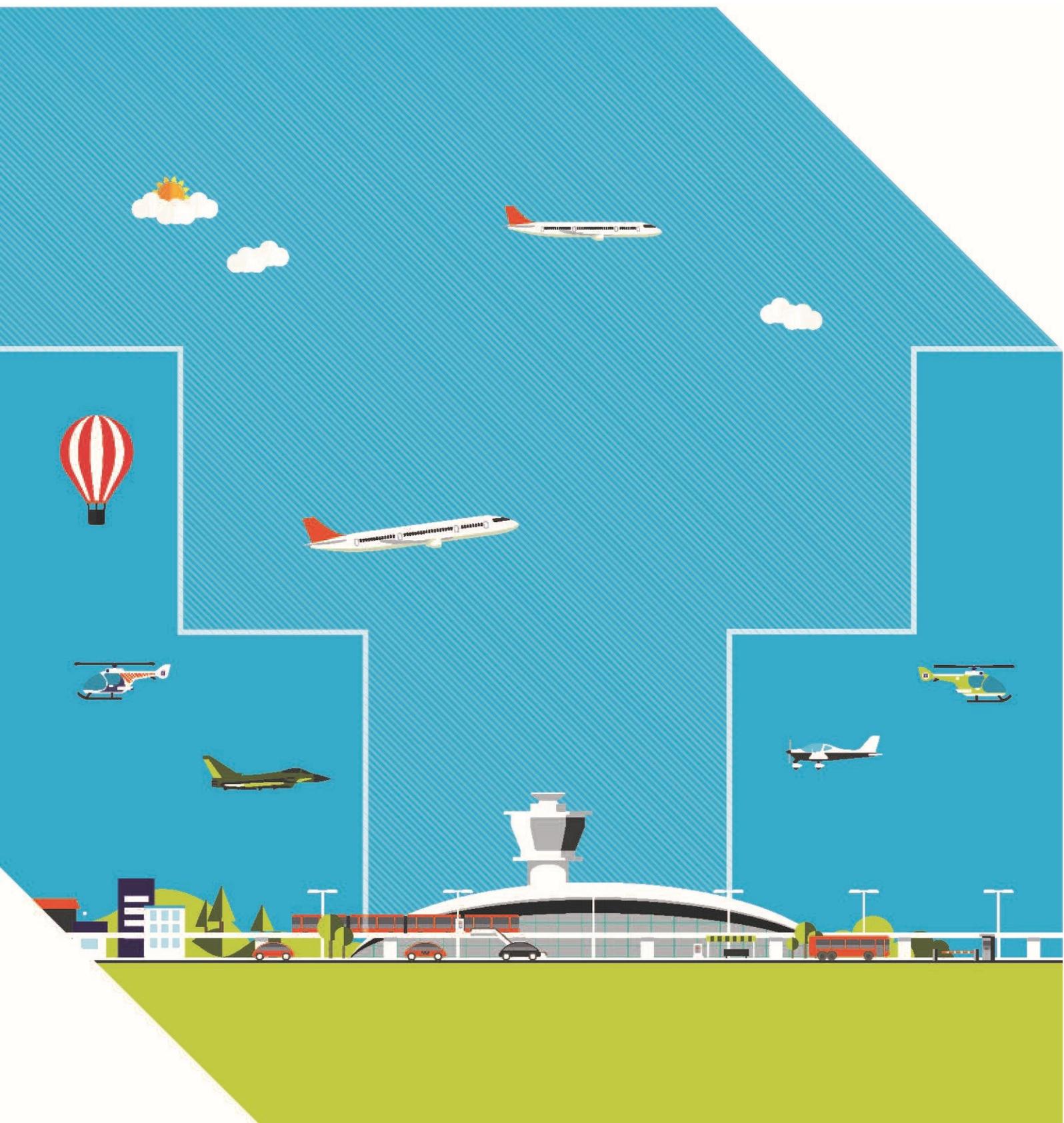


Review of the CAP1616 Airspace Change Process: Report of Engagement Activity: June to November 2021

CAP 2401



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Revision history

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Foreword

CAP1616 was introduced in 2018, following a comprehensive independent review of the previous airspace change process¹. Conscious of the new requirements introduced through CAP1616, the CAA committed to undertake a review three years after its implementation.

The review gives us the opportunity to reflect on the lessons learned from the last three years overseeing CAP1616 and make further improvements to the airspace change process. This report summarises the engagement activities that have been completed to date, having initiated the review in Summer 2021. I appreciate the participation of all stakeholders and welcome the feedback received. All the feedback has been considered and used to identify and develop key themes for airspace change. These themes will drive the review as they will focus relevant reform of the airspace change process. You will learn more about the work we have completed to date and our intended next steps by reading this report.

Looking ahead, we are committed to facilitating a formal consultation on our proposals to modify the airspace change process. While the consultation will be widely promoted, I would encourage all stakeholders to keep abreast of further developments by monitoring the dedicated review webpage².

Finally, I would like to express my thanks to all those stakeholders that have taken the time to contribute to the review so far. Your feedback to date has been highly valuable in the review and will continue to be considered as we move towards consultation and beyond.

We have endeavoured to ensure the findings detailed in this report are reflective of both the views and sentiments from all stakeholders.

Ben Lippitt
Manager Airspace Regulation

¹ [CAP 725: Airspace Change Process Guidance Document \(caa.co.uk\)](https://www.caa.co.uk/CAP-1616/CAP-1616-Review/CAP-1616-Review-Guidance-Document)

² www.caa.co.uk/review-of-CAP-1616.

Executive summary

Overview

Changes to the design of UK airspace can be proposed by an airspace change sponsor. The CAA requires the sponsor of any change to the published airspace design to follow the CAP1616 airspace change process³. CAP1616 was first introduced in January 2018 and a commitment was made to review it three years after its implementation.

This report summarises the engagement activity that we have conducted to date to support the review and outlines our conclusions and next steps.

Scope and objective

The scope of this review is focussed on the regulatory process for permanent and temporary airspace change proposals, as well as airspace trials.

In line with [our regulatory principles](#), our objective is to produce an updated version of CAP1616 which provides a more proportionate and tailored approach to airspace change. At the same time, risks and impacts will continue to be addressed, understood and transparently engaged on for the benefit of all those who use and are affected by airspace changes.

This will be achieved by reflecting on lessons learned since the introduction of CAP1616, where proposed modifications will be informed by stakeholder feedback, our own experiences of the airspace change process, and emergent policy requirements.

We engaged proactively and transparently with stakeholders, reflecting and acting on their combined insight to support the development of a more proportionate regulatory process.

Stakeholder engagement

The review has received contributions from internal and external stakeholders. We were keen to hear from stakeholders working directly with the CAP1616 airspace change process as well as those that were affected by it.

The output from the stakeholder engagement activities has driven the review and helped to focus it on pertinent points. Feedback received to date has been analysed and several key themes have been identified:

³ [CAP1616: Airspace change: Guidance on the regulatory process for changing the notified airspace design and planned and permanent redistribution of air traffic, and on providing airspace information \(caa.co.uk\)](#)

- Process- This theme covers feedback on the way we or our stakeholders move through the CAP1616 airspace change process.
- Document Structure- CAP1616 is a large publication, and this theme relates to the order and navigation of document and its annexes.
- Stages / Steps / Gateways- Each stage has a gateway at the end, where the work of that stage is assessed. Some stages have steps in the middle of them, which lead to output for assessment at gateway.
- Clarity / Guidance-This refers to how clear and comprehensive our stakeholders find the CAP1616 airspace change process and how we can improve this.
- Scalability-There are opportunities within the CAP1616 airspace change process to be proportionate about regulation. This theme explores how we could do this and under what circumstances.
- Engagement, communication and information- This theme looks at how all stakeholders (including us) involved in the airspace change process can have better, more informed, meaningful conversations.
- Public Evidence Sessions (PES)- This theme looks at the aims of the PES in Stage 5 and how we could improve the functionality of it.
- Temporary Airspace Change Proposals- This theme explores how temporary airspace change proposals are working and how we can improve engagement on them; as well as understanding the needs of new entrants to airspace.

Next steps

We welcome the feedback that we have received to date and appreciate the participation of all stakeholders that have contributed so far.

We are currently considering and developing various options to modify the airspace change process, all of which will be driven by the key themes that we have identified. Any modifications which we propose to make will be subject to a formal consultation process, through which we will explain what is being proposed and why. We plan to launch the consultation in winter 2022.

Feedback from the consultation will be reviewed and analysed, with the results presented in a consultation report. It may be necessary to subsequently modify our proposals considering feedback received.

Once the consultation process has been concluded, a report will be produced and decisions about the new airspace change procedure will be recorded and made available via our communications channels.

1.Background

1.1 What is the airspace change process?

- 1.1.1 Changes to the design of UK airspace are proposed by an airspace change sponsor. Sponsors of airspace change could typically be an airport operator, air navigation service provider, an unmanned aircraft operator or even a spaceport. This is not an exhaustive list, and it may change. The sponsor of any change to the published airspace design is required to follow the airspace change process.
- 1.1.2 The airspace change process is structured, comprising of different stages, steps and gateways, depending on the type of airspace change that has been proposed.
- 1.1.3 There are several stakeholders involved in the airspace change process:
- The **Government** sets the legal framework and statutory objectives for the CAA, outlining our functions and responsibilities.
 - The **CAA** is the airspace regulator and primary decision maker. We are responsible for developing and publishing the airspace change process, deciding on changes to airspace design and providing related guidance.
 - The **change sponsor** owns the airspace change proposal and is responsible for developing it.

Stakeholders who may be impacted by airspace change have the opportunity to influence the development of an airspace change proposal through their engagement with the change sponsor.

1.2 History of CAP1616

- 1.2.1 The CAA commissioned an independent review of the previous airspace change process⁴ (known as CAP725) in 2015. The objective of the review was to ensure that the process was fair, proportionate, consistent with legal requirements and that it met modern regulatory decision-making standards.

⁴ [CAP 725: Airspace Change Process Guidance Document \(caa.co.uk\)](https://www.caa.co.uk/~/media/CAA/Images/Supporting%20Information/2015/CAP725%20-%20Airspace%20Change%20Process%20Guidance%20Document.pdf)

- 1.2.2 Following the conclusion of the independent review and publication of a related report⁵, we developed a new airspace change process (CAP1616) that was based on many of the recommendations that had been made.
- 1.2.3 CAP1616 was introduced in January 2018, following two rounds of consultation on our proposals to modify the airspace change process.

1.3 Why engage now?

- 1.3.1 We made a commitment to review the CAP1616 airspace change process three years after its implementation.
- 1.3.2 Whilst the COVID19 pandemic impacted the number of airspace change proposals that we could use as a benchmark for this review, we were still able to learn from our own experiences of working on these proposals, as well as stakeholders' experiences of the process to date.

1.4 Scope of the CAP1616 Review

- 1.4.1 The review is focussed on the regulatory process for permanent and temporary airspace change proposals, as well as airspace trials.

1.5 Who is this report for?

- 1.5.1 This document is intended to be read by stakeholders with an interest in changes that impact airspace, including the following:
- **Sponsors of airspace change** proposals.
 - **Communities affected by aviation noise or other environmental impacts**, their representatives, councils and other elected representatives, bodies with an interest in aviation's environmental impact
 - **Service providers** such as air traffic control and airports
 - **Airspace users**, including airlines and other commercial operators, General Aviation and the Ministry of Defence
 - The **users of air transport services**, i.e., passengers and air freight/cargo providers and customers.
 - **All other interested parties.**

⁵ [CAP1356: Helios report: Independent review of the Civil Aviation Authority's Airspace Change Process \(caa.co.uk\)](https://www.caa.co.uk/~/media/CAA/Images/Supporting%20Information/2018/CAP1356%20Helios%20report%20Independent%20review%20of%20the%20Civil%20Aviation%20Authority's%20Airspace%20Change%20Process.pdf)

2. Overview

2.1 How the report is structured

- 2.1.1 This report explains what we did (our methodology and approach), what was said (feedback) and our response. How we engaged (what we did) is detailed in Chapter 3 and our analysis of the feedback is presented in Chapter 4, alongside our response to it. The actions (Next Steps) we propose to take are set out in Chapter 5.
- 2.1.2 Related appendices to the report include:
- Appendix A Copy of the Citizen Space Survey engagement
 - Appendix B Workshop Stakeholder List
 - Appendix C: Overview of the CAP1616 Airspace Change Process (Permanent)
 - Appendix D: Overview of the CAP1616 Airspace Change Process (Temporary)

2.2 Chronology of engagement

- 2.2.1 In June 2021, three internal workshops on the airspace change process took place. Between July and September 2021, we facilitated five workshops with external stakeholders.
- 2.2.2 Feedback from these sessions informed the content of an engagement survey. The survey was live on the Citizen Space engagement platform for the whole of November 2021 (30 days).

2.3 More about who authored this report

- 2.3.1 This report was completed by the CAA's Airspace Regulation team. Airspace Regulation is responsible for the regulatory oversight of the CAP1616 airspace change process.

3. How we engaged (what we did)

3.1 Overview

3.1.1 To support the review, we used a mixed method approach. Both qualitative and quantitative approaches were used across engagement activities conducted by the CAA. Each engagement activity informed the next, reflexively. In total, engagement activities for this part of the review took six months.

3.2 Airspace Change Organising Group (ACOG)

3.2.1 ACOG is tasked with coordinating the delivery of key elements of the UK's Airspace Modernisation Strategy and is working collaboratively with stakeholders from across the aviation sector to develop and deliver the Airspace Change Masterplan. It has also coordinated a CAP1616 'lessons learned' exercise with change sponsors, presenting a report to the CAA that included several recommendations for consideration. The 'ACOG Lessons Identified' report provided a useful starting point for the engagement activities that followed.

3.3 Internal Workshops

3.3.1 Internal workshops included subject matter experts from different areas of airspace regulation (i.e. technical, engagement & consultation, environment, economic, instrument flight procedure). The subject matter experts provided insight based on exposure to a range of airspace change proposals; and the different stakeholders involved in the process. Account managers (responsible for coordinating the CAA's oversight of individual airspace change proposals) were also included. Account managers bought an overview of airspace change proposal timelines and the ability to identify recurrent issues in airspace change proposals.

3.3.2 Three workshops were conducted during June 2021, via Microsoft Teams. Each one reviewed a different part of the CAP1616 airspace change process:

- **Workshop 1:** Stages 1 and 2 of the permanent airspace change process.
- **Workshop 2:** Stages 3, 4 and 5 of the permanent airspace change process.
- **Workshop 3:** Regulatory process for temporary airspace change proposals and airspace trials.

- 3.3.3 Key themes from the internal workshops were identified and subsequently discussed during the workshops with external stakeholders.

3.4 External Workshops

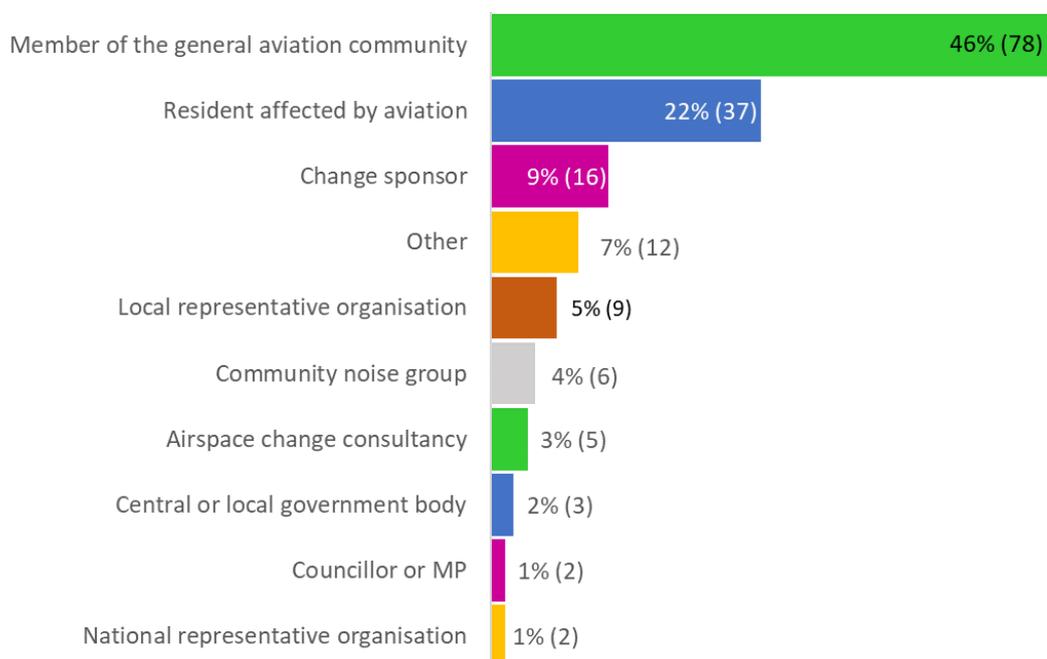
- 3.4.1 Stakeholders for the external workshops were invited based on their level of interest, knowledge, and experience of the CAP1616 airspace change process. A total of 40 external stakeholders took part in five workshops that were conducted between 15 September and 1 October 2021.
- 3.4.2 Stakeholders were grouped into categories and the workshops arranged as follows:
- **Workshop 1 (15 September 2021):** Consisted of organisations representing general aviation and airfield operations at national level. Six out of the ten invited stakeholders attended.
 - **Workshop 2 (17 September 2021):** Consisted of organisations representing communities and noise groups. Six out of the ten invited stakeholders attended.
 - **Workshop 3 (27 September 2021):** Consisted of organisations representing airports, Ministry of Defence, air navigation service providers, approved procedure design organisations, aviation consultancy firms and spaceports. Ten out of the fifteen invited stakeholders attended.
 - **Workshop 4 (29 September 2021):** Consisted of organisations representing airports, approved procedure design organisations, aviation consultancy firms and spaceports. Nine out of the twelve invited stakeholders attended.
 - **Workshop 5 (1 October 2021):** Consisted of temporary airspace change sponsors, who were mostly drone/Unmanned Aerial Systems related sponsors. A defence contractor was also invited. Nine out of the twelve invited stakeholders attended.
- 3.4.3 Each workshop was conducted remotely (via Microsoft Teams) and lasted for 2 hours and 45 minutes. They were facilitated by the CAA's Airspace Stakeholder Engagement Manager. A brief introduction was provided ahead of an open discussion on the regulatory process for permanent and temporary airspace change proposals, as well as airspace trials. Anonymous quick polls were used at various points in discussions across all groups to obtain quantitative data. Where relevant, results from the quick polls will be presented alongside findings from external workshops.

- 3.4.4 Analysis of workshop feedback led to the identification of several key themes, which formed the basis for some of the questions on the engagement survey.

3.5 Engagement Survey

- 3.5.1 Key feedback themes from the internal and external workshops were used to develop an engagement survey. In addition, views were proactively sought on any other aspect of the CAP1616 airspace change process that stakeholders identified as relevant for the review.
- 3.5.2 The engagement survey was published on the CAA's Citizen Space engagement platform and promoted to encourage maximum participation. It ran for a 30-day period in November 2021, between 1 November 2021- 30 November 2021 with a total of 170 stakeholders responding.
- 3.5.3 Respondents were asked in what capacity they were completing the survey. Depending on how they responded, they were asked to elaborate. Fig. 1 below shows how people responded overall to this question.

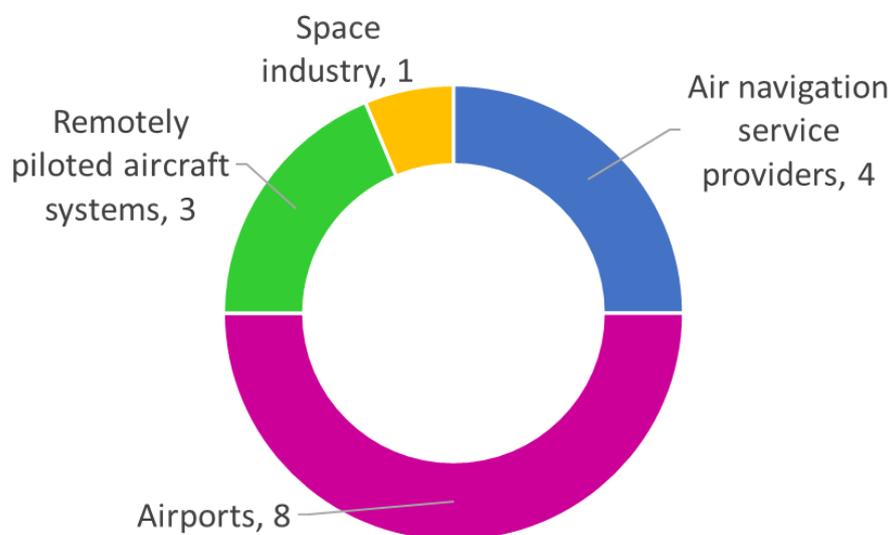
Fig. 1 Are you responding as? (Percent and number)



The chart above (Fig.1) shows that over four out of ten (46%) respondents identified as members of the general aviation community, whilst over a fifth (22%) of respondents said they were a resident affected by aviation. Politicians (councillors or MPs) represented just 1% of all respondents, as did national representative organisations.

Fig. 2 What type of sponsor are you (Number)

Respondents who identified as change sponsor were asked what kind of sponsor they were. The breakdown of sponsor type is represented in the chart opposite (Fig. 2). It shows that although most sponsors identified as airports or air navigation service providers, new entrants (space and remotely piloted aircraft systems) were represented.



Other (specified)	Count
Airport Operator	1
(not stated)	2
Airline	1
Airport not built yet	1
As a local resident and a representative on the Heathrow Community Noise Forum on behalf of Elmbridge Council	1
Council Member of AEF and Aviation Representative of CPRE Hampshire	1
Other: Drone pilot	1
Heritage attraction business	1
Other: Media Rep of a drone development company	1
Sensor Infrastructure Provider	1
Several of these categories apply	1
Total	12

Table 1

The table above (Table 1) shows the breakdown of responses for the 12 people who answered 'other'. Two did not specify who they were, while the remainder elaborated further.

3.6 Communication for Engagement Survey

3.6.1 Communications were developed to promote the engagement survey and maximise participation:

- **Emails:** An email was distributed to the 1,260 'organisations and individuals that we know have an interest in airspace change'. The list included representatives from airports, airlines, air navigation service providers, community groups, general aviation and environmental groups. Reminder notifications were distributed at the midpoint of the engagement period.
- **Skywise:** Skywise is the CAA's news bulletin, subscribed to by 16,427 stakeholders. The bulletin contains up-to-date information about safety alerts, consultations, rule changes and more. All subscribers were notified about the engagement survey through this bulletin.
- **Social media:** The engagement survey was promoted on both the CAA's Twitter and LinkedIn channels. Posts were published at the start and end of the 28-day period on both channels.
- **Press release:** A related press release was published to support the launch of the engagement survey.
- **Web pages:** A dedicated webpage⁶ was produced for stakeholders to keep abreast of all activities related to the review.

⁶ www.caa.co.uk/Review-of-CAP-1616

4. Your feedback (we heard)

4.1 Identification of key themes

4.1.1 Several key themes have emerged from engagement feedback on the review. These are:

- Process
- Document Structure
- Stages / Steps / Gateways
- Clarity / Guidance
- Scalability
- Engagement, communication and information
- Public Evidence Sessions
- Temporary Airspace Change Proposals

4.1.2 A description of each key theme, alongside summary feedback is presented below. Feedback is presented in chronological order. ACOG feedback is provided first where relevant, followed by internal and external workshops. Finally, the results from the engagement survey are presented.

4.2 Process

ACOG Feedback

4.2.1 No lessons were identified in the ACOG report in relation to this theme.

Workshop Feedback

4.2.2 Some change sponsors and aviation consultancy firms reflected that the CAP1616 airspace change process represented a disproportionate regulatory process that stifled good ideas. It was perceived as a lengthy and complex process to understand and explain. It was also seen as cumbersome for sponsors that must apply it, as well as those stakeholders affected by it. This aligns with feedback from community representatives, who suggested that it was a regulatory process that was difficult to understand and remain engaged with, and that it alienated stakeholders more than it engaged them.

4.2.3 The CAP1616 airspace change process was also seen as an expensive and resource intensive regulatory process. Some change sponsors reflected that

they required the support of external consultancy firms for their expertise and project management resource.

- 4.2.4 Change sponsors and aviation consultancy firms spoke about the adequacy of the CAP1616 airspace change process for different types of proposal. Some suggested that it was adequate for single airspace change proposals. This view was countered by others who stated that one model is not suitable for the wide variety (or types) of proposals that fall within scope of the CAP1616 airspace change process.
- 4.2.5 It was suggested that CAP1616 lacked sufficient detail on the regulatory requirements regarding the progression of major programmes of airspace re-design involving multiple interdependent airspace change proposals (such as the Airspace Change Masterplan programme, or Free Route Airspace [FRA]).
- 4.2.6 Some change sponsors and aviation consultancy firms suggested that there was a need for the CAA to provide more clarity and certainty, and that it should be more confident in its regulatory oversight approach. When sought, advice and guidance from the CAA was seen as caveated to avoid regulatory capture. On the need for the CAA to provide more definitive guidance, it was requested that this should not be translated as more regulatory requirements by the CAA.
- 4.2.7 While the greater level of transparency provided through the CAP1616 airspace change process was regarded as a positive step, some change sponsors felt that this had also introduced complication for some participants. By enhancing the level of transparency and placing a requirement on change sponsors to publish key outputs on the airspace change portal, it was felt that this had enabled stakeholders to seek greater involvement in influencing the content of some of these outputs. These concerns centred on those outputs where there was no specific requirement for change sponsors to engage stakeholders at that point in the airspace change process (for example, the content of the Statement of Need). This is countered by the views of some national representative organisations and community representatives who felt they should have the ability to influence these types of outputs.
- 4.2.8 While the airspace change portal was seen as a positive step towards enhancing the level of transparency of the airspace change process, some national aviation representative organisations suggested that the CAA should continue to explore opportunities to enhance the functionality of it.

Engagement Survey Feedback

- 4.2.9 Although a specific question was not asked about 'process', the theme was broadly reflected in the open text responses, with stakeholders voicing their concerns with the process in a similar way to workshop participants. Some change sponsors found the process both complex and unclear on certain aspects. The general aviation and community groups often voiced that they

struggled to make sense of it and how they could meaningfully contribute/influence on such a complex process:

“Process is far too complex and Sponsors are expected to be “instant experts” on the subject. Much more guidance should be given by the CAA as they are the SMEs [Subject Matter Experts]” Air Navigation Service Provider

“It is totally confusing and complex to prevent residents from having a voice” Resident affected by aviation

- 4.2.10 Some stakeholders took issue with the length of the stages and the process overall. Conversely, some felt that some parts of the process were rushed and did not give enough time for meaningful engagement:

“It also forces stakeholders into making hurried comment because adequate time has not been given...” Member of the general aviation community

- 4.2.11 As above, a range of stakeholders called for greater transparency and involvement in decision making during the process. The airspace change portal was seen both as a hindrance and an enabler to improved transparency of the process.

“In our view there needs to be stakeholder input to the CAA review of the Statement of Need before it’s finally agreed to ensure that there’s a common understanding of the objectives of the ACP [airspace change proposal].” Member of the general aviation community

“All documents available are being shared on the portal. The question for stakeholders potentially should be whether there is too much information to enable them to filter to the key documents?” Change Sponsor- Airport

- 4.2.12 Some felt that the process benefitted certain stakeholders more than others. In particular, that some change sponsors with greater resource (expertise, money) were seen as benefitting the most. Others felt that the airspace change process disadvantaged certain airspace users/new entrants (Unmanned Aerial Systems and space operators). Some respondents remarked that the CAA could act more independently in decision-making.

“The process is too complex and resource heavy which makes it prohibitively expensive; this does not encourage minor airports to submit changes...” Change Sponsor- Airport

“The process seems to have been principally developed for local airspace changes for commercial aviation/airports that does not readily lend itself to progress new technologies e.g. UAS/UAM/AAM [Unmanned Aerial Systems,

Urban Air Mobility/Advanced Air Mobility]” Sponsor- Remotely Piloted Aircraft System

CAA response on Process:

We will consider options to address the feedback linked to this theme by:

- Using more accessible language where possible.
- Reducing the overall complexity of the process.
- Making the process inclusive of new airspace entrants, without placing further complexity on the process.
- Considering our role as regulator in providing guidance and support to sponsors and other stakeholders.
- Improving the functionality of the portal, to benefit both sponsors and other stakeholders.

4.3 Document structure

ACOG Feedback

4.3.1 No lessons were identified in the ACOG report in relation to this theme.

Workshop Feedback

- 4.3.2 Internal and external stakeholders (change sponsors and aviation consultancy firms) suggested that there was a need to provide clearer separation within CAP1616 between the regulatory requirements and the guidance provided in relation to them. They observed that there was an overlap between the two when comparing the content of the main text with that contained in the appendices. Repetition and inconsistency were often cited as a cause of confusion for the reader. It was suggested that the structure of the document could be improved through better use of the main body to focus specifically on the regulatory requirements (i.e. the things that ‘must’ be done) and the appendices for related guidance (i.e. how they ‘could’ or ‘should’ be done).
- 4.3.3 There was also a feeling that CAP1616 is very fragmented, which pushes the reader to ‘jump’ from one part to the other, and in some cases to separate publications. This has also caused confusion for the reader, so stakeholders felt this should be addressed accordingly.
- 4.3.4 The overlap between the content of some CAA Policy Statements and CAP1616 was highlighted and discussed. It was suggested that CAP1616 should be the sole CAA publication used to cover the regulatory requirements for the various

types of airspace change. It was felt that this could be achieved through the introduction of self-contained sections within it, allowing the reader to focus solely on the section that is relevant to their type of airspace change proposal.

Engagement Survey Feedback

4.3.5 There was no specific theme for document structure in the survey. However, comments about how easy the document was to follow were made by stakeholders under the survey questions about scalability and clarity of the document.

CAA response on Document Structure:

We will consider options to address the feedback linked to this theme by:

- Recognising the need for a clear distinction between the regulatory requirements and related guidance.
- Removing inconsistencies, reducing repetition, and minimising fragmentation in the revised version of CAP 1616.
- Continuing to listen to stakeholders on their preferences and suggestions on this topic as part of the review.

4.4 Stages / Steps / Gateways

ACOG Feedback

4.4.1 No lessons were identified in the ACOG report in relation to this theme.

Workshop Feedback

4.4.2 Feedback from internal and external stakeholders (change sponsors and aviation consultancy firms) suggested that there are opportunities to simplify the airspace change process by combining or removing some of the stages/steps. This was caveated by the view that stages/steps/gateways shouldn't be changed dramatically. Some change sponsors expressed caution, querying the potential impact any such changes could have on 'in progress' airspace change proposals.

4.4.3 In terms of combining or removing stages/steps, the following list details all the suggestions that were specifically made during both the internal and external workshops:

- **Combine Stage 1 (DEFINE) with Stage 2 (DEVELOP & ASSESS)** and have a single Gateway.
- **Combine Step 2A (Options development) with Step 2B (Options appraisal)** making it simply Stage 2. It was recognised that Stage 2 represented a complex part of the CAP1616 airspace change process

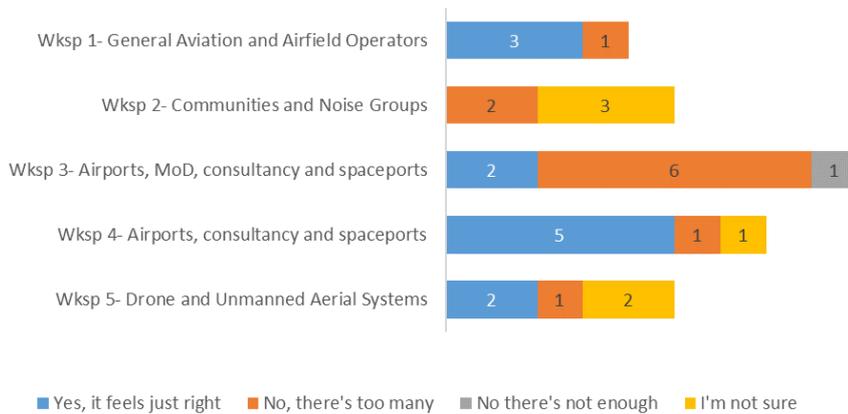
and that the way in which it had been presented had caused confusion. The suggestion to combine the sub-steps into a single stage was made on the basis that it could help to make it more logical and therefore easier to understand and apply.

- **Remove Step 3B (Consultation approval).** CAP1616 summarises this Step as the point at which the CAA “*gives its approval that the consultation strategy and documents meet the requirements for an open, fair and transparent consultation*”. This activity is completed by the CAA at the Stage 3 (CONSULT) Gateway and therefore the suggestion to remove Step 3B from CAP1616 was based on it being a duplication of activity.
- **Remove Step 3D (Collate & review responses).** The overlap between Step 3D and Step 4A (Update design) was discussed and it was noted that this had caused confusion for stakeholders. Each Step requires separate, but very closely related outputs to be produced by the change sponsor. At Step 3D change sponsors are required to categorise consultation responses in accordance with specific CAP1616 requirements and publish this output. This analysis supports the development of the consultation response document, which must be published at Step 4A. It was suggested that the CAP1616 airspace change process could be simplified and streamlined by removing Step 3D and placing a requirement on change sponsors to publish a single output (consultation response document) at Step 4A. So as not to lose the requirements of Step 3D, it was suggested that the consultation response document should detail the change sponsor’s chosen methodology for categorising consultation responses and that the CAA should be required to review this output prior to the change sponsor progressing to Step 4B (Submit proposal to CAA).
- **Gateway Flexibility:** With regards to the management and application of the DEFINE (Stage 1), DEVELOP & ASSESS (Stage 2) and CONSULT (Stage 3) gateways, change sponsors and aviation consultancy firms requested more frequent gateway meetings on the basis that they are currently used as a single, monthly opportunity for a change sponsor to progress onto the next Stage. It was suggested that more frequent gateway meetings could address some of the concerns related to the CAP1616 airspace change process being lengthy and expensive.
- **Stage 5 (DECIDE) Timescales:** Change sponsors and aviation consultancy firms suggested that it was difficult for them to plan effectively, citing concerns in the CAA’s ability to meet agreed timescales for the completion of Stage 5 (DECIDE). The multiple

actions that need to be completed, the order in which they need to be done and related dependencies were also discussed.

4.4.4 During the workshops, quick polls were utilised to capture feedback on the number of stages/steps/gateways. The charts below (Figs. 3 & 4) provide a breakdown of responses to poll questions about stages/steps/gateways and specifically about the temporary airspace change process.

Fig. 3 Are the number of stages, steps and gateways in the process appropriate?

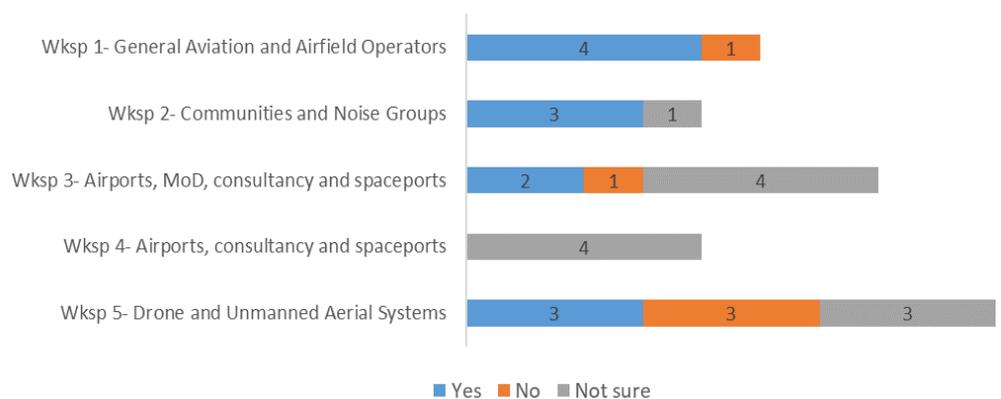


The chart opposite shows that overall, there was an almost even split between those respondents who felt the number of stages/steps/gateways was 'just right' (12), compared with those that felt there were 'too many' (11). Overall, six respondents said that they were not sure to this question.

4.4.5 The CAA also sought feedback on the potential introduction of a pre-engagement gateway to the regulatory process for temporary airspace changes and airspace trials:

Whilst the results displayed opposite (Fig. 4) suggest some stakeholders felt that this would enhance the regulatory process for temporary airspace changes and airspace trials, an equal number weren't sure. Three out of nine poll respondents from Workshop 5 (Drones and Unmanned Aerial Systems) felt that there should not be a gateway.

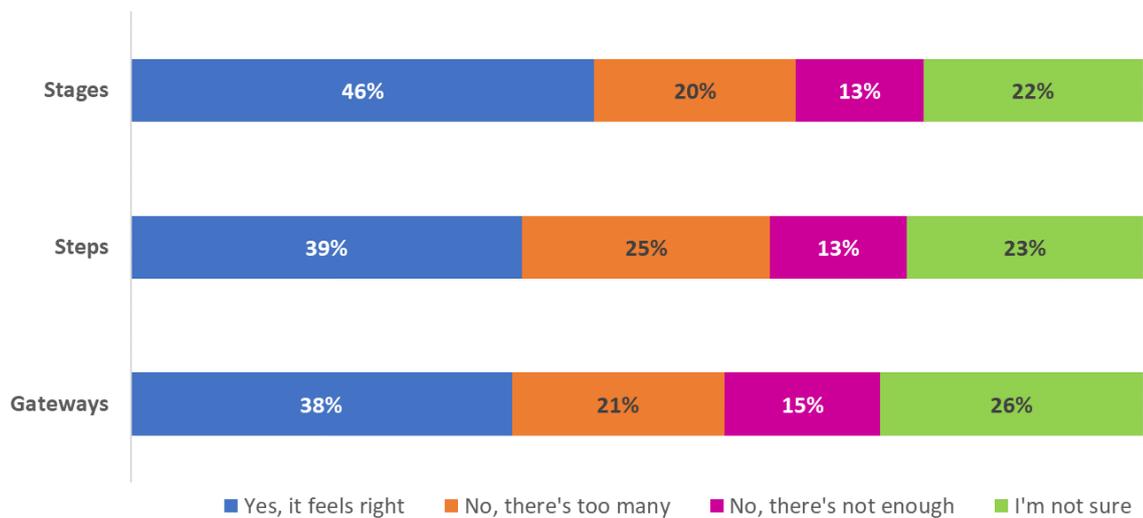
Fig. 4 Should we provide a formal gateway for temporary airspace change/trials in advance of targeted engagement/consultation commencing?



Engagement Survey Feedback

4.4.6 The chart below (Fig. 5) suggests that around four in ten respondents felt that the current requirements were appropriate. A proportion felt that there were either too many stages/steps/gateways or not enough of them. About a quarter of respondents stated they weren't sure, and this may be representative of the fact that some stakeholders have not been exposed to the entire CAP1616 airspace change process.

Fig. 5 Do you think the number of stages/steps/gateways is appropriate? (percent)



4.4.7 The charts (Figs. 6, 7 and 8) below show how respondents answered the question about the appropriateness of stages/steps/gateways by broad stakeholder group.

Fig. 6 Do you think the number of stages is appropriate (Respondent type/number)

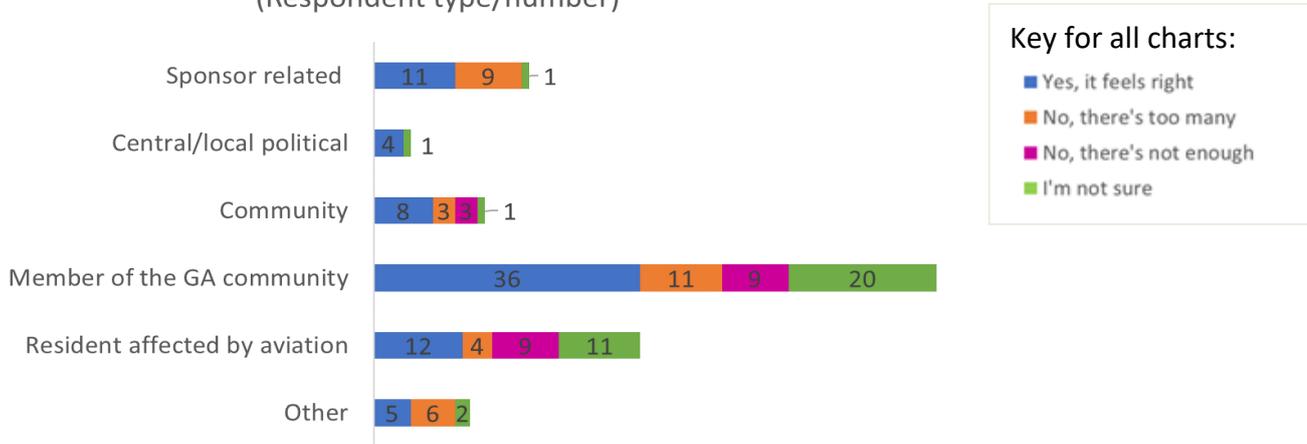
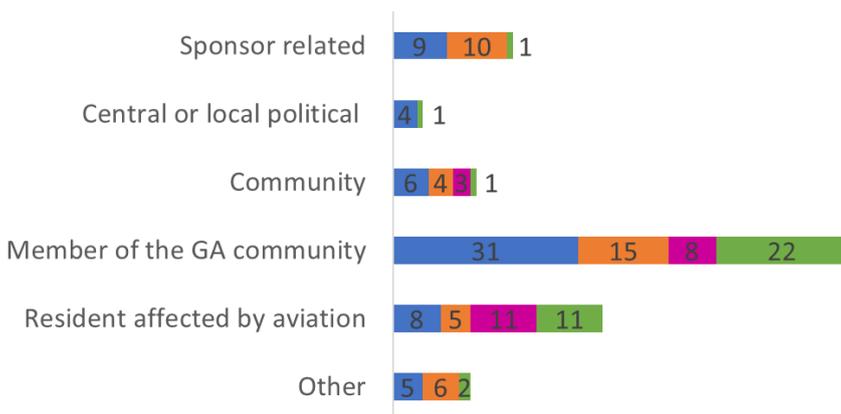


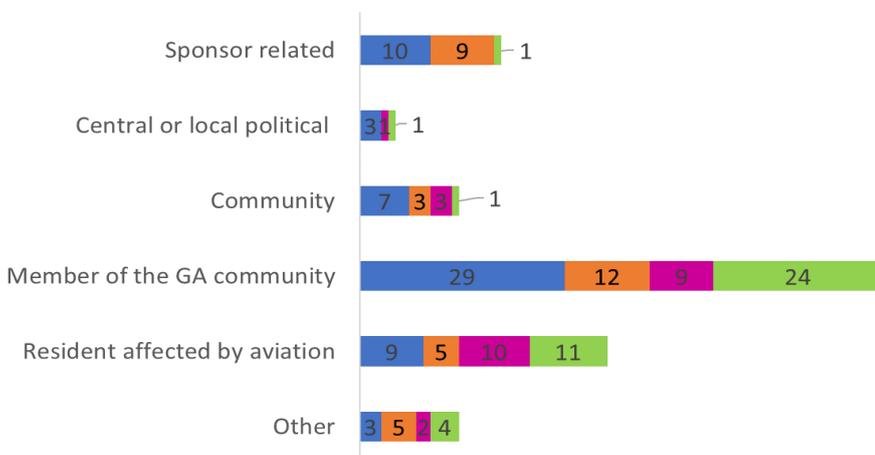
Fig. 7 Do you think the number of steps is appropriate (Respondent type/number)



Proportionally, around half of sponsor related stakeholders felt the number of steps/stages/gateways is about right.

Those who felt that there were not enough stages/steps/gateways came primarily from the general aviation/community/residents affected by aviation categories. Similarly, those who felt unsure if there were enough stages/steps/gateways were mostly from the general aviation community or residents affected by aviation.

Do you think the number of gateways is appropriate (Respondent type/number)



- 4.4.8 Qualitative data from the survey revealed further insight into why respondents responded in the manner they did. Different stakeholders saw the number of stages/steps/gateways as both a hindrance to progress and a way of providing increased scrutiny. Some sponsors often cited the process as unduly lengthy, leading to growing resource costs. Other sponsors felt that the length of the process was only appealing to conventional airspace change sponsors:

“Concerns about the resourcing and complexity of multiple dependent ACPs being processed in parallel.” [Airline](#)

“The process seems to have been principally developed for local airspace changes for commercial aviation/airports that does not readily lend itself to progress new technologies e.g. UAS/UAM/AAM” [Sponsor- Unmanned Aircraft System](#)

- 4.4.9 Both general aviation and community representatives wanted to see an increase of involvement or engagement at various stages of the process:

“Not enough emphasis is placed on truly listening to the public and acting on their concerns, particularly the overflow. The consultation elements are pure window-dressing rather than engaging those most disadvantaged by aircraft noise and pollution.” [Resident affected by aviation](#)

- 4.4.10 The complexity of the stages/steps/gateways was cited as particularly difficult to understand from both the general aviation community and from those affected communities on the ground. Many of these stakeholders were unable to provide appropriate resource (time, people) to follow and understand the process and a sponsor’s actions within it. As a result, they often felt less able to challenge a proposal.

“The whole procedure is very time-consuming for an observer/interested party such as a GA pilot to follow diligently.” [A Member of the general aviation community](#)

CAA response on Stages / Steps / Gateways:

We will consider options to address the feedback linked to this theme by:

- Reviewing the number of stages, steps and gateways, and the purpose of each of them.
- Considering what options are available to simplify the process, remove confusion and make it easier to understand / follow.

We understand that some stakeholders will want to know how potential modifications to the number of stages, steps and gateways may impact ‘in progress’ airspace change proposals. Any transition arrangements proposed will be developed and presented to all stakeholders as part of the consultation process.

4.5 Clarity / Guidance

ACOG Feedback

- 4.5.1 ACOG noted that sponsors were unclear where the CAP1616 process lay in a complex aviation regulation and policy landscape. It suggested that the CAA should consider offering additional information on the wider policy context and how CAP1616 interacts with it.
- 4.5.2 ACOG also noted that roles and responsibilities of the regulators working on airspace change proposals were not clearly defined or commonly understood by sponsors. ACOG recommended that the CAA should consider offering additional information on the responsibilities of the various regulatory roles that support the process and the nature of advice and guidance it was appropriate for them to provide.
- 4.5.3 ACOG reported that sponsors were unclear on what information should be included when developing a baseline (Stage 2). Specifically, they noted sponsors felt uncertain on the time-period that they should refer to and the point at which it should be established. ACOG also noted that change sponsors were applying different approaches to updating the baseline; and how they make comparisons between their design options. ACOG suggested that the CAA should develop additional advice on the treatment of the baseline. This should include time-period(s) the baseline should refer to and the approach to updating it over time.
- 4.5.4 With regards to design options, ACOG reflected that a definition of what should be included on the comprehensive list was lacking and existing advice was ambiguous. They also reflected the resource-intensive nature of developing a complex long list of options. It was suggested that the methodology, criteria, and evidence used to shortlist design options were vague and therefore applied inconsistently. ACOG identified the need for a solution to the issue of new options arising in latter stages. This is a pertinent issue for the Airspace Change Masterplan programme given the degree of interdependency between options as designs are developed. ACOG recommended that the CAA should develop additional advice on the definition of the design options in the comprehensive list and the methodology for shortlisting design options.
- 4.5.5 In their recommendations, ACOG suggested that sponsors would like further guidance on the best way to treat the preferred design option as it moves from the initial to full options appraisal.

Workshop Feedback

- 4.5.6 National aviation representative organisations, change sponsors and aviation consultancy firms felt that greater clarity could be provided in terms of the roles and responsibilities of the key participants involved in the airspace change process. Change sponsors and aviation consultancy firms suggested that they should better reflect the CAA's willingness to provide advice and guidance on regulatory requirements to all stakeholders throughout the airspace change process, while also clearly detailing what is expected from all the key participants.
- 4.5.7 Similar views were expressed with regards to the presentation of relevant legislation, guidance, and policy. Change sponsors felt that CAP1616 should clearly explain the legal framework relevant to the airspace change process, and how this is applied accordingly throughout it.
- 4.5.8 Focussing on Stage 1 and the submission of the Statement of Need (Step 1A), national aviation representative organisations felt that there was a need to reinforce the importance of this output. While it was noted that change sponsors are required to explain the current/existing situation and issues or opportunity to be addressed, it was suggested that they should also be required to clearly articulate their overarching objective(s) for pursuing an airspace change within the Statement of Need.
- 4.5.9 With regards to the requirement for the CAA to assign a provisional scaling level at the Assessment Meeting (Step 1A), internal and external stakeholders (change sponsors and aviation consultancy firms) felt that there was a need to re-consider the way in which the levels were defined and/or consider adding more.
- 4.5.10 On the need to develop design principles (Step 1B), community representatives suggested that they were too theoretical, which made it difficult for stakeholders to understand the purpose and relevance of them. They asked whether it would be possible for change sponsors to provide more context against each design principle to explain their purpose and how they were likely to influence the development of the design options in subsequent stages of the airspace change process.
- 4.5.11 Change sponsors and aviation consultancy firms highlighted that they had developed several design principles since the implementation of CAP1616. They suggested that they should be allowed to maintain a standardised longlist of design principles and apply them accordingly when progressing an airspace change proposal.
- 4.5.12 It was also suggested that better use could be made of Appendix D by enhancing the level of guidance provided on how to develop effective and measurable design principles, perhaps using examples to demonstrate what good looks like.

- 4.5.13 On Stage 2, change sponsors and aviation consultancy firms requested greater clarity by defining some of the key terms introduced at this part of the CAP1616 airspace change process. It was felt that there was a need to define what represents a 'design option' as they observed that this was often interpreted in different ways. It was also suggested that CAP1616 needed to clarify what was expected in terms of the requirement to develop a 'comprehensive list of options' as it was not clear what design options should be included on it.
- 4.5.14 Greater clarity was also requested with regards to defining the 'baseline' and how it must be used to support the options appraisal process. It was suggested that the CAP1616 airspace change process could be enhanced by providing clearer requirements on how the baseline must be presented, while also being more explicit in terms of when and how the 'do nothing' and/or 'do minimum' baseline options should be used. The importance of the baseline was highlighted in that it provides the foundation to support the development of the options appraisal. On this basis, change sponsors and aviation consultancy firms suggested that CAP1616 should make allowances for the baseline to be discussed and agreed with the CAA prior to the options appraisal being completed.
- 4.5.15 Confusion was expressed regarding the process of evolution from a comprehensive list of design options to a list of viable design options and subsequently onto a final shortlist of design options. More clarity was requested on this process of evolution, particularly with regards to the 'clear list of criteria' and 'high level exercise' referenced in Appendix E of CAP1616.
- 4.5.16 With regards to the need to complete a Design Principle Evaluation (Step 2A), change sponsors and aviation consultancy firms suggested that the proforma contained in Appendix E was complex and difficult for stakeholders to understand. The CAA was encouraged not to be so prescriptive in requiring the use of this format.
- 4.5.17 Change sponsors, aviation consultancy firms and community representatives requested more clarity on the requirement to acknowledge and explain the potential cumulative impact(s) when progressing major programmes of airspace re-design that involve multiple interdependent airspace change proposals. This is aligned with feedback received against the 'process' theme, where similar stakeholders suggested that CAP1616 was only suitable for single airspace change proposals being progressed in isolation.
- 4.5.18 With regards to consultation preparation (Step 3A), it was recognised that there was a diverse range of requirements when considering the varying needs of stakeholders that are affected by and/or have an interest in the airspace change process. The CAA was encouraged to provide more guidance on how to balance the various, and sometimes competing, needs of such a diverse range of stakeholders.

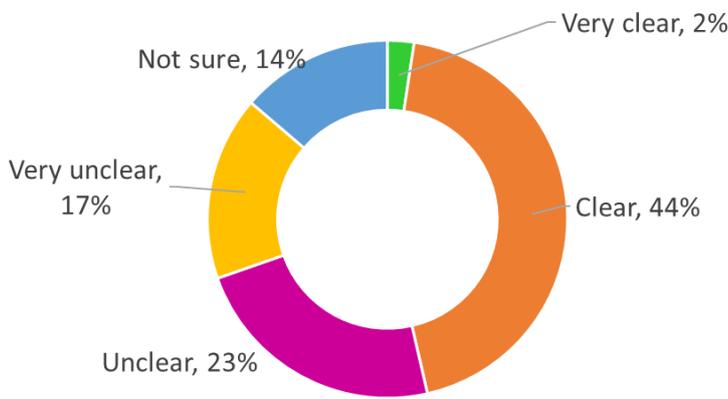
- 4.5.19 The DEFINE (Stage 1), DEVELOP & ASSESS (Stage 2) and CONSULT (Stage 3) Gateways were discussed, and concerns were expressed by some change sponsors and aviation consultancy firms who reported that the CAA had adopted an varying approach when engaging with them at this point in the airspace change process. It was felt that further clarity would be useful regarding the potential actions that could be taken by the CAA in terms of seeking more information and/or clarity from the change sponsor. Gateway submissions and assessment timelines were also raised as points that needed to be clarified.
- 4.5.20 Remaining on Gateways, change sponsors and aviation consultancy firms suggested that the CAP1616 airspace change process should make allowances for them to request a pre-submission meeting with the CAA. This was made on the basis that it would provide them with an opportunity to present their submission and seek initial feedback from the CAA on the suitability of it.
- 4.5.21 The possibility of updating the proposal (Step 4A) through the addition of new and/or reintroduction of previously discounted design options post-consultation was discussed. Greater clarity was requested on the consequential impact of doing this. It was also highlighted that CAP1616 does not make it clear to what extent modifications could be made to design options without having to revisit a previously completed stage or step of the CAP1616 airspace change process.
- 4.5.22 It was suggested that the multiple, and in some cases parallel, activities that need to be completed at Decide (Stage 5) had caused confusion. More clarity was required in terms of the dependencies that exist between the required actions at Stage 5, for example the relationship between the completion of the document check and the opening of the Secretary of State Call-In window.
- 4.5.23 With regards to Implement (Stage 6) and the Post Implementation Review (Stage 7), change sponsors and aviation consultancy forms suggested that there was a need for further clarity on the regulatory requirements in CAP1616.
- 4.5.24 In terms of outputs, confusion was expressed regarding those which must be uploaded to the Airspace Change Portal to satisfy the transparency requirements of the CAP1616 airspace change process and those submitted directly to the CAA to support their regulatory assessment work. It was suggested that clarification should be provided on the latter, particularly with regards to the level and content of supporting evidence that is required by the CAA for it to make a regulatory decision, either at each of the Gateways or at Stage 5 (DECIDE).
- 4.5.25 A key and consistent message linked to the 'clarity' theme was the need for CAP1616 to provide clear separation between what must be done to satisfy the regulatory requirements of the airspace change process against the related guidance which details how this could or should be achieved. On this point, specific discrepancies between the content of the main body in comparison with the content of the appendices were cited by both internal and external stakeholders, who observed that this caused confusion for the reader.

4.5.26 Finally, change sponsors and aviation consultancy firms also felt that greater clarification could be provided through better use of case studies and best practice examples that would demonstrate how to apply the regulatory requirements of CAP1616 and demonstrate compliance with it.

Engagement Survey Feedback

4.5.27 The engagement survey sought feedback from stakeholders on the clarity provided within CAP1616 on the CAA’s regulatory requirements.

Fig.9 How clear is CAP1616 at specifying what the CAA's regulatory requirements are? (percent)



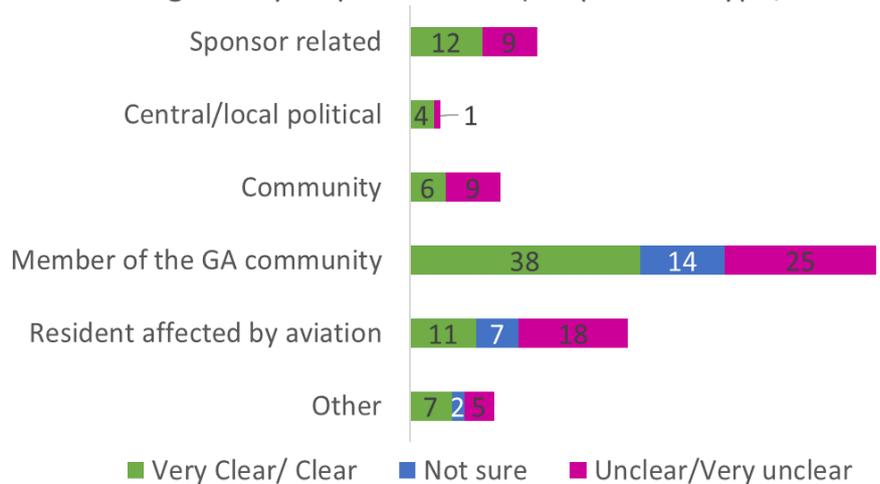
The chart opposite (Fig. 9) shows that just under half (46%) of respondents felt that the CAP1616 airspace change process was ‘very clear’ or ‘clear’. However 40% felt that it was ‘very unclear’ or ‘unclear’.

The chart opposite (Fig.10) shows the same responses by stakeholder. Numbers have been used instead of percentages. Most respondents who identified as sponsors found the document clear (12), but a good proportion did not (9).

Residents affected by aviation had the lowest proportion of respondents who felt the guidance was either ‘very clear or clear’ (11).

Both the general aviation (14) community and residents affected by aviation (7) had the greater number of respondents who were unsure of the document’s clarity.

Fig.10 How clear is CAP1616 at specifying what the CAA regulatory requirements? (Respondent type/number)



- 4.5.28 Respondents elaborated on their answers to the question about clarity of the CAP1616 guidance in the open text question. Generally, survey comments on this theme mirrored workshop feedback. Respondents discussed the need to be clearer on what is mandatory, recommended, or optional. They reflected that the language in CAP1616 does not allow for easy distinction between these things and suggested this led to an inconsistent approach by sponsors and regulators:

“As a minimum, the uses of “should”/“shall”/“must”/“may” etc need to be reviewed so that existing conflicts and ambiguities are removed.”

Sponsor

“The document is complex and, as a result, the regulatory requirements are not clear. It is also not clear what criteria will be used to decide whether regulatory requirements have been complied with.”

Community Noise Group

“The process is open to subjective interpretation by both the sponsor (or their aviation consultant) and the CAA gateway review teams”

Airspace change consultancy

- 4.5.29 Many respondents wanted to see the role of the process and the CAA regulators realigned to be more objective to the views of all stakeholders. Some stakeholders felt the process was exclusively for sponsors and was most beneficial to them, making it difficult for other stakeholders to input or engage with. Others felt the CAA were not objective and consistent enough at gateway assessments.

“...While the guidance is clear to those who work within the aviation industry, airspace changes are by their very nature complex and can be confusing to local stakeholders.”

Sponsor- Airport

“The CAA is very conflicted”

Community Noise Group

- 4.5.30 Touched on above, even though the content was complex, some sponsors perceived it as helpful and clear for sponsors. For them, the process seemed to set out the legal and technical context for the airspace change process well. For other stakeholders, the same legal and technical context was perceived as a means of obfuscating the process, making it difficult to understand and follow:

“CAP 1616 is fairly clear on what the CAA regulatory requirements are, this is improving with revised guidance”

Councillor

“Whilst the embedded links to other technical or legal documents in the CAP 1616 document are useful, it is very off-putting for any lay person to get to grips with.”

Local Authority

- 4.5.31 All stakeholders wished to see clearer, updated guidance on environmental requirements within the airspace change process. Most stakeholders expressed a desire to see a set of environmental requirements that were ‘future proofed’. That is, a set of requirements that allowed tailoring of regulation considering current context alongside emerging policy conversations:

“Whatever set of noise metrics the CAA decides to have...a scheme proposer can go beyond what is required if understanding is enhanced for the public and that should be decided on a case by case basis reflecting the sensitivity/circumstances.” Resident affected by aviation

CAA response on Clarity / Guidance:

We will consider options to address the feedback linked to this theme by:

- Recognising the need for a clear distinction between the regulatory requirements and related guidance.
- Removing inconsistencies, reducing repetition, and minimising fragmentation in the revised version of CAP 1616.
- Providing additional clarity and guidance where possible.

4.6 Scalability

ACOG Feedback

- 4.6.1 ACOG reported that the approach required by change sponsors to conduct stakeholder engagement was perceived to be disproportionate, especially in the early stages of the airspace change process. Their report suggested that engagement/consultation fatigue (with stakeholders) was linked to the extended nature of the process. ACOG suggested that practical advice and methods should be developed to help change sponsors conduct efficient, proportionate and cost-effective engagement, particularly during the early stages of the airspace change process.
- 4.6.2 ACOG noted that change sponsors were unsure about how to manage disruptive stakeholders that act intentionally to undermine the airspace change process. They recommended that the CAA should provide additional advice on how to manage any such stakeholder(s).

Workshop Feedback

- 4.6.3 Change sponsors and aviation consultancy firms felt that the scalability of the CAP1616 airspace change process was not very well defined and that it was not

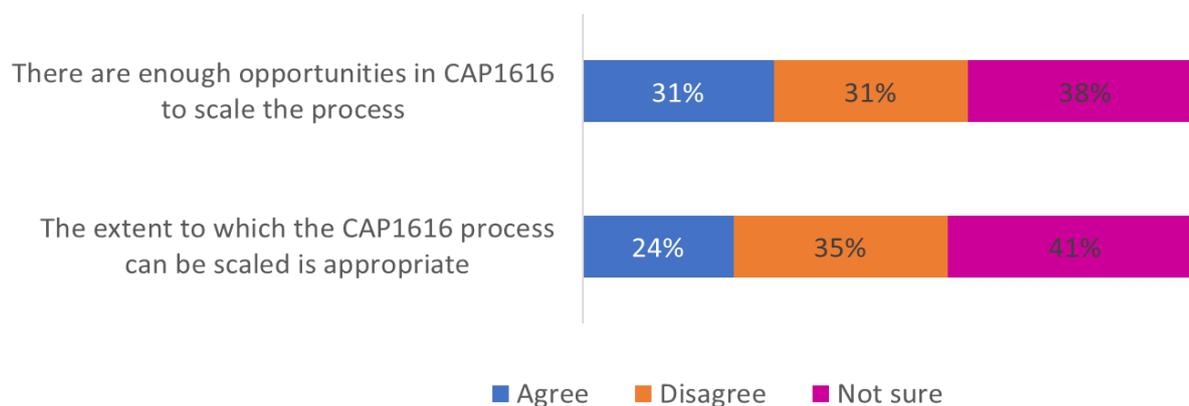
clear when and how the process could be scaled. They suggested that more guidance was required, and that better use of examples would be helpful. The provisional scaling 'levels' were also discussed, and it was observed that the process requirements seemed to be the same irrespective of the level assigned to the airspace change proposal. On that basis, the CAA was encouraged to consider re-defining the levels and/or introducing new ones to enhance the scalability and proportionality of the CAP1616 airspace change process.

- 4.6.4 Noting the requirement to assign a provisional scaling level and discuss how the process could be scaled during Step 1A, community representatives suggested that the CAA should consider the use of set criteria and/or some form of screening appraisal to help identify those airspace change proposals that were scalable.
- 4.6.5 The ability to condense the Gateway requirements through 'multi-Gateway' submissions was welcomed by change sponsors and aviation consultancy firms, and it was felt this should be better reflected in CAP1616.
- 4.6.6 The regulatory processes for temporary airspace change proposals and airspace trials was discussed and it was noted that change sponsors that wished to make these arrangements permanent were required to complete the full airspace change process. The CAA was asked to re-consider this and encouraged to look at an abridged and suitably scaled process to be applied in any such instance.

Engagement Survey Feedback

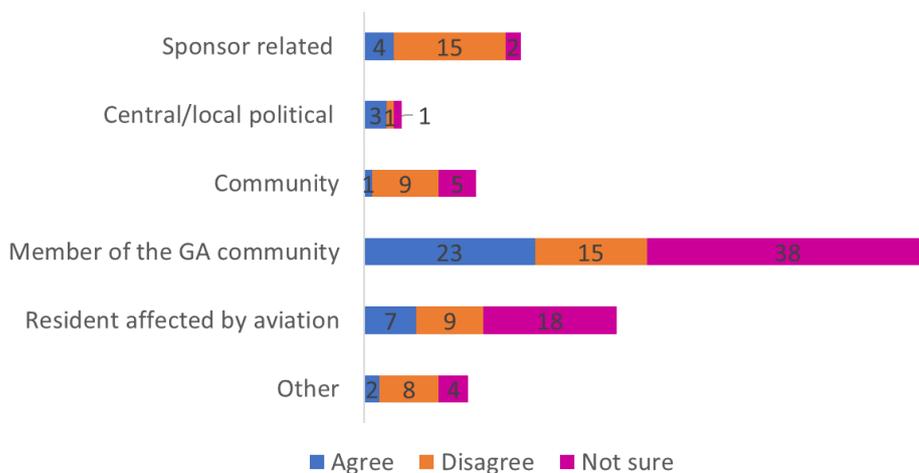
- 4.6.7 The engagement survey sought feedback on the scalability of the CAP1616 airspace change process. Respondents were presented with two statements and asked whether they agreed, disagreed or were not sure about them.
- 4.6.8 The chart below (Fig.11) shows how people responded. The first statement ("There are enough opportunities in CAP1616 to scale the progress") showed how nearly a third agreed with this statement, with another third disagreeing with it. Nearly four out of ten respondents were not sure about this statement (38%).
- 4.6.9 The second statement ("The extent to which the CAP1616 process can be scaled is appropriate") had agreement from a quarter (24%) of respondents. Just over four out of ten respondents were not sure of this statement.

Fig.11 Do you agree or disagree with the following statements about scalability in the CAP1616 process? (percent)



4.6.10 The charts in Figs.12 and 13 below show how different types of stakeholders responded to the statements above. Responses are represented in figures as numbers were too low to be meaningful as percentages.

Fig.12 The extent to which the CAP1616 process can be scaled is appropriate (Respondent type by number)



The chart opposite (Fig.12) shows that sponsors mostly disagreed with the statement that the extent to which the process can be scaled is appropriate (15 out of 21). Conversely, the general aviation community had more respondents agreeing with this statement (23 out of 76). Residents affected by aviation alongside members of the general aviation community both had the higher proportion of respondents who were not sure about this statement.

Fig.13 There are enough opportunities in the CAP1616 to scale the process (Respondent type by number)

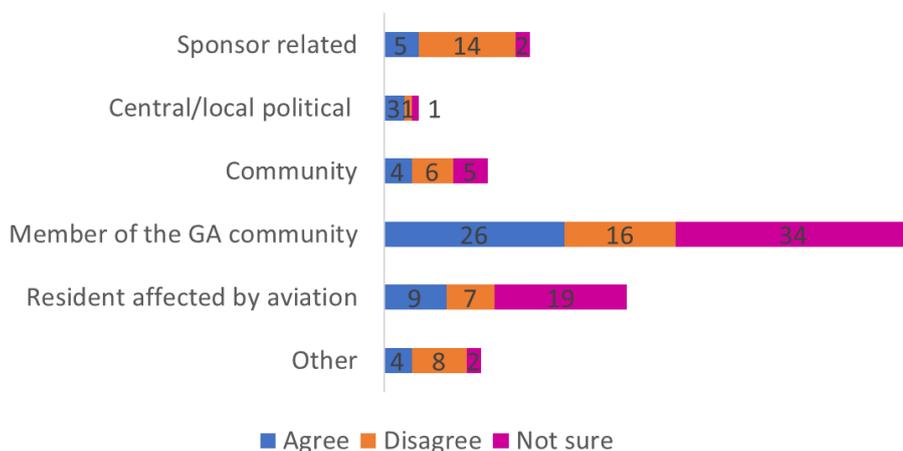


Fig.13 opposite shows how stakeholders responded to a statement about there being enough opportunities to scale in the current process. Members of the general aviation community had the highest number of respondents who agreed with this statement (26 out of 76). The highest proportion of those who were unsure about this question came from the general aviation and resident affected by aviation categories. Most respondents who were sponsors (14 out of 21) disagreed with this statement.

- 4.6.11 Open text responses to the question about scalability gave some insight into why stakeholders responded the way they did.
- 4.6.12 Sponsors stated that guidance on how to scale the process in CAP1616 was sometimes scant. They argued that flexibility should be applied to smaller scale changes. They cited resource impacts of a longer process and proposed a more proportionate approach to scaling of proposals. Other stakeholders felt that scaling could set a precedent for sponsors to make the process as lean as possible, leading to less scrutiny.

“Disagree – the process is far too complicated for minor changes. Thus, changes to established procedures can be prohibitively expensive for smaller airports; this does not encourage the modernisation of processes or systems.” Sponsor- Airport

“There needs to be clear rules regarding scalability to provide confidence in the system. Large commercial operators may try to bend things so that the process is as scaled back as possible.” Member of the general aviation community

- 4.6.13 Stakeholders did not so much focus on the number of opportunities to scale, but more so on the proportionality of scaling opportunities:

“[Redacted] welcomed the CAA’s openness to the potential for making the ACPs proportionate in scale; without this, undertaking these ACPs would not be viable.” Sponsor- Airport

“Not all Airspace Change Proposals (ACP) need to be subjected to every element in the process...the process should be flexible/scalable to address different types of ACP’s, to be cost effective.” Councillor

- 4.6.14 Stakeholders who were not sponsors spoke of the process being so complex that it was difficult to evaluate whether a sponsor had appropriately scaled the process:

“I can understand the need to have some flexibility in how minor vs major ACPs are assessed, but it is difficult to know how appropriate this is or has been without understanding the impact of some of the changes that have been made using a scaled back process.” Resident, Councillor and Representative on Community Noise Forum

- 4.6.15 Scaling on engagement and consultation activity was seen as both an opportunity for sponsors and means of less scrutiny of sponsor activity (more on feedback about engagement and consultation below).

“There should be a process whereby airspace can be handed back or downgraded to a lower classification without any requirement to consult other than to provide notification. This would enable airspace not being

used to be quickly handed back. This should be part of the scalability.”

Airspace Navigation Service Provider

- 4.6.16 Some sponsors wished to see a more proportionate approach to the environmental requirements for both the temporary and permanent processes, because of resource implications.

“For the smaller aerodrome there appears to be a lack of understanding just how small scale their operations are. This is particularly problematic when dealing with Environmental issues such as noise and CO2 emissions.” **Airspace change consultancy**

- 4.6.17 Other stakeholders felt that scaling on environmental requirements should not be an option:

“Every proposed change to the airspace that impacts residential areas should be subjected to the same levels of environmental (noise and emissions) scrutiny regardless of complexity.” **Resident affected by aviation**

- 4.6.18 New entrants to airspace such as spaceports wished to see a different model of scaling all together:

“I believe Spaceports should have their own level of scaling given the unique airspace requirements associated with vertical launch sites.” **Sponsor- Space**

CAA response on Scalability:

We will consider options to address the feedback linked to this theme by:

- Considering how scalability could be better defined to help sponsors identify which airspace change proposals are scalable.
- Reviewing the suitability of the scaling levels.
- Developing a more proportionate airspace change process that is reflective of individual airspace change proposals and their circumstances.

4.7 Engagement, Communications and Information

ACOG Feedback

4.7.1 ACOG reported that change sponsors felt that they were required to produce overly extensive records of engagement which obscured the substantive points amongst excessive detail. They acknowledged the need for change sponsors to be more astute when analysing stakeholder feedback and noted that it was sometimes not meaningful or relevant. ACOG recommended that the CAA should develop additional advice that encourages a more proportionate, pragmatic approach to evidence gathering in the early stages and efficiently filters out feedback that is clearly out of scope for an airspace change proposal.

Workshop Feedback

4.7.2 During the workshops, internal and external stakeholders raised broader observations with regards to the engagement requirements of the CAP1616 airspace change process as well as providing feedback on the engagement requirements of specific stages and steps.

4.7.3 It was noted that the CAP1616 airspace change process requires more engagement than its predecessor and concern was expressed that this has caused engagement fatigue. Stakeholders are invited to comment on multiple airspace change proposals, some of which will be very complex, particularly where there are interdependencies between neighbouring proposals. The need for the engagement requirements to be proportionate and relative to the impact of the airspace change proposal was discussed. While it was generally felt that CAP1616 provided sufficient engagement opportunities, concerns were expressed by national aviation representative organisations and community/environmental representatives over the quality of engagement undertaken by some change sponsors.

4.7.4 Transparency and trust in the process remain an issue. It was suggested that change sponsors could be “dismissive”, whilst stakeholders could be “disruptive”. The breakdown of trust and perception that solutions are often pre-determined has, in some instances, made it difficult to achieve meaningful engagement throughout the airspace change process. On this basis, change sponsors suggested that the CAA should consider introducing some form of arbitration process within CAP1616.

4.7.5 With regards to stakeholder identification and mapping, engagement at the representative level was felt to be appropriate in the early stages of the CAP1616 airspace change process. However, related concerns were expressed by some change sponsors who suggested that it encouraged disproportionate and unnecessary exchanges between change sponsor and stakeholder. Those stakeholders best placed to represent non-aviation and/or environmental interests was also discussed. The community/environmental representatives

noted that by referring to the stakeholder categories specified in CAP1616, there was the potential to exclude some representative bodies/groups that may genuinely feel they have something to contribute.

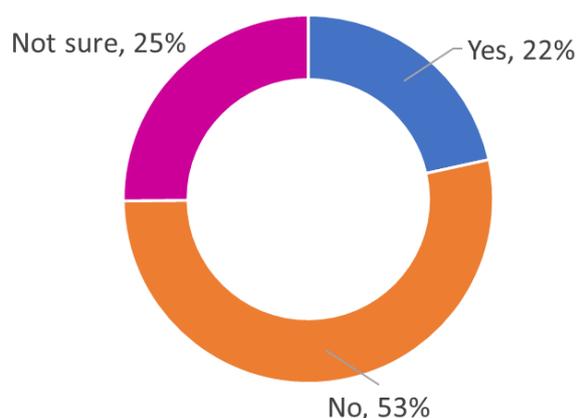
- 4.7.6 The CAA was encouraged to enhance the roles and responsibilities within CAP1616 by specifying what was expected of stakeholders. It was felt that this would be particularly useful for the national representative organisations as it was noted that there has been some inconsistency in terms of how they have engaged with the airspace change process. It was also highlighted that there tends to be an assumption that all stakeholders understand the airspace change process, but that was reported as not always being the case. Consequently, it was suggested that more should be done to help all stakeholders understand the requirements of a complex regulatory process.
- 4.7.7 In terms of engagement methodology and approach, national aviation representative organisations reinforced the requirement for stakeholders' needs to be properly understood and accounted for. The requirement to provide sufficient detail, in an accessible and balanced manner, was highlighted alongside the need to allow sufficient time for the detail to be properly considered and responded to. Change sponsors and aviation consultancy firms also suggested that CAP1616 should acknowledge the transition to, and significant use of, digital engagement methodologies both throughout and following on from the COVID-19 pandemic.
- 4.7.8 Focussing on the engagement requirements for Stage 1 (DEFINE), national aviation representative organisations suggested that there should be a requirement for the change sponsor to engage on their overarching design objective(s) ahead of developing their design principles. It was felt that this would allow co-operative problem solving that might offer better solutions to the perceived opportunity/issue as presented in the Statement of Need.
- 4.7.9 Change sponsors and aviation consultancy firms suggested that the Stage 2 (DEVELOP & ASSESS) engagement requirements were confusing and that they needed to be clarified with definitive guidance on what's required and expected. It was observed that in some cases, particularly when there were many design options (some of which may be conceptual) being considered, it was difficult to provide stakeholders with sufficient detail to permit intelligent consideration. This had created frustration and contributed to engagement fatigue, thereby making it difficult to achieve meaningful engagement at this point in the process.
- 4.7.10 On Stage 3 (CONSULT), change sponsors and aviation consultancy firms noted that CAP1616 stated that 12-weeks was the "accepted standard" for consultations, and it was suggested that this was outdated and not reflected in current Government guidance. The latter states that consultations should last for a proportionate amount of time and that the nature and impact of the proposal(s) should be considered when determining the length of any consultation.

- 4.7.11 With regards to the regulatory processes for temporary airspace change proposals and airspace trials, it was noted that prior to the regulatory decision being made, the engagement requirements focussed on testing the safety and operational viability of the proposal with relevant aviation stakeholders. Community/environmental representatives suggested that all stakeholders should have the ability to comment on proposals to establish a temporary airspace change or airspace trial proposal prior to it being formally submitted to the CAA.
- 4.7.12 Change sponsors and aviation consultancy firms explained that it was difficult to satisfy the unique requirements and expectations of individual stakeholders. They suggested that CAP1616 should provide more guidance on how to analyse feedback, particularly when trying to balance the conflicting requirements of a wide variety of stakeholder interests.
- 4.7.13 Feedback suggested that there should be more interaction between stakeholders and the CAA. Some change sponsors and aviation consultancy firms would welcome more engagement between them and the CAA throughout the airspace change process. National aviation representative organisations suggested that their input should be sought at the key decision-making points (Gateways and Stage 5), so that the CAA can be assured that their interests have been addressed.

Engagement Survey Feedback

- 4.7.14 The survey asked a specific question about whether the CAA provided enough information during the airspace change process. In addition to this, responses on all open text questions contained commentary about engagement and consultation. This is discussed in more detail below.
- 4.7.15 The charts below (Figs.14 and 15) show how respondents answered the question about information provision; and the same question broken down by stakeholder:

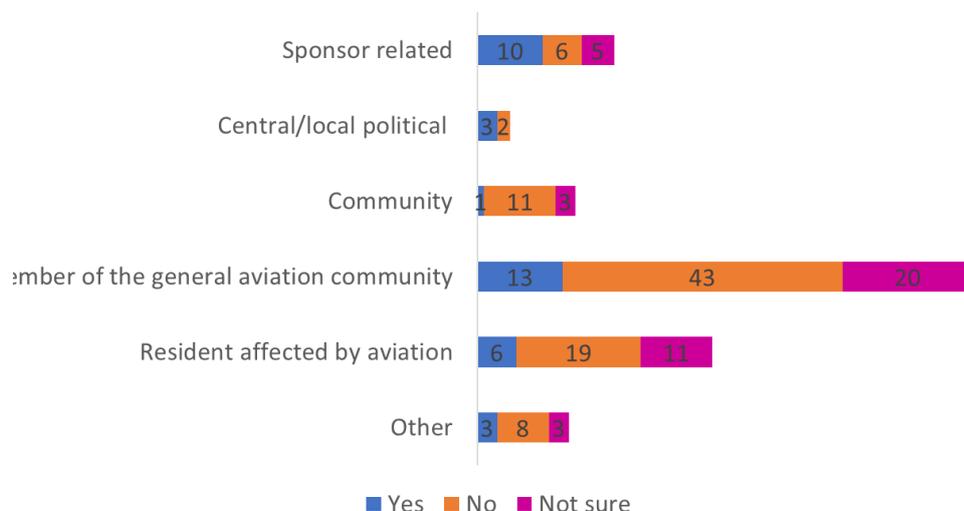
Fig.14 During the airspace change process, does the CAA provide enough information to you? (Percent)



Just over half (53%) of all respondents felt that the CAA did not provide enough information to them. A further quarter (25%) stated simply that they were not sure.

The chart opposite shows that just over half of the respondents who represented sponsors (10 out of 21), felt they had received enough information from the CAA. 11 out of 15 respondents representing communities felt that the CAA did not provide them with enough information. Around half of the respondents from the general aviation community (43 out of 76) and residents affected by aviation (19 out of 36) recorded a 'no' to this question.

Fig.15 During the airspace change process, does the CAA provide enough information to you? (Respondent type/number)



- 4.7.16 Stakeholders spoke of being made aware of information at times when they could not influence the process. For example, community stakeholders commented that they only became aware of the process at the post implementation review stage. They commented on the difficulties they had with engaging and trying to influence the process at this stage. Similarly, general aviation users spoke about finding out about airspace changes with little time to influence decisions about them.

“All too often local communities first become aware of air space changes during the implementation stage...The post implementation review becomes viewed as an opportunity to influence decision making. More should be done to ensure communities are aware of proposed air space changes at an earlier stage, but also greater clarity provided on what the aim of the post implementation review is.” **Central or local government body**

- 4.7.17 Some respondents wanted to see increased transparency of information provided by sponsors about their proposals. It was suggested reasons for redaction (“commercial interest”) should be appropriately vetted and balanced against the interest and needs of other stakeholders.

“There is a level of suspicion about some operator’s motives and so the process must become transparent in both situations. Commercial interests for instance must not override others’ safety.” **Member of the general aviation community**

- 4.7.18 The portal was not perceived as transparent by some respondents. Some stated how sponsors completing the airspace change process did not upload materials in a timely manner. This meant that some stakeholders were unaware of what

was being proposed, until late in the process. Other respondents felt the quality of materials added to the portal was questionable:

“Documents and changes are added to the site well behind the dates of the event or publication/release of documents.” [Member of the general aviation community](#)

“Portal publishes the information provided by the ACP sponsors but the quality of information provided by the sponsors can be lacking. e.g. maps provided...could not be used to identify which villages would be affected by proposals.” [Resident affected by aviation](#)

- 4.7.19 Sponsors spoke of the role of the CAA’s Airspace Regulation team during the process. Individual airspace regulators were often perceived as adopting variable approaches in the way they shared information and guidance at different stages of the process.

“The process is open to subjective interpretation by both the sponsor (or their aviation consultant) and the CAA gateway review teams and this often results in a lack of clarity over what is expected.” [Airspace change consultancy](#)

CAA response on Engagement, Communication and Information:

We will consider options to address the feedback linked to these them by:

- Reviewing the engagement requirements of the process and making them more effective, practical and meaningful for all.
- Providing addition clarity and guidance where possible.

4.8 Public Evidence Sessions (PES)

- 4.8.1 PES give an opportunity for stakeholders other than the sponsor to give their views directly to the CAA. Where there is sufficient interest to justify holding one and it is proportionate to do so, we will organise and facilitate a PES at Stage 5 of the process for Level 1 airspace change proposals only. Their purpose is to give an opportunity for stakeholders other than the change sponsor to provide the CAA decision-maker with their views on the airspace change proposal directly, in a public forum.

ACOG Feedback

- 4.8.2 No lessons were identified in the ACOG report in relation to this theme.

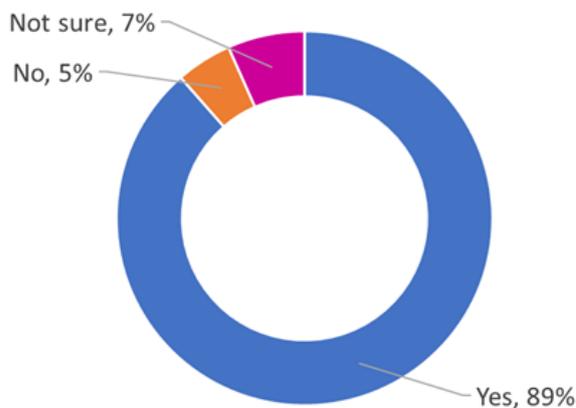
Workshop Feedback

4.8.3 Internal stakeholders discussed the timing of the PES and recognised that it had an impact on our ability to initiate the assessment work and deliver a regulatory decision in accordance with agreed timescales. A review of the Stage 5 flowchart, interdependencies and related timelines was suggested to clarify requirements and manage expectations accordingly.

Engagement Survey Feedback

4.8.4 The engagement survey asked a question about PES, specifically whether the CAA should continue to have the option of a PES.

Fig.16 Should the CAA keep the option of having a Public Evidence Session? (percent)

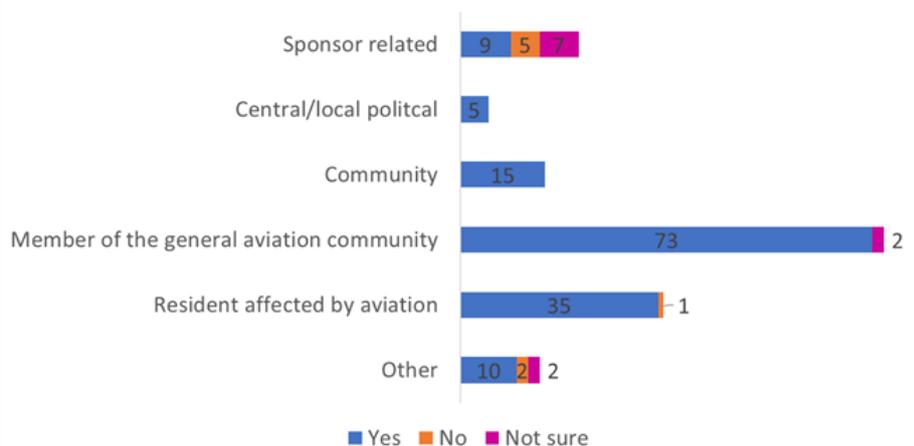


The chart opposite (Fig.16) shows how respondents answered this question about PES. Overall, nearly nine out of ten respondents (89%) wished to keep PES.

4.8.5 When breaking down responses by stakeholder group, a slightly different picture emerges.

The chart opposite (Fig.17) shows that overwhelmingly, most stakeholder groups wanted the continued inclusion of PES kept as an option. The stakeholder group with the highest number of respondents who answered ‘no’ to this question was the sponsor related cohort (5 out of 21). This group also had the highest proportion of respondents who answered ‘not sure’ (7 out of 21).

Should the CAA keep the option of having a Public Evidence Session? (Respondent type by number)



4.8.6 Qualitative responses explained some of the thinking behind responses. There were many reasons as to why respondents sought the continuation of PES. Some respondents mentioned the transparency element:

“Transparency and fairness is fundamental to a democracy and the way decisions are made. The industry has no shortage of expert advice to promote their case, community groups must be afforded similar such expert advice to be able to make informed comment.” [Community Noise Group](#)

- 4.8.7 Respondents also spoke of the opportunity it afforded to stakeholders to interact in a different way:

“It provides people who may not be so comfortable in putting things down on paper or email, a chance to engage. It also facilitates more interaction.” [Community Noise Group](#)

- 4.8.8 Others spoke of the need for the CAA to be closer to issues faced by stakeholders through PES:

“It was good for the CAA to experience the views of the public and how emotive a level 1 airspace change proposal can be, without this session the CAA can be shielded from this directly.” [Sponsor- Airport](#)

- 4.8.9 Those who were against the idea of PES spoke of the process already having adequate consultation and engagement opportunities installed. Some also remained unconvinced of the benefit of PES, as it was:

“The session felt like a duplication of consultation responses, as most representatives just read aloud their consultation response.” [Sponsor- Airport](#)

“While I agree on the need for public evidence sessions, I am cynical as to whether they have much effect.” [Member of the general aviation community](#)

CAA response on Public Evidence Sessions:

We will consider options to address the feedback linked to this theme by:

- Reviewing the PES requirements and making them more effective, practical and meaningful for all.

4.9 Temporary Airspace Changes/Trials

ACOG Feedback

4.9.1 No lessons were identified in the ACOG report in relation to this theme.

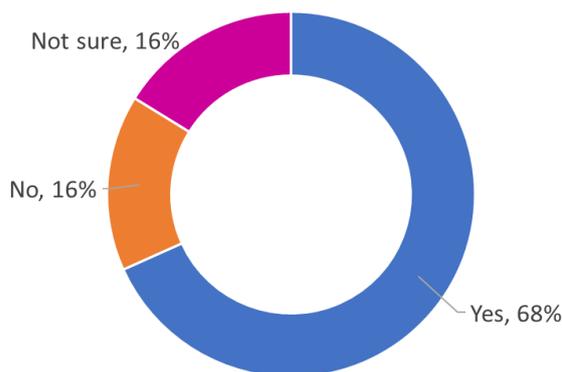
Workshop Feedback

4.9.2 Workshop feedback about the regulatory process for temporary airspace change proposals and airspace trials is given under ‘Stages/Steps/Gateways’ feedback above.

Engagement Survey Results

4.9.3 Respondents were asked whether a formal gateway should be provided in a temporary airspace change/trial ahead of engagement/consultation starting.

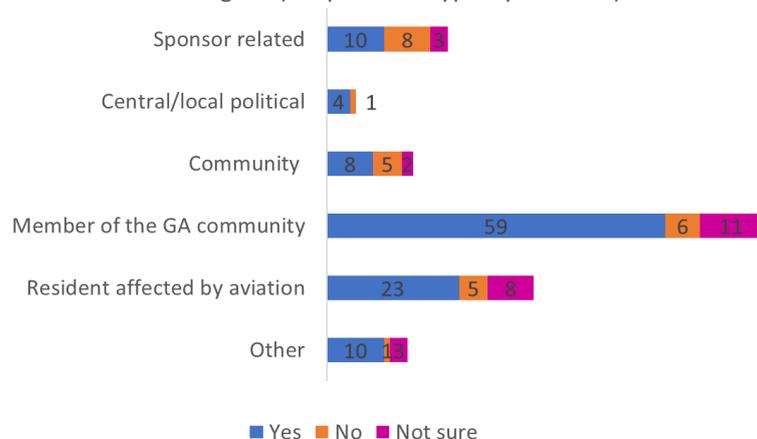
Fig.18 Should we provide a formal gateway for temporary airspace changes/trials in advance of targeted engagement/consultation commencing? (percent)



The chart opposite (Fig.18) shows that just over two thirds (68%) of respondents felt that a gateway should be provided in the process ahead of formal engagement/consultation.

The chart opposite (Fig.19) shows a breakdown of responses by stakeholder type in numbers. Over a third of respondents who identified as sponsor related said they did not want a gateway in the temporary airspace change process (8 out of 21). Whereas over three quarters of respondents who were from the general aviation community (59 out of 76) said they would like to see a gateway.

Fig.19 Should we provide a formal gateway for temporary airspace changes? (Respondent type by number)



4.9.4 Although there was not a direct open text question corresponding to this question, respondents still had their say elsewhere on the survey. Some respondents spoke about the importance of effective engagement across all types of airspace change:

““effective” consultation for all airspace changes, permanent as well as temporary.” [Member of the general aviation community](#)

4.9.5 Sponsor related respondents could see a need for a gateway to identify issues earlier to reduce the need for further resource:

“...There is a distinct possibility that without it, the CAA will not articulate exactly what they want and that a sponsor should know this soonest to be able to incorporate the necessary resource.” [Airspace change consultancy](#)

4.9.6 Rather than see another gateway, one (space related) sponsor suggested that engagement on planning consent could be used simultaneously for engagement on airspace change processes, to reduce impact on resource and over-engaging. Others wanted to see a scaling of the temporary process:

“It is suggested that the planning consent and associated legal requirement for an environmental impact assessment, are linked into the ACP process for spaceports such that the one process and engagement can be used for both – this...does not duplicate effort or waste valuable resource.” [Sponsor- Spaceport](#)

“Scaling the process is sensible, especially when the change is temporary.” [Locally Representative Organisation](#)

CAA response on Temporary Airspace Changes/Airspace Trials

We will consider options to address the feedback linked to this theme by:

- Reviewing the scalability of the temporary airspace change/airspace trials process.
- Considering how a temporary airspace change/airspace trial could transition to a permanent airspace change proposal.

5. Next Steps

5.1 What happens next?

- 5.1.1 We welcome the valuable feedback that we have received to date and appreciate the time that stakeholders have taken to provide us with their views on the CAP1616 airspace change process.
- 5.1.2 Having completed the analysis of the feedback received and identified several key themes (as described above), we are already starting to identify options to address what we have heard by reviewing the relevant parts of the CAP1616 airspace change process and considering potential changes.
- 5.1.3 Any changes which we propose to make will be subject to a formal public consultation process, through which we will clearly highlight what is being proposed and why. We plan to launch this consultation in the winter 2022, targeting relevant stakeholders and making the details available to the public through the CAA's Citizen Space consultation hub (<https://consultations.caa.co.uk>).
- 5.1.4 Feedback from the consultation will be reviewed and analysed. It may be necessary to subsequently modify our proposals in light of feedback received. Once the consultation process has been concluded, a report will be produced and decisions about the new airspace change guidance will be recorded and made available via our communications channels.
- 5.1.5 We will produce and publish a revised version (v5) of CAP1616, alongside any related transition arrangements should we feel that they are necessary.
- 5.1.6 Throughout this process, we remain committed to keeping stakeholders informed and will continue to ensure that our dedicated review webpage (www.caa.co.uk/review-of-CAP-1616) reflects the latest status of the review. All stakeholders are encouraged to monitor this webpage to ensure they keep abreast of further developments.

Appendix A: Citizen Space Survey

Are you responding as a:

- Resident affected by aviation
- Member of the general aviation community
- Change sponsor
- Airspace change consultancy
- Central or local government body
- Military
- Councillor or MP
- National representative organisation
- Local representative organisation
- Community noise group
- Other (please specify below)

What type of sponsor are you? (Only asked to those who identified as a 'sponsor' above).

- Air navigation service providers
- Airports
- Space industry
- Remotely piloted aircraft systems
- Other (please specify)

What do you think the review of the CAP1616 airspace change process needs to address the most? (Open text box)

How clear is CAP1616 at specifying what the Civil Aviation Authority's (CAA) regulatory requirements are?

- Very clear
- Clear
- Unclear
- Very unclear
- Not sure

Please tell us why you have responded in this way? (Open text box)

Do you think the number of stages/steps/gateways is appropriate?

	Yes it feels right	No there are too many	No there's not enough	I'm not sure
Stages				
Steps				
Gateways				

During the airspace change process, does the CAA provide enough information to you?

- Yes
- No
- Not Sure

Please tell us why you have responded in this way? (Open text box)

Do you agree or disagree with the following statements about scalability in the CAP1616 process?

	Agree	Disagree	Not sure
There are enough opportunities in the CAP1616 to scale the process			
The extent to which the CAP1616 process can be scaled is appropriate			

Tell us why you have responded in this way? (Open text box)

Should the CAA keep the option of having a Public Evidence Session?

- Yes
- No
- Not sure

Please tell us why you have responded in this way? (Open text box)

Should we provide a formal gateway for temporary airspace changes/trials in advance of targeted engagement/consultation commencing?

- Yes
- No
- Not sure

Are there any other comments you'd like to share with us with regards to the CAP1616 Airspace Change process? (Open text box)

Appendix B: Workshop Stakeholder List

Internal Workshops

Manager Airspace Regulation	Principal Airspace Regulator x 5	Airspace Regulator (Technical) x 2
Airspace Regulator (Engagement & Consultation) x 4	Airspace Regulator (Environment) x 2	Airspace Regulator (Economist)
Account Manager x 2		

External Workshop #1

Airfield Operators Group (AOG)	Airspace4All	British Helicopter Association (BHA)
General Aviation Alliance (GAA)	General Aviation Safety Council (GASCo)	

External Workshop #2

Aviation Environment Federation (AEF)	East Midlands Consultative Committee	Gatwick Noise Management Board Community Forum
Noise Consultant Limited	Strategic Aviation Specialist Interest Group (SASIG)	UK Airport Consultative Committee (UKACC)

External Workshop #3

Airspace Change Organising Group (ACOG)	Edinburgh Airport	Highlands & Islands Enterprise
Liverpool Airport	London Heathrow Airport	Ministry of Defence (MoD)
NATS	Trax	

External Workshop #4

Air Navigation Solutions (ANS)	Airport Operators Association (AOA)	Egis
Kemble Airport	London Gatwick	Merlin Aerospace Consulting Limited
Osprey CSL	Pildo Labs	Skyguide b2b Services

External Workshop #5

Altitude Angel	ARPAS-UK	Bristow UAS
FlyLogix	QinetiQ	Skyfarer Limited
Skyports	UAVE Limited	Windracers

Appendix C: Overview of the CAP1616 Airspace Change Process (Permanent)

Below is an overview of the CAP1616 stages.

Stage 1: DEFINE

A Statement of Need is submitted. This is a short statement that sets what the opportunity the airspace change proposal is seeking to address. Design Principles are developed and tested with stakeholders through engagement. The DEFINE GATEWAY occurs at the end of this stage. At the gateway the CAA's regulatory team discuss and decide whether the proposal should proceed to the next stage of the process.

Stage 2: DEVELOP & ASSESS

In this stage, options are developed for the proposal. The sponsor must submit a design principle evaluation and an initial options appraisal of the impacts. The DEVELOP & ASSESS GATEWAY occurs at the end of this stage.

Stage 3: CONSULT

In this stage the sponsor prepares and completes a consultation on the airspace change process. Firstly, they must produce a full appraisal of the option(s) they are proceeding with. Alongside this, they should also produce a consultation strategy. This is then submitted to the CAA in the CONSULT GATEWAY. After the Gateway, sponsors will need to launch the consultation and collate/review responses.

Stage 4: UPDATE & SUBMIT

In this stage, the sponsor considers the consultation responses, identifies any consequent design changes, and updates the options appraisal, submitting these to the CAA for review. If they are not required to consult again, the sponsor will formally submit their airspace change proposal to the CAA.

Stage 5: DECIDE

The CAA assesses the proposal in its entirety. There may be a Public Evidence Session. The CAA may issue a draft decision, subsequently will issue a final decision. Alternatively, a 'minded to' decision at the request of the Secretary of State who may have 'called in' the proposal could be produced. At the DECIDE Gateway assessment of materials and an approval must have been given by the CAA or (where the proposal has been 'called-in') by the Secretary of State.

Stage 6: IMPLEMENT

In this stage, an approved change is administered and communicated to stakeholders to ensure implementation. The sponsor must continue to consider stakeholder feedback a year after the change has been implemented.

Stage 7: POST IMPLEMENTATION REVIEW

If the proposal is approved, and after it has been implemented (Stage 6), the CAA carries out a review of the change (Stage 7), usually after 12 months of operation. During this stage, stakeholders are given 28 days to comment on the review whilst on the portal. There is no gateway at this stage.

Appendix D: Overview of the CAP1616 Airspace Change Process (Temporary)

There are four stages to go through for a Temporary Airspace change. They are summarised below.

STAGE 1- DEFINE

A Statement of Need is submitted. This is a short statement that sets what the opportunity the airspace change proposal is seeking to address. Although there is no formal requirement for options development (STAGE 2) at this point, where is a likely noise impact, there should be an assessment of noise.

STAGE 3- TARGETTED ENGAGEMENT OR CONSULTATION

The sponsor completes targeted engagement or consultation with aviation stakeholders and or impacted communities, if appropriate. The sponsor should also provide stakeholders with likely impacts of the airspace change proposal.

STAGE 4-UPDATE & SUBMIT

The sponsor will update their proposal (if necessary) and submit to the CAA.

STAGE 5- DECIDE

The CAA have a gateway meeting to determine agreement with the airspace change proposal. This process takes 28 days.