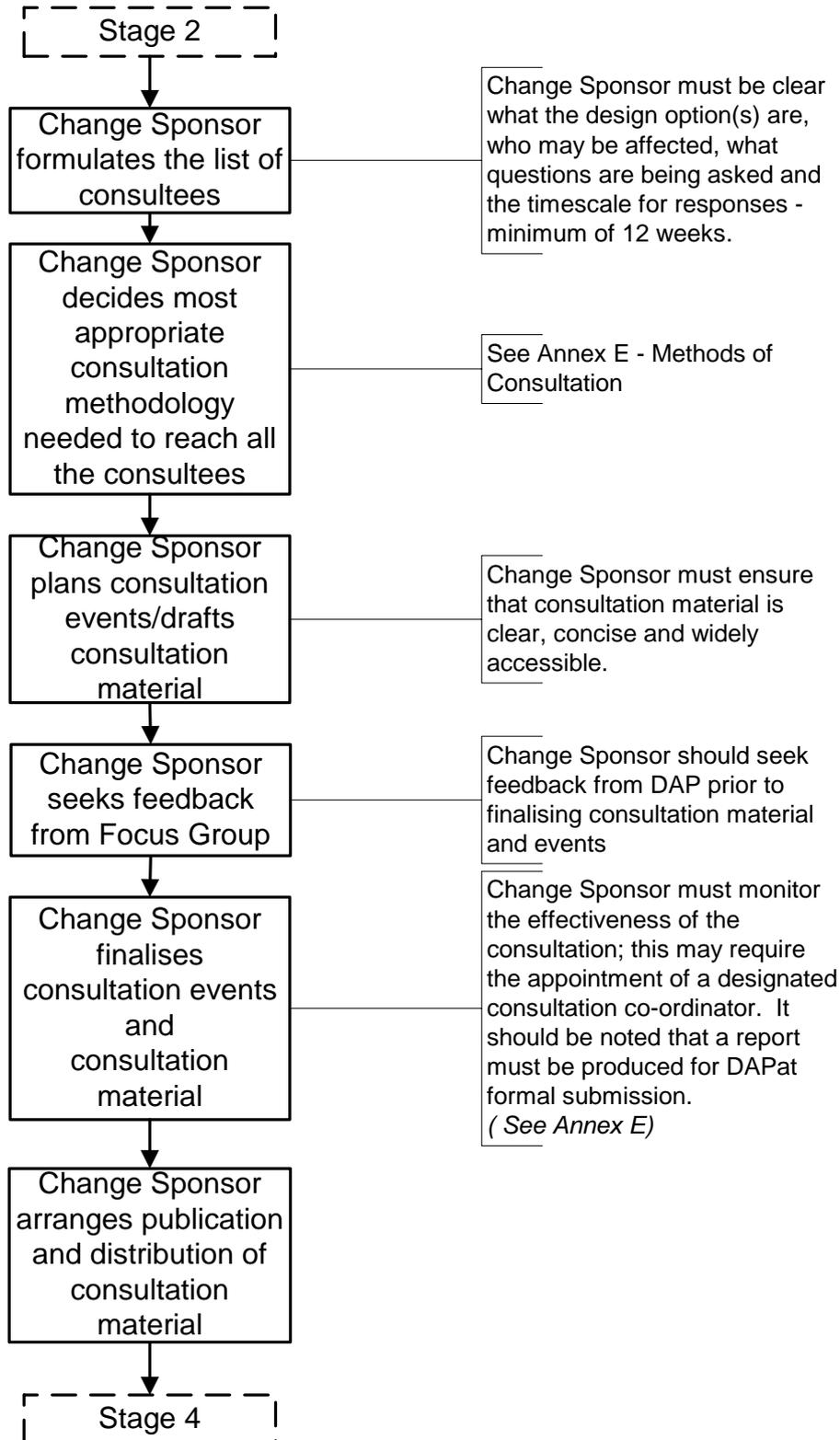
- 2.2 Development of design options should also proceed under the headings detailed in: Airspace Change Proposal – Operational/Environmental Report at Annex D, and which form the basic structure on which to build a formal proposal.

3 Stakeholder Analysis

- 3.1 Once there is sufficient clarity in the airspace design options, the Change Sponsor can begin to identify all the different parties affected by these design options by conducting a 'stakeholder analysis'. It is important to think broadly about the affected parties beyond direct airspace users, or organisations that have a known interest. For example, the proposal might impact on other sectors of the population outside the immediate environs of the airport. All County, District Borough and Unitary authorities whose area of responsibility might be overflowed, especially if it is the first time this will occur, must be considered as 'stakeholders'. In addition, those authorities (including Parish/Community councils) not falling into the above category but which have previously shown an interest – both positive and negative – in the Change Sponsor's business activities must be considered. 'The Local Government Companion', published by The Stationery Office, provides a definitive guide to the functions and people of local government.
- 3.2 If the stakeholder analysis tool is utilised correctly, it will greatly assist with producing a complete List of Consultees to be used during the critical Consultation Stage. In addition, the tool will assist with identifying 'key messages' to inform consultees and the most appropriate methodology to reach the consultees. Guidance on how to conduct a stakeholder analysis will be covered as part of the Framework Briefing.
- 3.3 Once the Change Sponsor has identified all affected parties, it should categorise them into the primary and secondary groupings. It is recommended that some, or all of those parties in the primary grouping be invited to form a Focus Group to assist with the further development of its draft proposal; i.e. the development of the design options; identification and potential resolution of the issues surrounding the design options; formulation of the consultation material and consultation lists. It is recommended that aerodromes with an airport consultative committee should utilise this forum as its Focus Group. Areas where the Focus Group can contribute significantly are:
- the identification of stakeholders/consultees.
 - the identification of the most appropriate methods of reaching the stakeholders/consultees.
 - the identification of what will be considered important by stakeholders/consultees.
 - assistance with the formulation of the consultation material to ensure that it will be clear and understood by the stakeholders/consultees – this will help get any messages across better.
- 3.4 The Change Sponsor should seek to modify the proposals in the light of the Focus Group's feedback. Further guidance on the role of the Focus Group will be covered as part of the Framework Briefing.

- 3.5 If the Change Sponsor chooses not to form a Focus Group, it should continue with the formulation of the design options in preparation for the consultation stage.

STAGE 3 – PREPARING FOR CONSULTATION

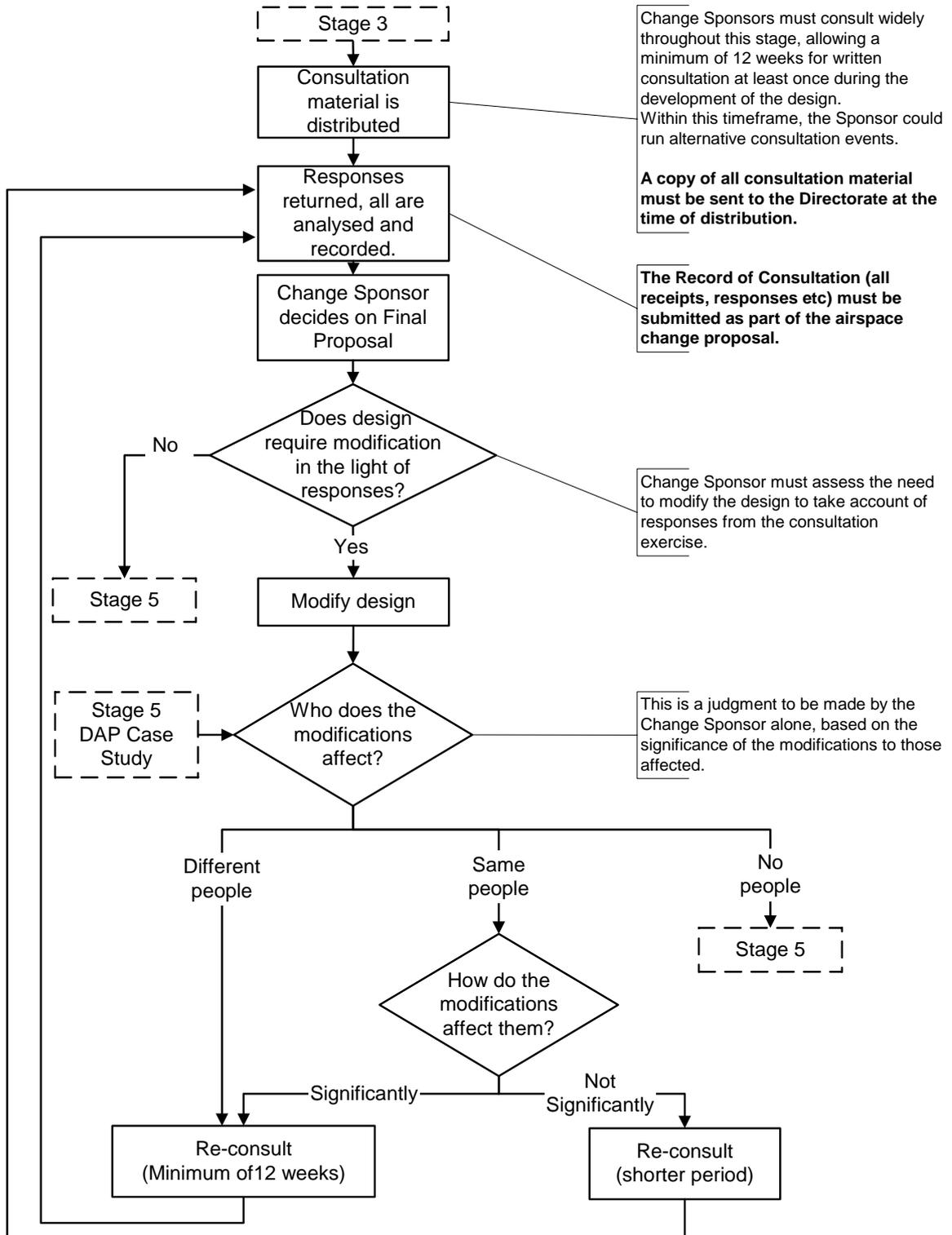


- 1 If consultation is to be successful, it needs to be planned and its effectiveness monitored. Applying the following guidelines should prove beneficial:
- **Integrate:** Make the consultation an integral part of the proposal's development.
 - **Consult early:** Involve people as early on in the development of the proposal as possible – once started, it will be much more difficult to stop or change things if needed.
 - **Be clear:** Set out what it is that needs to be known and why using non technical language, and make it clear to those who are being consulted. Say from the start what is being consulted upon (e.g. routes, timings of operations) and what is not being consulted upon (e.g. safety requirements).
 - **Consult all those affected by the proposal(s):** Current airspace users are important, but what about other users, and those affected by the operations.
 - **Be sensitive:** People could be concerned about criticising the proposal and may not want their personal details published. These wishes should be respected.
 - **Be realistic:** Don not put pressure on people to get involved. Be realistic about the skills and resources that are available, and what is needed to carry out the consultation effectively.
 - **Be flexible:** There are many ways of finding out what people think and want. Some are simple and cost relatively little; others can take months and a significant amount of money. What is done depends on what needs to be known, how the results will be used, how much money, time and expertise is available.
 - **Use more than one method:** Do not rely on any single method of consultation.
 - **Publicise:** Let people know what is happening so that all who want to can input their views. Use the resources available to you – local/regional newspapers and radio stations, some councils have consultation departments. Listen to them and value their contributions.
 - **Help people participate:** Consider the proposals for consultation from the users' point of view. Sending out a questionnaire might be easy, but will enough people want to fill in forms? Don't assume they know something just because others do. Making it simple will encourage more people to participate. Respondents should be able to respond electronically if they choose.
 - **Use plain language:** In whatever method used, avoid jargon or acronyms and design any material with this in mind. It is very likely that there will be a number of consultation documents for different audiences (technical in terms of aviation or environmentalist, general for the public).
 - **Expect the unexpected:** Be aware that the results may be very different from those expected. Don't be discouraged if this happens. A Change Sponsor's credibility will increase if it deals with the more difficult and unexpected results, rather than make the changes that are easiest. Be prepared to challenge long-standing beliefs.
- 2 The Change Sponsor will have already identified all the different parties affected by the design options during the 'stakeholder analysis'. All these parties now form the 'list of consultees' and will need to be consulted. Work now focuses on attaining all the correct contact details. Identifying the most appropriate method of consulting with those affected by the design options is equally important. Whilst the bulk of

consultation will probably be by correspondence, it may also be appropriate to visit organisations or even undertake 'roadshows' in order to explain the proposed change. In many cases, a proposal may need to be adapted in the light of the feedback received.

- 3 It might be useful to use a timetable that identifies completion dates for key tasks associated with the consultation exercise. In circumstances where a number of methods have been used to involve the public to develop a particular design option, the responses gained through these different methods will need to be integrated into the Change Sponsor's final proposal.
- 4 If a decision to utilise Focus Group was made, the Change Sponsor should take every opportunity to seek feedback and aim to gain endorsement on the design options prior to moving to the consultation stage.
- 5 Change Sponsors must conduct their consultation exercise in accordance with the 6 criteria set out in the Cabinet Office's *Code of Practice on Consultation* dated January 2004. In addition to stating the deadline for responses, whether or not responses will be treated in confidence, who consultees should respond to and who to direct queries regarding the proposal, the Change Sponsor must also set out the subsequent stages in the process and when the feedback from the consultation exercise is likely to be published.
- 6 Within the consultation documentation, a Change Sponsor must include details for the Directorate's point of contact that is responsible for overseeing the Change Sponsor's consultation process. The role of this individual only covers complaints regarding the Change Sponsor's adherence to the consultation process; other responses will be referred back to the Change Sponsor. The contact details for this individual are:
 - Business Manager
 - Directorate of Airspace Policy
 - 45-59 Kingsway
 - London
 - WC2B 6TE
- 7 A reasonable period of time must be allowed for consultees to respond to the proposal. The time period will depend on the proposal but a minimum of 12 weeks is considered reasonable; however, Change Sponsors must consider a longer consultation period at certain times of the year, for example during the summer holiday period. This will allow sufficient time for committees to meet and for national bodies to consult their members.
- 8 Once the Change Sponsor has finalised the design options and completed all the necessary consultation documentation, including any charts, adequate time will have to be allowed for publication and distribution to consultees.

STAGE 4 – CONSULTATION



- 1 Consultation is a two-way relationship in which the Change Sponsor asks for, and receives feedback on its design options.

- 2 The Change Sponsor launches the Consultation phase. As it does so, every effort should be made to bring the consultation to the attention of all interested parties. As well as using the Internet, the Change Sponsor should consider publicising the consultation in ways most appropriate for the consultees it wishes to reach. It is likely that there would be a significant period of inactivity during the first few weeks after consultation is launched before responses begin to be received.

A copy of all consultation material must be sent to the Directorate at the time of distribution.

3 Recording Results

- 3.1 The Change Sponsor must be able to demonstrate that all reasonable steps have been taken to elicit a response from consultees. When the consultation's deadline for response notified in the consultation documentation is approaching, it is recommended that follow-up letters are distributed to all those who have yet to reply, particularly if the response rate is low. On receipt of an objection without any accompanying explanation, the Change Sponsors should request the reason for the objection; a meeting between the Change Sponsor and an objector may be appropriate.
- 3.2 The Change Sponsor must ensure that accurate and complete records are kept of all responses, whether received through a formal written consultation or more interactive methods. Copies of all correspondence between Change Sponsors and consultees, together with an audit trail of any changes to the proposal that arise from the consultation, are to form part of the Change Sponsor's formal proposal submission to the Directorate. An example of a Consultation Record Sheet can be found at Annex F.
- 3.3 If a number of design options were consulted upon, the Change Sponsor must select the design option it intends to submit to DAP as its formal proposal.

4 Modifications to the Design and Second Round of Consultation

- 4.1 Commitment is key to effective consultation. The Change Sponsor must be prepared to respond to what it learns and to make changes – even if this requires major modifications.
- 4.2 If there is a need to modify the design to take account of responses from the consultation exercise, the Change Sponsor must consider the significance of the modifications both in terms of the people affected and the severity of the effects. Any change to the proposal that introduces additional airspace or routes not originally consulted on, or alters the intended use of existing or proposed airspace, is likely to require a second round of consultation. Where a second round of consultation takes place on the basis of modifications made in the light of earlier consultation, a shorter period may also be appropriate. However, if completely new parties are now affected by modifications, the minimum 12-week consultation period must apply.
- 4.3 If a second round of consultation is needed, it will be necessary for the Change Sponsor to keep separate, accurate and complete records of all responses from this

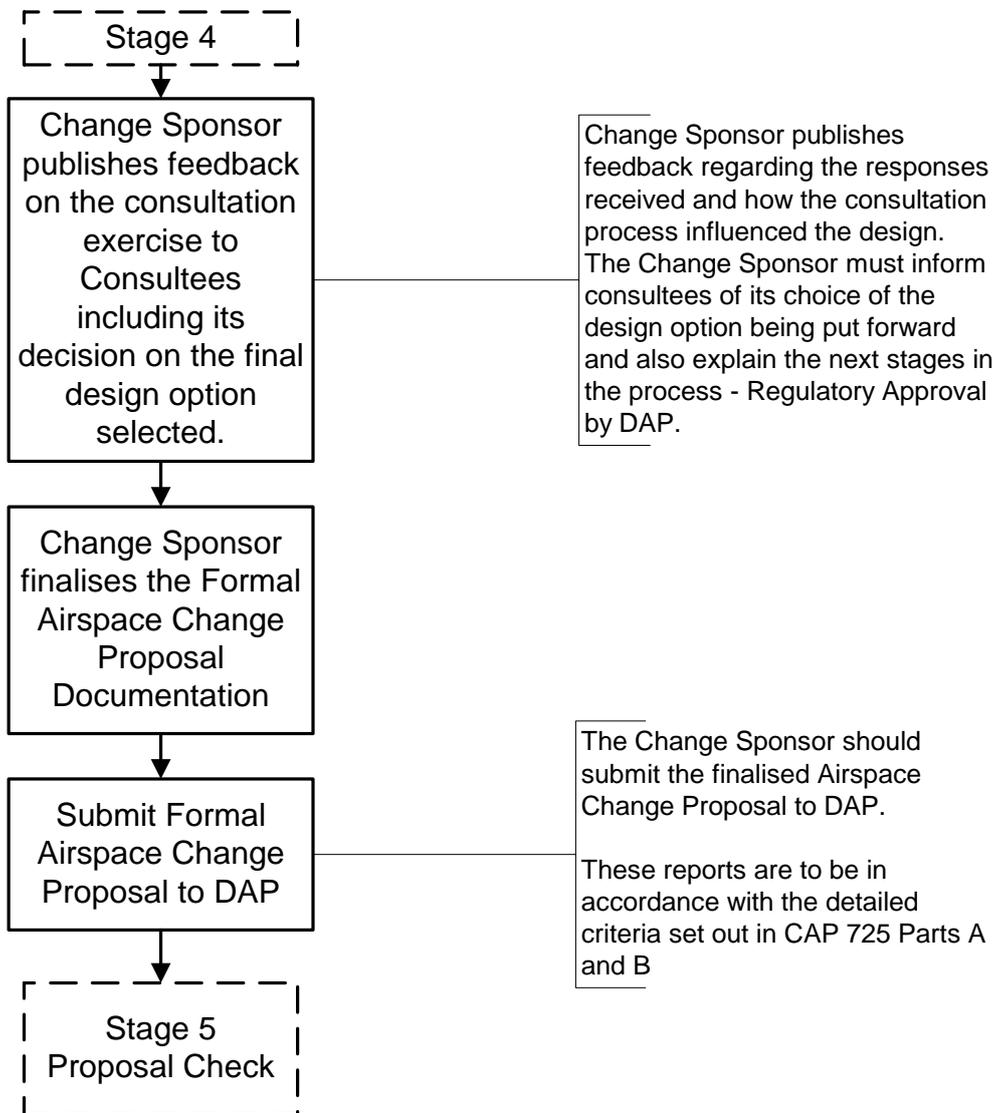
second round, whether received through a formal written consultation or more interactive methods. Copies of all correspondence between Change Sponsors and consultees, together with an audit trail of any changes to the proposal that arise from the second round of consultation, are to form part of the Change Sponsor's formal proposal submission to the Directorate. Similarly, the Change Sponsor must be able to demonstrate that it has taken reasonable steps to elicit a response from consultees.

- 4.4 The Change Sponsor may need to negotiate certain issues and reach a balanced judgement in order to reach a decision on the final design option. In all cases, the Directorate needs to know how the final design option was selected as a result of Change Sponsor Consultation. Equally, the Change Sponsor may consider, for good reason, that it is not possible to modify the proposal. In this case the matter should be brought to the attention of the DAP and the consultee informed accordingly.**

5 Analysing the Results

- 5.1 The Consultation Record Sheet also allows for the Change Sponsor to identify the key issues and themes etc that emerge from its consultation exercise. It is important to be able to separate the practical or realistic issues and themes from those that cannot be addressed (e.g. when an objection relates to an aspect of Government policy and would therefore be beyond the remit of the Change Sponsor). Further guidance on handling such cases would be covered in the Framework Briefing and would be available from the Directorate's Focal Point. The analysis of the consultation should examine the issues and themes and consider their impact on the proposals.

STAGE 5 – FORMAL PROPOSAL SUBMISSION AND REGULATORY APPROVAL



1 Feedback from the Consultation Exercise

- 1.1 The Change Sponsor should prepare and publish an outline response based on the analysis of the responses from the consultation exercise. This should set out the key themes identified by the consultation and how it is proposed to resolve them. Explanations of why popular recommendations have not been carried forward must be included. The Sponsor should also briefly explain the next stage in the process - Regulatory Approval by DAP - and highlight the role of the Director, Airspace Policy, as being that of the 'Decision-Maker'.

- 1.2 Having completed the Airspace Change Proposal, the Change Sponsor should formally submit it to the Directorate for Regulatory Approval. **There must not be any aspects within the Change Sponsor's Formal Proposal to the Directorate that have not been consulted upon unless the Change Sponsor can fully support the omission with good reasons.**
- 1.3 Within the formal proposal, the Change Sponsor will need to have identified a preferred AIRAC target implementation date and an alternative date (or dates), these dates having been agreed, in principle, with Directorate staff. Should the change be approved, the Directorate and Change Sponsor will endeavour to implement the change in accordance with the Change Sponsor's requirements, subject to any subsequent agreement to do otherwise or in the event of any unforeseen circumstances.
- 1.4 Change Sponsors should note that, following a decision by the Director, Airspace Policy, to approve an airspace change, actual implementation could take up to three months to complete, the precise timescale being dependent upon AIP publication cycles. It is therefore imperative that Change Sponsors should identify, within their formal proposals, realistic implementation dates that would allow for proper consideration (by DAP) of any further consultation on the proposal that might become necessary, and for the proper drafting and promulgation of documentation, including, where appropriate, VFR chart changes. In most cases, promulgation would be not less than 1 AIRAC cycle (i.e. 28 days notice after the publication of the relevant documentation) prior to effective date, although for major changes (for example those involving extensive new procedures, cross-border airspace, etc.) 2 AIRAC cycles (i.e. 56 days) would normally be necessary.

2 Regulatory Approval

- 2.1 There are two main activities associated with the Regulatory Approval stage. First, the proposal will be checked to see if all the specified documentation is included as part of the proposal submission [See Figure 1 below]. The second and most important activity is the analysis of the technical merits behind the proposal against the stipulated requirements (the Case Study) [See Figure 2 over].

3 DAP Proposal Check

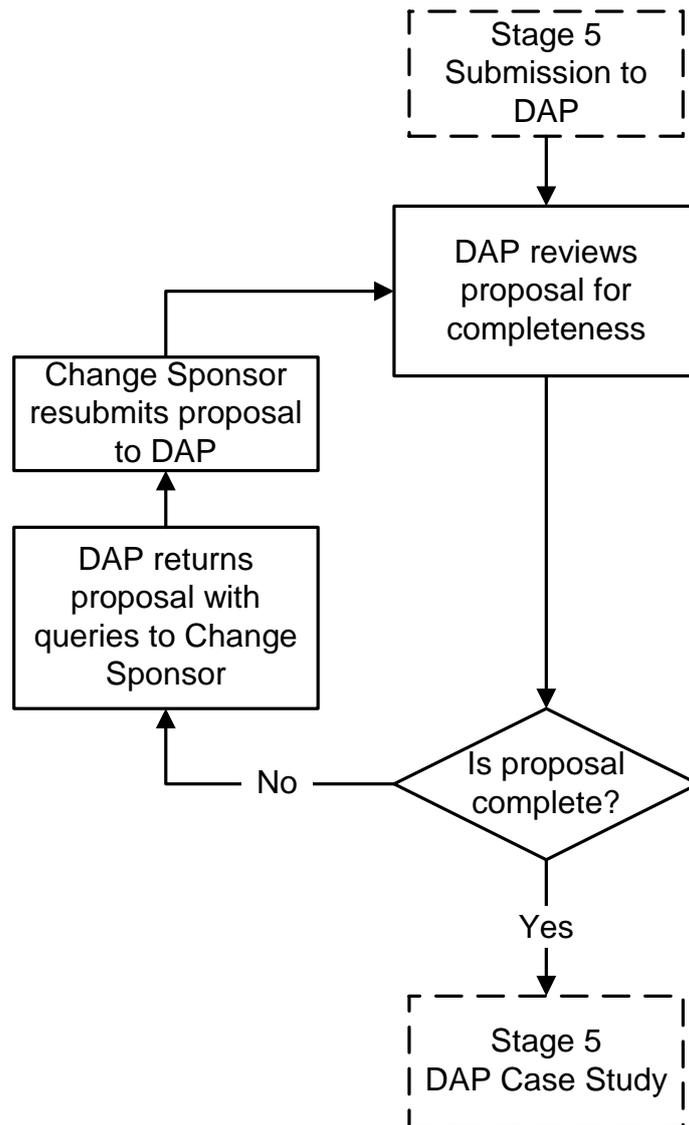


Figure 1

3.1 During the Regulatory Approval stage, the Directorate will initially assess the proposal to ensure it meets with the proposal requirements described at Annex D. Following this, the Directorate will either confirm acceptance of the proposal documentation or request further information from the Change Sponsor in order to complete the proposal. Progression to the Regulatory Approval stage cannot be made until the Directorate has confirmed acceptance.

4 DAP Case Study

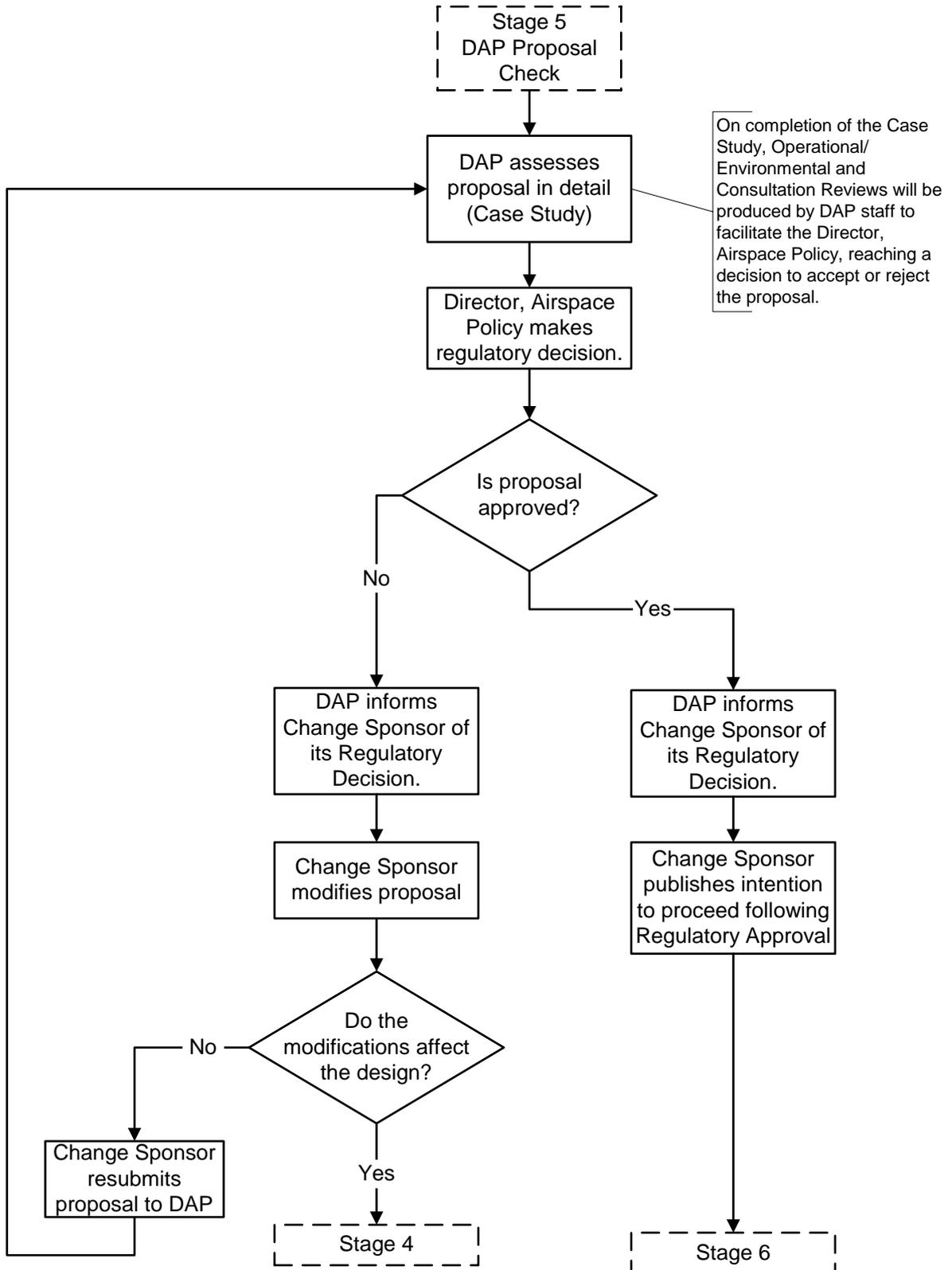
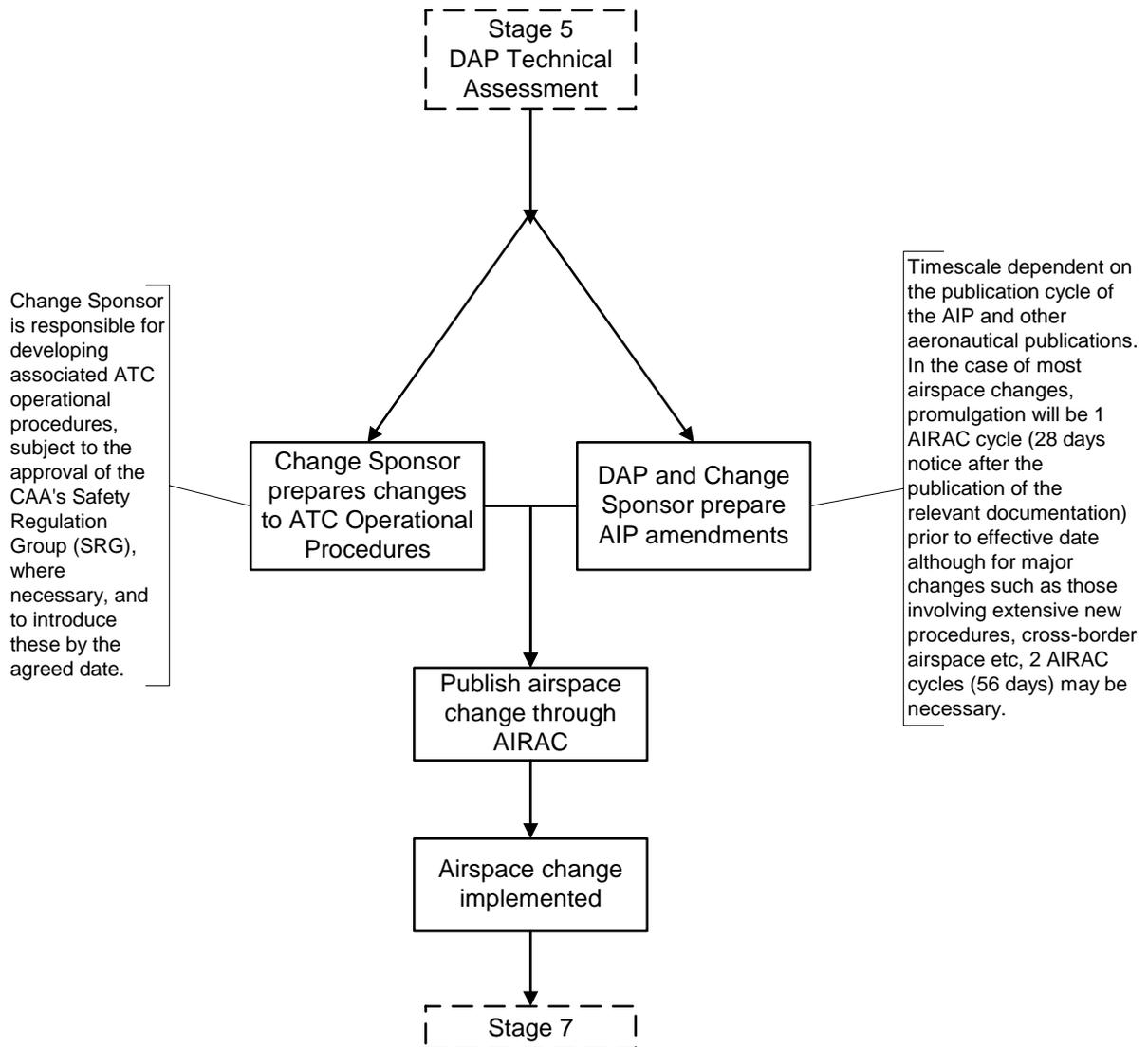


Figure 2

- 4.1 Once the proposal has been initially assessed for completeness, it will progress on to the next element of Regulatory Approval, the Case Study, the purpose of which is to allow the Directorate the opportunity to satisfy itself that the proposal is justified in all respects. This will involve the participation of other CAA departments, primarily the Safety Regulation Group (SRG). Exceptionally, when considering a particularly complex change proposal, the Change Sponsor may also be invited to contribute to this stage of the process.
- 4.2 The aim of the Case Study is to enable the Directorate to determine whether there is a case for an airspace change and whether that case is answered by the formal proposal; in particular, to:
- a) agree that the proposal fully meets the requirement and recommend to the Director, Airspace Policy, that the proposal be approved;
 - b) seek supplementary information on the proposal from the Change Sponsor in order to conclude the Case Study at a later date;
 - c) recommend to the Director, Airspace Policy, that the proposal be rejected, and explain why this should be the case.
- 4.3 In each case, Change Sponsors will be notified immediately of the outcome of the Case Study's recommendations to the Director, Airspace Policy.
- 4.4 During the Case Study, all the information provided within the airspace change proposal will be scrutinised and assessed against the Directorate's Proposal Requirements. The Case Study may reveal areas of potential weakness in the proposal that may need remedial action by means of clarification questions or further development. In such cases the Directorate will submit clarification questions to the Change Sponsor, stipulating the timescale (usually 28 days) in which a response must reach the Directorate so as to facilitate the earliest resumption of the Case Study. Change Sponsors should note that the process timeline would be suspended pending the Directorate's receipt of the supplementary material. This could result in delaying implementation of the proposed change by at least one AIRAC cycle or, where complex changes are involved, 2 AIRAC cycles.

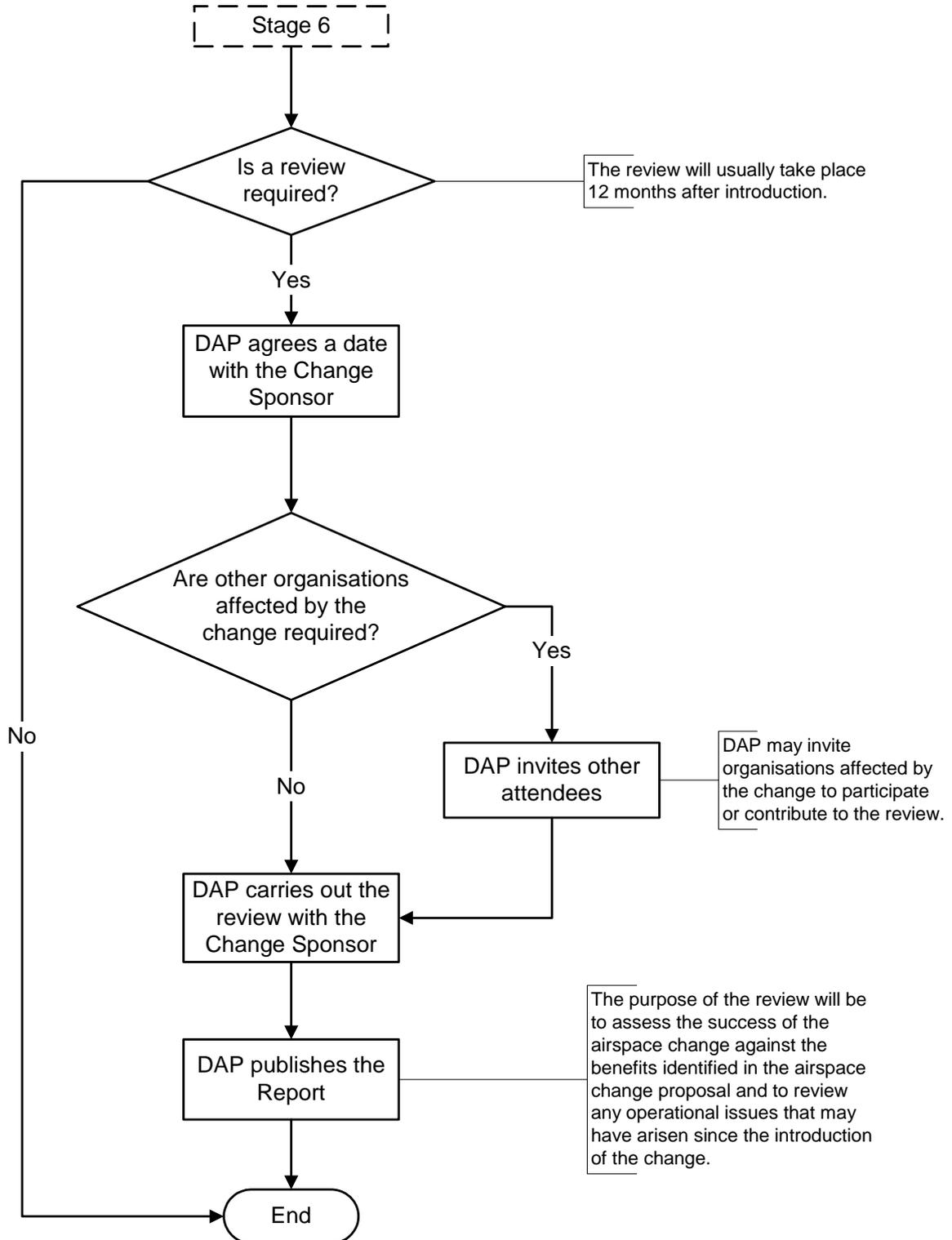
STAGE 6 – IMPLEMENTATION



- 1 Following final approval of an airspace change proposal, the Directorate will, in conjunction with the Change Sponsor, carry out the necessary actions to promulgate the change in the UK AIP. The effective date of an airspace change will, of course, have been previously agreed between the Directorate and the Change Sponsor, the preferred and reserve implementation dates having been stated in the formal proposal.
- 2 The exact timescale for the promulgation of a particular change will be dependent upon the nature and scale of the change proposal and the AIP publication cycle. In the case of most airspace changes, promulgation will be not less than 1 AIRAC cycle (i.e. 28 days notice after the publication of the relevant documentation) prior to effective date of a change, although for major changes, for example those involving extensive new procedures, cross-border airspace, etc., 2 AIRAC cycles (i.e. 56 days) will normally be necessary. Given sufficient notice, it may also be possible to adjust the publication cycles of the Directorate's various VFR charts, in order to incorporate airspace changes as close to their implementation date as possible.

- 3 As part of the implementation process, Change Sponsors need to consider the extent of the AIP amendments their airspace change will generate. Changes that result in Flight Planning arrangements must be co-ordinated with NATS. In the case of terminal airspace changes, these may go beyond the Change Sponsor's entry in the Aerodrome (AD) section and require changes to the En-Route (ENR) and General (GEN) sections or indeed the AD entries of adjacent aerodromes. Similarly, en-route or off-route changes may impact upon SIDs, STARs, instrument flight procedure and terminal airspace structure charts within the AD section. En-route or off-route changes may also impact upon the airspace structures of adjoining States. Consideration must, therefore, be given to the impact upon the AIP as a whole, and possibly the AIPs of neighbouring States; Directorate staff are available to provide advice and assistance to Change Sponsors in this aspect of the Airspace Change Process.
- 4 Following the decision to implement an airspace change proposal, it will be necessary to take action to bring the change to the attention of the aviation community in addition to the formal promulgation. This will initially take the form of an AIC outlining the details of the change (including effective date and, where appropriate or feasible, a map of the revised airspace structure). Ideally, any such AIC should be published at least a month prior to the distribution of the AIP amendment containing the airspace change.
- 5 Change Sponsors should also consider how they intend to notify the members of the local community and other stakeholder groups whom they have consulted on the outcome of the consultation and planned dates for implementation of the changes. In order to publicise a forthcoming change to as many airspace users (and perhaps service providers) as widely as possible, there may be a need for articles to be submitted to the MoD and (for example) the commercial GA press, local GA events or the local press. These can be as brief or as detailed as considered necessary.
- 6 Finally, Change Sponsors must ensure that sufficient numbers of suitably qualified staff are available to provide air traffic services following the implementation of a change. To that end, implementation planning must address training and examination requirements (subject, of course, to the nature of the change); specialist advice and input on any such requirements may be sought from ATSD, SRG.

STAGE 7 – OPERATIONAL REVIEW



- 1 Following the implementation of any airspace change, the Directorate will expect the controlling authority (or authorities) of the airspace concerned to monitor and assess the efficacy of the change. Notwithstanding this, the Directorate will seek to carry out a post-implementation review at a date to be agreed following implementation of the change. This will normally be at the 12 month point.
- 2 This is necessary in order to identify any subsequent requirement to bring about further changes to ATC patterns and procedures, and indeed further changes to airspace structures, the need for which can only be determined through operational experience.
- 3 As part of this validation process the Directorate will, in the case of terminal airspace changes seeking modification to, or the creation of, controlled airspace, expect controlling authorities to record the number of CTR and CTA transits and those occasions when requests to cross the airspace is refused. The reason why transit is refused should also be recorded if at all possible.
- 4 The nature of each review will be determined by the scale and impact of the change itself. Reviews of minor changes may be conducted by correspondence, whereas more significant changes may require Directorate staff to visit the unit concerned. In the case of the latter course, at a civil ATSU this may be done in conjunction with a routine periodic SRG inspection. The net result of each review should be the same – to ensure that the revised arrangements are working as anticipated. If this is determined not to be the case, changes to the arrangements may have to be made.
- 5 The Review will need to include an assessment of the environmental impact of the changes. In particular it will be necessary to assess if the anticipated environmental benefits have been delivered and, if not, why not. Maintaining adequate data to support this aspect of the review will be vitally important.

AIRSPACE CHANGE PROPOSAL – ABBREVIATIONS AND ACRONYMS

ACP	Airspace Change Process
AIC	Aeronautical Information Circular
AIP	UK Integrated Aeronautical Information Package (CAP 32)
AIRAC	Aeronautical information regulation and control
ATC	Air Traffic Control
ATS	Air Traffic Service
ATSSD	Air Traffic Services Standards Department (Part of the CAA's Safety Regulation Group)
ATSU	Air Traffic Service Unit
ATZ	Aerodrome Traffic Zone
CAA	Civil Aviation Authority
CAP	Civil Aviation Publication
CAS	Controlled Airspace
CTA	Control Area
CTR	Control Zone
DAP	Directorate of Airspace Policy
DfT	Department for Transport
DTLR	Department of Transport, Local Government and the Regions (transport now the responsibility of DfT)
FIR	Flight Information Region
GA	General Aviation
ICAO	International Civil Aviation Organisation
IFR	Instrument Flight Rules
JFADT	Joint Future Airspace Development Team
JSP	Joint Services Publication
MOD	Ministry of Defence
NATMAC	National Air Traffic Management Advisory Committee
NATS	National Air Traffic Services Ltd
NDB	Non-Directional Beacon
PRNAV	Precision Area Navigation
RNAV	Area Navigation
RNP	Required Navigation Performance
SARPs	Standards and Recommended Practices
SID	Standard Instrument Departure
SRG	Safety Regulation Group (of the CAA)

SSR	Secondary Surveillance Radar
STAR	Standard Arrival Route
TMA	Terminal Control Area
UAR	Upper Air Route
UIR	Upper information Region
VFR	Visual Flight Rules
VOR	VHF Omni-directional Ranging
VRP	Visual Reference Point

AIRSPACE CHANGE PROPOSAL – REFERENCE DOCUMENTS

ICAO Documents

Reference	Title
ICAO Annex 2	Rules of the Air
ICAO Annex 3	Meteorology
ICAO Annex 4	Aeronautical Charts
ICAO Annex 6	Operation of Aircraft
ICAO Annex 10	Aeronautical Telecommunications
ICAO Annex 11	Air Traffic Services
ICAO Annex 15	Aeronautical Information Services
ICAO Annex 16	Environmental Protection
ICAO Doc 4444	PANS-ATM Procedures for Air Navigation Services - Air Traffic Management
ICAO Doc 7030	Regional Supplements
ICAO Doc 8168	PANS OPS Volumes 1 and 2 - Procedures for Air Navigation Services - Aircraft Operations
ICAO Doc 9426	ATS Planning Manual
ICAO Doc 9689	Manual on Airspace Planning Methodology for Determination of Separation Minima

Eurocontrol Documents

Reference	Title
ASM.ETI.ST08.5000-HBK-01-00	Airspace Management Handbook for the application of the Flexible Use of Airspace
Doc 94.70.08 EATCHIP	Report on Organisational Structures and Procedures Required for the Application of the Concept of the Flexible Use of Airspace
NAV .ET1.ST10	Guidance Material for the Design of Terminal Procedures for Area Navigation

National Documents

Reference	Title
CAP 32	The UK AIP (which notifies some UK differences and variations from SARPs and PANS)
CAP 393	The Air Navigation Order, Rules of the Air Regulations, Air Navigation (General) Regulations
CAP 493	Manual of Air Traffic Services Part 1 (which reflects the UK application of PANS-ATM)
CAP 670	ATS Safety Requirements

CAP 724	The Airspace Charter
CAA Paper 91010	Outline of the method for the determination of Separation Standards for future Air Traffic Systems
JSP550	Military Flying Regulations
JSP552	Military Air Traffic Services
DAP letter 8AP/06/04/01 dated 11 August 2003	Safety Buffer Policy for Airspace Design Purposes Segregated Airspace Guidance to the CAA on Environmental Objectives relating to the exercise of its Air Navigation Functions (DTLR January 2002)
ISBN 0 11 702677	The Local Government Companion (The Stationary Office, 2003 edition)

AIRSPACE CHANGE PROPOSAL – OPERATIONAL/ENVIRONMENTAL REPORT

Following the conclusion of Sponsor Consultation the Change Sponsors will need to convince the Directorate of the merits of their change proposal. It is therefore necessary to produce a formal proposal for submission to the Directorate for consideration. In order to ensure that the various areas for assessment by DAP are addressed, Change Sponsors should submit the documentation with clearly defined sections as per the following headings:

- a) Justification for the Change and Analysis of Change Options.
- b) Airspace Description.
- c) Supporting Infrastructure/Resources.
- d) Operational Impact.
- e) Environmental Assessment.
- f) Economic Impact.
- g) Safety Management.
- h) DAP Regulatory Requirement.
- i) Supporting Maps, Charts and Diagrams.

This is a basic structure upon which to build a formal proposal with each heading being applicable to a greater or lesser extent, depending on the context of the proposal. The following paragraphs are provided for guidance/clarification of information expected under each section, however, Change Sponsors should remain aware of the need to add to this basic structure should the need arise (based upon the size and scope of the change proposal).

1 Justification for Change and Analysis of Change Options

- 1.1 The formal proposal must include a clear explanation of the proposed change, reasons why the change is required and the options that have been considered, including the 'do nothing' option. Justification for the proposed option in favour of the other options considered must be included.
- 1.2 Change Sponsors must note that the cornerstone of any justification for the establishment of, or increase to, controlled airspace will be an assessment of the 'threat' posed to the continued safety of operation resulting from the retention of the current airspace structure (i.e. the 'do nothing' option). In addition, the formal proposal must also state the operational efficiency benefits any increase in controlled airspace will confer.

2. Airspace Description

- 2.1 The proposal should provide a full description of the proposed change including the following:
 - a) The type of route or structure; e.g. Airway, UAR, Conditional Route, Advisory Route, CTR, SIDs/STARs, Holding Patterns etc;
 - b) The hours of operation of the airspace and any seasonal variations;
 - c) Interaction with domestic and international en-route structures, TMAs or CTAs with an explanation of how connectivity is to be achieved. Connectivity to aerodromes not connected to CAS should be covered;
 - d) Airspace buffer requirements (if any);

- e) Supporting information on traffic data including statistics and forecasts for the various categories of aircraft movements (Passenger, Freight, Test & Training, Aero Club, Other) and Terminal Passenger numbers¹;
- f) Analysis of the impact of the traffic mix on complexity and workload of operations;
- g) Evidence of relevant draft Letters of Agreement or Memoranda of Understanding, including any arising out of consultation and/or Airspace Management requirements;
- h) Evidence that the Airspace Design is compliant with ICAO Standards and Recommended Practices (SARPs) and any other UK Policy or filed differences, and UK policy on the Flexible Use of Airspace (or evidence of mitigation where it is not);
- i) The proposed airspace classification with justification for that classification;
- j) Demonstration of commitment to provide airspace users equitable access to the airspace as per the classification and where necessary indicate resources to be applied or a commitment to provide them in-line with forecast traffic growth. 'Management by exclusion' would not be acceptable;
- k) Details of and justification for any delegation of ATS.

3. Supporting Infrastructure/Resources

- 3.1 The proposal should include evidence to support RNAV and conventional navigation as appropriate, including primary and secondary surveillance radar (SSR) and other navigation aid coverage together with details of planned availability and contingency procedures. It should also include evidence of communications infrastructure including R/T coverage, again with availability and contingency procedures. The effects of failure of equipment, procedures and/or personnel with respect to the overall management of the airspace must be considered. The proposal must provide effective responses to the failure modes that will enable the functions associated with airspace to be carried out including details of navigation aid coverage, unit personnel levels, separation standards and the design of the airspace in respect of existing international standards or guidance material. A clear statement on SSR code assignment requirements is also required. Finally, the proposal should include evidence of sufficient numbers of suitably qualified staff required to provide air traffic services following the implementation of a change.

¹ To be based upon monthly airport air traffic movement and passenger data as submitted to the CAA's Economic Regulation Group. Guidance on the requisite supporting statistical evidence will be provided to those Change Sponsors who, at the time of the proposed change, do not submit such data to the CAA. All traffic forecast data submitted with an airspace change proposal will be treated in confidence and will not be divulged to other parties without prior consent. As a general rule, traffic forecasts should be provided up to 5 years in advance.

4 Operational Impact

- 4.1 An analysis of the impact of the change on all airspace users, airfields and traffic levels must be provided, and include an outline concept of operations describing how operations within the new airspace will be managed. Specifically, consideration should be given to:
- a) impact on IFR General Air Traffic and Operational Air Traffic or on VFR General Aviation (GA) traffic flow in or through the area;
 - b) impact on VFR operations (including VFR Routes where applicable);
 - c) consequential effects on procedures and capacity, i.e. on SIDS, STARS, and/or holding patterns. Details of existing or planned routes and holds;
 - d) impact on airfields and other specific activities within or adjacent to the proposed airspace;
 - e) any flight planning restrictions and/or route requirements.
- 4.2 Evidence of mitigation of the effects of the change on any of the above must also be provided.

5 Environmental Assessment

- 5.1 An assessment of the environmental impact in the vicinity of the airspace change must be provided. Sponsors are directed to the Guidance on the Environmental Assessment of Airspace Changes for more detail.
- 5.2 Specifically, the environmental assessment must include:
- a) details of the airspace design including lateral and vertical distribution of traffic;
 - b) traffic forecasts – numbers and types of aircraft;
 - c) noise impact;
 - d) climate change impact;
 - e) local air quality (where applicable);
 - f) consideration of tranquillity and visual intrusion (where applicable); and
 - g) economic valuation of environmental impact (if considered appropriate).

6. Economic Impact

- 6.1 Change Sponsors should develop where practicable a short economic impact assessment to include all categories of operations and users likely to be affected by the change. This is to include any forecast capacity gains and the savings or cost associated with resultant changes to track mileage.

7. Safety Management

- 7.1 Safety Management is an intrinsic element of any airspace change. Units should be operating a safety management system in accordance with the provisions laid down in CAP 670 and in the Single European Sky Common Requirements (CRs) or military equivalent arrangements. For airspace changes, the Directorate requires that certain airspace Regulatory

Requirements are satisfied (detailed below at para 15). Civil ATS Change Sponsors should be aware that the SRG (ATSD) will be fully involved in the Case Consideration stage of the process.

8. Regulatory Requirements

- 8.1 A key element of any change proposal is the need to demonstrate that the proposed airspace change complies with the DAP Regulatory Requirements. The Regulatory Requirements are derived from ICAO SARPS and ECAC/Eurocontrol requirements, and any additional requirements to satisfy UK Policy. These are as follows:
- a) The airspace structure must be of sufficient dimensions with regard to expected aircraft navigation performance and manoeuvrability to fully contain horizontal and vertical flight activity in both radar and non-radar environments².
 - b) Where an additional airspace structure is required for radar control purposes, the dimensions shall be such that radar control manoeuvres can be contained within the structure, allowing a safety buffer. This safety buffer shall be in accordance with agreed parameters as set down in DAP letter 8AP/06/04/01 dated 11 August 2003, 'Safety Buffer Policy for Airspace Design Purposes Segregated Airspace.' (*a link to this document will be provided at a later date.*)
 - c) The Air Traffic Management (ATM) system must be adequate to ensure that prescribed separation can be maintained between aircraft within the airspace structure and safe management of interfaces with other airspace structures.
 - d) ATC procedures are to ensure required separation between traffic inside a new airspace structure and traffic within existing adjacent or other new airspace structures.
 - e) Within the constraints of safety and efficiency, the airspace classification should permit access to as many classes of user as practicable.
 - f) There must be assurance, as far as practicable, against unauthorised incursions. This is usually done through the classification and promulgation.
 - g) Pilots shall be notified of any failure of navigational facilities and of any suitable alternative facilities available and the method of identifying failure and notification should be specified.
 - h) The notification of the implementation of new airspace structures or withdrawal of redundant airspace structures shall be adequate to allow interested parties sufficient time to comply with user requirements. This is normally done through the AIRAC cycle.
 - i) There must be sufficient R/T coverage to support the ATM system within the totality of proposed controlled airspace.
 - j) If the new structure lies close to another airspace structure or overlaps an associated airspace structure, the need for operating agreements shall be considered.
 - k) Should there be any other aviation activity (low flying, gliding, parachuting, microlight site etc.) in the vicinity of the new airspace

² Airspace designs will be predicated on a radar or non-radar environment; loss of radar would require contingency arrangements to be developed to ensure continued safety of aircraft operations.

structure and no suitable operating agreements or ATC Procedures can be devised, the sponsor shall act to resolve any conflicting interests.

- l) Airspace changes in respect of ATS Routes and Terminal Airspace (CTR/CTA) structures are subject to additional requirements as specified in the paragraphs below.

8.2 ATS Routes

- a) There must be sufficient accurate navigational guidance based on in-line VOR/ DME or NDB or by approved RNAV derived sources, to contain the aircraft within the route to the published RNP value in accordance with ICAO/Eurocontrol Standards.
- b) Where ATS routes adjoin Terminal Airspace there shall be suitable link routes as necessary for the ATM task.
- c) All new routes should be designed to accommodate P-RNAV navigational requirements.

8.3 Terminal Airspace (CTR/CTA)

- a) The airspace structure shall be of sufficient dimensions to contain appropriate procedures, holding patterns and their associated protected areas.
- b) There shall be effective integration of departure and arrival routes associated with the airspace structure and linking to designated runways and published IAPs.
- c) Where possible, there shall be suitable linking routes between the proposed terminal airspace and existing en-route airspace structure.
- d) The airspace structure shall be designed to ensure that adequate and appropriate terrain clearance can be readily applied within and adjacent to the proposed airspace.
- e) Suitable arrangements for the control of all classes of aircraft operating within (including transits) or adjacent to the airspace in question, in all meteorological conditions and flight rules shall be in place or will be put into effect by change sponsors upon implementation of the change in question (if these do not already exist).
- f) Change sponsors shall ensure that sufficient VRPs are established within or adjacent to the subject airspace to facilitate the effective integration of VFR arrivals, departures and transits of the airspace with IFR traffic.
- g) There shall be suitable availability of radar control facilities.
- h) Change sponsors shall, upon implementation of any airspace change, devise the means of gathering (if these do not already exist) and of maintaining statistics on the number of aircraft transiting the airspace in question. Similarly, change sponsors shall maintain records on the numbers of aircraft refused permission to transit the airspace in question, and the reasons why. Change Sponsors should note that such records would enable ATS Managers to plan staffing requirements necessary to effectively manage the airspace under their control.

- i) All new procedures should, wherever possible, incorporate Continuous Descent Approach (CDA) approach profiles after aircraft leave the holding facility associated with that procedure.

8.4 Off-Route Airspace Structures

- a) If the new structure lies close to another airspace structure or overlaps an associated airspace structure, the need for operating agreements shall be considered.
- b) Should there be any other aviation activity (military low flying, gliding, parachuting, microlight site etc.) in the vicinity of the new airspace structure and no suitable operating agreements or ATC Procedures can be devised, the sponsor shall act to resolve any conflicting interests.

9. Diagrams, Charts and Documents

- 9.1 Formal proposals must include diagrams and descriptions of the airspace proposed, clearly showing the dimensions and WGS84 co-ordinates of the proposed changes. The division of complex airspace structures must be clearly annotated, in accordance with charting convention as far as possible. An explanation for each proposed structure must be given to substantiate the need.
- 9.2 Charts should be drawn to a clearly stated scale, and the formal proposal must contain at least one chart showing the change proposal in its entirety. Similarly, an overlay of proposed changes must appear on at least one current airspace chart in order to illustrate the difference between current and proposed structures. In most cases, the CAA 1:500000 series VFR charts can form the basis of such drawings, although it is recognised that 1:250000 VFR or other charts will suffice, subject to the nature of the proposed change.
- 9.3 The Change Sponsor must include draft amendment (F933s) to reflect any changes to the UK Aeronautical Information Publication (AIP) including changes affecting adjacent airspace structures. A list of current UK AIP pages affected by the proposed change must be included in the detail of the proposal.

AIRSPACE CHANGE PROPOSAL – METHODS OF CONSULTATION

Consultation is the only way to ensure that the proposal has taken account of the interests of all airspace users and the society. There is no right method for any given circumstance. All sorts of conditions influence which method will provide useful information and there are no guarantees that just because one method worked well once it will do so again. Therefore, this part of the guidance is designed to help the Change Sponsor get started. It does not set out to debate the philosophy behind consultation, but gives general 'good practice' advice about consultation, introduces some of the commonly used ways of consulting, sets out some of the issues to think about when considering each method, and summarises the pros and cons of the different methods of consultation.

Benefits of consultation:

- Enable user and other stakeholder requirements to be identified by the Change Sponsor thus ensuring the airspace arrangements are, wherever possible, able to meet all stakeholder requirements.
- Fosters a working partnership between the airspace users, the Change Sponsor and those affected by its operations.
- Identifies problems quickly, offering an opportunity to put things right before they escalate.

Consultation Methods

1. Questions in Written Consultation Documents

1.1. Asking the right questions will:

- Make it easier for stakeholders to reply to the consultation;
- Collect evidence to test the Change Sponsor's assumptions on the change proposal;
- Help to unearth anything that had not been anticipated;
- Persuade stakeholders that the consultation is genuine and that their views and experience are valued;
- Increase the likelihood of quality and quantity of responses; and
- Make the task of analysing responses easier.

1.2 Do not start drafting the questions until after the proposal has been written. From the outset, keep a note of any issues that are unclear or uncertain and for which further evidence and opinion is needed.

1.3 Different types of Question

The type of questions asked depends on what stage of the proposal is being consulted upon.

1.3.1 Open questions

- Provide qualitative responses – ideas, opinions and comments.
- Provide range and depth.
- Respondents can qualify their answers.
- Not easy to quantify numerically, unless a coding frame has been drawn up.

- Answers can be misinterpreted.
- Answers may not be analysed impartially.

1.3.2 Closed questions

- Provide specific data.
- Easy to complete, especially with people with little time to spare.
- Easy to analyse and report.
- Provides clear information on the level of support.
- Because percentages of responses can easily be obtained, this should only be interpreted to give an indication of the weight of views and of course should not be interpreted as representing the level of support within the total population.
- Can draw misleading conclusions from a limited range of options.
- Do not capture qualifications to answers e.g. “Yes, but....” or “It depends....”.
- May discourage a stakeholder from giving information about any unanticipated implications not covered in the consultation document.

1.3.3 General questions

- Convey that the Change Sponsor is open to receiving a wide range of views.
- Can mislead stakeholders about the extent to which the airspace change proposal can be influenced and so changed.

1.3.4 Detailed questions

- Convey the impression that the Change Sponsor really is interested in the views of stakeholders.
- Help provide feedback on the specific areas of uncertainty.

1.4 **How to use Questions in a Consultation Document**

- Use a mix of open and closed questions.
- Use a mix of general and detailed questions.
- Keep the number of questions to a minimum.
- Allow adequate space for answers without leaving too much space.
- Avoid double- barrelled questions “Do you understand and support...”.
- Ask respondents to comment on any unintended consequences.
- Include a final question asking for any relevant comments.

2 Consultation Questionnaires

2.1 Instead of including questions in the consultation document, consider producing a separate questionnaire.

2.1.1 Questionnaires:

- provide structure to a consultation exercise;
- can draw together questions already contained within the document;
- can include both open and closed questions;
- should include paragraph references to the relevant section in the consultation document;
- can be included with a document or separately;
- can be easily integrated with answers from online consultations;
- are easier for stakeholders to respond;
- increase the likelihood that all questions are answered;
- are easier to analyse;
- should never be compulsory; be clear that respondents can submit their comments in any format.

3. Questionnaire-based Surveys

3.1 Quantitative research gives statistics in response to set questions. For instance, it could tell a Change Sponsor what proportion of those affected by its operations would like to see start times put back an hour later each day. It also allows the Change Sponsor to get views from a widely representative group, and can give statistically reliable information. It is therefore essential to engage expert advice in the development of questionnaires.

3.2 Quantitative research will tell the Change Sponsor what proportion of people think something but, unless it is planned carefully, it won't provide the reasons why. It can also fail to pick up on what are viewed as being the significant problems as these were not considered when drafting the questions.

3.3 Points to think about:

- **Preparation:** Read other surveys, its results, the questionnaires and the evaluation of the process.
- **Questions:** The usefulness of the survey will depend on the questions (See 1). It is only too easy to carry out surveys that ignore the issues that are important to others. Discussion groups can help find out what questions should be asked.
- **Testing:** Pilot the questionnaire on a small group. Can they understand the questions? Does it produce meaningful results? Will the results help? Avoid leading questions, and only ask one question at a time.
- **Relevance:** Do not ask a question if the results cannot be acted upon.
- **Design:** Pay attention to the design and layout of survey forms. A large print size, plenty of space for people to write, clear instructions and questions, putting everything in a logical order and asking for personal information at the end rather than the beginning will all increase the chances that people will fill in the form. People may be put off by a very long questionnaire.

- **Expertise:** If complex questions need to be asked, it might be better employing someone to conduct interviews rather rely on a self-completion questionnaire.
- **Confidentiality:** Allow people to make their comments anonymously. Make it clear that opinions will not be published in such a way that individuals can be identified, unless there will be a need to quote responses, in which case permission must be sought.
- **Responses:** Sample sizes and response rates will vary according to the sort of survey method being used, who is being asked and what is being asked. Response rates to postal surveys can be as low as 5-10% if they are sent cold. A Change Sponsor can improve results by sending out a 'warning letter', designing the survey carefully, include pre-paid envelopes, personalised letters and a 'reminder letter' when nearing the closing date (but allowing time for responses to be sent) etc., never expect a 100% response.

3.4 Advantages of using Questionnaire-based Surveys

- A very good method of obtaining reliable statistical information.
- Requires relatively low level of interaction.
- Provides the ability to analyse large samples quickly.
- Can be low-cost.
- Good method of getting views of non-user groups.

3.5 Disadvantages of using Questionnaire-based Surveys

- A poorly designed survey, with poorly drafted questions, can give misleading results.
- If only a small number of people respond, results will be unreliable.
- A lot of time and money can be involved in analysing results.
- Difficult to obtain qualitative information.
- Can be costly.

3.6 Costs: Varies depending on how the survey is done and how large the sample is. An in-house postal questionnaire can be relatively cheap.

3.7 Use to: Discuss general issues. Can be targeted to particular groups and focussed on specific issues.

4. Using Representative Groups

4.1 Many, mainly voluntary, organisations know what is happening within their groups, and are in a good position to give an indication of what people will think about the proposals and the specific problems people will have with it. Representative Groups may be made up of people who have a particular interest in a subject and have strong views, and this needs to be taken into account. They should not be used as the only means of consultation, but will be a useful source of qualitative information about the effects of the proposal. They can also help find out where more in-depth research is needed.

4.2 Representative Groups are a ready-made source of information. They may carry out their own research or be able to provide feedback on their experiences. Involving them during the development of the proposal before going to wider consultation can be invaluable.

4.3 Points to think about:

- **Finding groups:** A Change Sponsor may already have had dealings with, and knowledge of these groups. Local councils usually maintain databases of the groups in their areas or they may be recorded in various regional directories.
- **What they do:** Find out what the group does, who it represents, its priorities, what are its specific interests, how it carries out its work and so on.
- **Involving them:** Discuss how best to work together - meet individual groups, or hold forums where several groups get together.
- **How they can help:** Think about whether organisations could help by carrying out research. But don't always expect them to do it for nothing; they may be cheaper than a commercial organisation, but running voluntary organisations costs money.
- **Timing:** Give voluntary bodies time to respond, they are busy and have limited resources.

4.4 Advantages of using Representative Groups

- Numbers to be dealt with are more manageable.
- Provides an ability to tap into information being collected by independent organisations.
- Can provide quantitative and qualitative information.
- Can help get views of particular groups.
- Relatively quick and cheap.
- Provides a chance to explore views in depth.
- Allows for the ability to discuss detailed solutions with people with some technical knowledge.

4.5 Disadvantages of using Representative Groups

- Depending on type of organisation, the group may contain particularly motivated people who are not fully representative of the users or those affected.
- May not provide statistical information.
- Finding the right group and maintaining records of existing groups can be very time consuming.
- Groups may require a considerable amount of time to respond.

4.6 Costs: relatively cheap.

4.7 Use to: discuss general and specific issues of relevance to the proposed airspace change.

5. Focus Groups

5.1 Focus groups are usually made up of around 8-10 people led by a trained facilitator in a one-off discussion on a particular topic. Like individual interviews, focus groups can explore issues in considerable depth, and have the advantage that people can bounce ideas off others.

5.2 Focus groups are particularly useful for finding out what specific groups of people think of the proposed change.

5.3 Points to think about:

- **Composition:** Although it is tempting to try to get a group to be fully representative of all users or the public, experience has shown that the smaller group leads to more effective communication. It may require more than one discussion group to investigate views of more than one part of the community. The timing of the focus group meetings will need to fit in with the needs of all its members.
- **Expertise:** It is important to use a skilled facilitator to run the groups. They will make sure that everyone has a chance to speak and move the discussion along without imposing their views.
- **Focus:** Start with something relatively simple with real boundaries.
- **Valuing participants:** Show participants that their contribution are valued by making sure that they have clear information about what their role is, and that all practical arrangements run smoothly. It is often the little things that are important – giving participant clear directions to the venue or how long the discussion is likely to take.
- **Incentives:** It is often a good idea to follow up an invitation with a telephone call the day before the focus group, and it is may be appropriate to offer to pay for travel expenses.
- **Preparation:** It is important to prepare for the focus group carefully. Draw up a list of questions or areas that wish to be covered. Although the groups should be fairly flexible and informal; a structure that makes sure that the significant areas are covered, and that other issues do not take over the conversation, is important.
- **Recording:** Consider tape recording sessions to allow for more detailed analysis afterwards. But normal notes are also important because, for example, the use of visual aids would be difficult to record on tape.

5.4 Advantages of using Focus Groups

- Identification of what is considered important.
- Individuals may feel more confident in groups and say things they would not say on their own.
- Groups allow people to spark ideas off one another.
- Provides information about what people think and why.
- Can help get any messages across better.

5.5 Disadvantages of using Focus Groups

- Must use experienced facilitator (cost).
- Group views can tend to the norm (although a good facilitator will help avoid this).
- Difficult to prioritise issues.
- Does not provide statistical information – gives the ‘why’, not the ‘how many’.
- Feedback will not be typical of the views of users or those affected.
- Lack of confidentiality in the group may inhibit some participants.

6. Open/Public Meetings

- 6.1 Open meetings are meetings arranged for members of the public to find out and express their views on a particular issue. Attendance is open to any interested member of the public. Meetings are usually held at a public place (school, church hall, sports centre) convenient for people to get to. The issue to be discussed is usually publicised in advanced through posters leaflets, letters, invitations etc.
- 6.2 Public meetings often have a low attendance, and those people who do attend often have a particular concern or viewpoint, which is not necessarily representative of the population as a whole.
- 6.3 Open meetings can, however, be a good way of encouraging dialogue and keeping members of the public informed. Used carefully, they can complement other forms of consultation.
- 6.4 Points to think about:
- **Issue:** The proposal will clearly have an impact on attendance. More people come if they are directly affected by or concerned about the issue, or where their interest is attracted. Try to make the material advertising the meeting as interesting as possible, but make sure that people who do attend have not been misled about the content. Have clear objectives for what needs to be achieved from the meeting and how this will contribute to taking forward the proposal.
 - **Target audience:** Open meetings are unlikely to attract an audience that is representative of the local population, and may contain more retired and middle-aged people than young people, so do not use them as the only method of consultation. Think about the target audience, and organise a meeting at an appropriate time and location.
 - **Collecting information:** Think about why people might want to attend an open meeting. As well as an interest in a particular issue, people might be motivated to attend by a sense of community spirit or support. A short questionnaire for people who attend could provide this information.
 - **Publicity:** Publicise the meeting as widely as possible to reach the intended audience. As well as posters, leaflets etc., word of mouth is an effective means of advertising. Speak to informal networks, parish councils, community and interest groups.
 - **Practicalities:** Planning the practical side of a meeting can be difficult if the number of people likely to attend is unknown, so the organiser might want to invite people to let them know if they are going to come so there is an indication of numbers.
 - **Meeting structure:** Think about how the meeting will be structured. Make sure that any speakers know what is expected of them (i.e. how long they should speak) and that the Chair is well briefed and is able to control any more vocal members of the audience and limit repetitive discussion. If appropriate, it may be beneficial to break the meeting up into smaller workshop/discussion group to give more people the chance to participate.
 - **Reporting:** Recording views and reporting back can be difficult in open meetings, particularly if there are large numbers of attendees. Make sure someone takes a note of the points raised. People can vote on the main issues but be careful not to place too much weight on these statistics. It must be made clear to participants how their opinions will be taken forward.

6.5 Advantages of using Open/Public Meetings

- Provides local opportunities for people to comment on matters that affect them directly or indirectly.
- Offers a convenient and transparent way to demonstrate public consultation/build up good relationships.
- Can be used to inform the public at the same time as getting views.

6.6 Disadvantages of using Open/Public Meetings

- People who attend are unlikely to be representative of the local population.
- Attendees' ability to contribute to a discussion can be limited due to lack of knowledge and possibly lack of interest.
- Contributions will mainly be about local, topical or personal concerns.

6.7 Costs: Relatively cheap depending on how it is done.

6.8 Use to: Get a feel for public opinion on a particular topic/issue and inform the public.

AIRSPACE CHANGE PROPOSAL – CONSULTATION REPORT

As part of the formal Airspace Change Proposal submission to the Directorate, the Change Sponsor must be able to demonstrate that the consultation feedback has been considered and, where appropriate, integrated into the Formal Airspace Change Proposal.

In order to ensure that the various areas for assessment by the Directorate are addressed, Change Sponsors should submit the documentation with clearly defined sections as per the following headings:

The Consultation Report

- **Overview of Responses**
An overview of all the responses received
- **Useable Responses**
Summary of all the useable responses;
- **How the Responses changed the Proposal**
How the consultation has led to some identifiable change in the proposal;
- **Supporting Documentation**
See below

Supporting Documentation

The Change Sponsor must provide the following supporting documentation:

- A copy of the original proposal (or any subsequent proposals) upon which consultation was conducted;
- Consultation Record Sheets;
- A copy of all correspondence sent by the Change Sponsor to consultees during the consultation exercise;
- A copy of all correspondence received by the Change Sponsor from consultees during consultation;
- A tabular summary record of consultation actions;
- A map (no smaller than A3 size) showing the location(s) of complainants in relation to proposed airspace boundaries, arrival and departure routes, noise contours etc;
- Details of and reasons for any modification to the original proposal as a result of consultation;
- Details of further consultation (written and verbal) conducted on any revised proposal;
- A record of all the actions taken with all consultees, be it through meetings or verbal contacts, must be maintained. The need to close correspondence is important, especially where objections are dealt through mitigation or agreement.
- A copy of the feedback to all consultees.

Consultation Record Sheet (Template)

Serial	Name/Organisation	Date Hastening Letter Sent	Date Response Received	Further Correspondence (Ref No/date)	Date of Meetings	For Neutral/Against Proposal	Key Issues/Themes	Impact of Issues/Themes on the Design Options
1								
2								
3								
4								
5								
6								
7								
8								
9								
10								