

Consultation on the airspace change process

CAP 3157

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Civil Aviation Authority
Aviation House
Beehive Ring Road
Crawley
West Sussex
RH6 0YR

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Foreword

Consultation on the airspace change process

The [CAP 1616 airspace change process](#) was introduced in 2018 following an independent review of its predecessor, [CAP 725](#). Since its introduction, we have reviewed and refreshed the process. Following consultation in 2023, edition 5 of CAP 1616 was published in January 2024. This update reflected feedback from stakeholders affected by airspace change and focused on making the process clearer and proportionate.

We are modernising the way we do airspace design in the UK to ensure we can deliver the changes necessary to modernise airspace efficiently and effectively with the establishment of the [UK Airspace Design Service](#) (UKADS). As such, we need to review our airspace change process again to ensure it enables the UKADS provider to deliver airspace changes. This also presents an opportunity to review the broader CAP 1616 airspace change process with a view to further streamline it.

As part of the [CAA's response to Government to further improve UK economic growth and investment](#), we [committed](#) to consulting on improvements to the effectiveness and proportionality of our process for changing airspace in 2025. This review allows us to reflect on feedback and operational experience since the implementation of CAP 1616: edition 5, identifying areas for further improvement and increased proportionality.

This document is a formal consultation setting out our proposals to modify the airspace change process. This consultation will last for 12 weeks and will close on Thursday 18 December 2025. We are asking consultees to respond via our dedicated online platform [Citizen Space](#), which will enable us to analyse your responses effectively.

The airspace change process can have an impact on a wide range of stakeholders. We welcome responses from everyone, including members of the public. All feedback will be considered and may lead to changes to the proposals contained within this consultation.

Jon Round

Head of Airspace, Air Traffic Management and Aerodromes

Chapter 1

Introduction

What this document is about

This document sets out the ways we are considering changing the airspace change process. We explain why changes are necessary and describe the key features of the revised process being explored. The proposed changes are presented in the form of key principles and their potential impacts.

This document is not about the [decision announced by the Government in March 2025](#) to modernise the way we do airspace design, or the airspace modernisation strategy and is not a consultation on the policy that the CAA must apply when making airspace change decisions. The CAA will consult separately on any changes to the airspace modernisation strategy. The Department for Transport has said it will consult on the Government policy that applies to airspace change decisions. Our dedicated [UK Airspace Design Service's \(UKADS\) webpages](#) provide further details, including information on associated planned consultations. We encourage readers to consider and respond to all the consultations that are described in the associated [CAP 3156: Modernising the way we do airspace design](#) and pictured in Annex A of that document.

We invite you to share your feedback on our proposals by responding to our questionnaire via our dedicated online platform [Citizen Space](#).

Only after we have received and analysed your views will we be in a position to decide which changes to take forward and incorporate into a revised version of the airspace change process.

This consultation is not a referendum. We will consider all views submitted and our decisions will be based on a balanced assessment of the evidence. We recognise that stakeholder perspectives may differ and we will not automatically adopt the ideas and solutions that receive the greatest volume of support. We must consider the views of many stakeholder groups before we make our final decisions on any changes to our airspace change process.

Who we are

This consultation is led by the Civil Aviation Authority (CAA). The CAA is a public corporation, established by Parliament in 1972 as an independent specialist aviation regulator.

Under section 66 of the [Transport Act 2000](#), the Secretary of State has given the CAA a number of airspace-related functions including: the duty to develop policy for the

classification of airspace, rules criteria and procedures for the use of airspace and to maintain an airspace modernisation strategy; to publish the UK airspace design and to approve changes to it or in some cases to the procedures for using it; and to prepare and maintain the [airspace modernisation strategy](#). These duties are further explained within the [Air Navigation Directions 2023](#).

We have a number of duties under section 70 of the Transport Act 2000, when considering whether to approve an airspace change proposal, including taking account of specific guidance on the environmental objectives given to the CAA by the Secretary of State contained within the [Air Navigation Guidance 2017](#).

The CAA, as the UK's independent aviation regulator, has primary responsibility for deciding whether to approve an airspace change proposal to the notified airspace design over the UK. We make these decisions in accordance with the legal framework outlined to consider certain factors including: safety; the environment; the needs of users of airspace; and government policy, including the airspace modernisation strategy.

The Secretary of State may, under certain conditions, decide to 'call-in' a particular airspace change proposal. In this instance the Secretary of State becomes the decision maker, instead of the CAA.

[CAP 1616: The Process for Changing the Notified Airspace Design version 5.1](#) outlines our current process for airspace change in the UK.

What we are consulting on

This consultation is **seeking your views** on changes to the airspace change process. This includes:

- Proposals on modifications to [CAP 1616: Airspace Change Process, version 5.1](#)
- Proposed airspace change proposal guidance for complex airspace change proposals sponsored by [the UKADS provider](#).

The impact of this consultation may create changes in related publications, this could include:

- [CAP 1616f 1.1: Guidance on airspace change process for permanent airspace change proposals](#)
- [CAP 1616g: Guidance on airspace change process for temporary and trial airspace change proposals](#)
- [CAP 1616h: Guidance on airspace change process for Level 3 and pre-scaled airspace change proposals](#)

- [CAP 1616i: Environmental assessment requirements and guidance for airspace change proposals](#)
- [CAP 1617: Planned and permanent redistribution of air traffic](#)
- [CAP 2989: Temporary or trial ACP for BVLOS – additional guidance](#)
- [CAP3042: Airspace Change: Masterplan Trade-off Procedure | UK Civil Aviation Authority](#)
- other associated CAA documents.

No final decisions have been made on the proposals.

In this consultation, we **are not seeking views** on any of the following:

- The decision to modernise the way we do airspace design by introducing the UKADS, and any future developments of the UKADS.
- Government policy that impacts the airspace change process.
- Airspace change funding arrangements.
- The airspace change [masterplan](#) and related processes.
- Any airspace change proposals, past or present.

We will only take into account elements of responses to this consultation that are within scope of this consultation.

[Terminology explained](#)

In this document we have provided an explanation of some common terms and abbreviations that relate to airspace change, in the interests of the non-technical reader. These explanations will not necessarily be the formal International Civil Aviation Organisation (ICAO)/CAA/Standardised Rules of the Air definitions, which can be found in [CAP 1430 UK Air Traffic Management Vocabulary](#).

[Who is this consultation for?](#)

This consultation is for anyone who uses, manages and designs airspace. It will also be of interest to anyone affected by changes that impact airspace use, such as communities affected by aviation noise or other environmental impacts.

We have intentionally minimised the use of technical terminology, as we appreciate that we have a wide range of stakeholders who will have an interest in the proposals.

How to respond

This consultation will run from Thursday 25 September 2025 to Thursday 18 December 2025, a consultation period of 12 weeks. We cannot commit to considering comments received after the date of closure of this consultation.

You should read this document before completing the corresponding consultation questionnaire. A copy of the questionnaire can also be found in Annex A.

You can submit your response using the questionnaire on our dedicated online platform [Citizen Space](#).

If you are unable to submit a response online, postal responses should be addressed to:

Airspace Regulation (Ref. CAP 1616 Review Consultation)
CAA Safety and Airspace Regulation Group
Aviation House
Beehive Ring Road
Crawley
West Sussex
RH6 0YR

The questions include some multiple-choice answers and the opportunity to submit your comments by completing free text boxes. We understand that some people may prefer not to be constrained by the questions alone and will want to send a self-contained response. While we will accept these submissions, we will not be able to analyse them in the same way that we analyse the online responses. Our preference is that you complete the online consultation questions.

We have sought to make this consultation as accessible as possible by presenting the key points on a [dedicated consultation website](#). This longer document you are reading is for stakeholders who want more detail. We encourage all stakeholders to read this document in full. We also encourage stakeholders to read [CAP 3156: Modernising the way we do airspace design](#) and note the additional planned consultations referred to in it.

Alternative formats

If you need this document in another format, please contact the CAA. We will endeavour to accommodate requests for alternative formats, each request will be considered individually.

Contact email: airspace.regulation@caa.co.uk

Next steps

Consultation responses, including any postal responses received, will be moderated and uploaded to the CAA's [Citizen Space Consultation Hub](#). Responses will be moderated to remove any unsuitable content and not as a means of censoring or filtering responses.

Once the consultation has closed, responses will be analysed. The feedback received will be considered and used to inform the development of a future airspace change process and guidance, including guidance for the UKADS provider. We will provide updates on our [dedicated consultation review pages](#).

The Department for Transport is expecting to consult on the Air Navigation Directions and Air Navigation Guidance. Any resulting changes in government policy on airspace will need to be taken into account in any updated CAA airspace change process and guidance documentation.

Chapter 2

Summary of our proposals

Summary of our proposals

This section provides summaries of our proposals. You are encouraged to read the full detailed proposals in chapter 4 prior to responding to this consultation.

Our overarching aim is to update the airspace change process and guidance to meet the objective to make regulatory requirements as proportionate and streamlined as possible, while retaining requirements that enable the CAA to make informed, evidence-based, transparent decisions.

At the same time, we want to ensure impacts continue to be addressed, understood, and transparently engaged on for the benefit of those who use and are affected by airspace changes. Ensuring the key principles of the current airspace change process are maintained is paramount. Safety, transparency, proportionality, accountability and consistency remain essential elements of the airspace change process.

Some proposals apply only to the UKADS provider for airspace change proposals sponsored by the UKADS, some proposals apply to all airspace change proposals and some proposals relate to specific pre-scaled airspace change processes. We have clearly marked which proposals the proposed changes apply to in the summary text.

All references to stages (and other elements) of the airspace change process in this document, unless otherwise stated, are references to the process as set out in CAP 1616 edition 5, version 5.1.

Our proposals only applicable to the UKADS provider for airspace change proposals sponsored by the UKADS include:

- **The UKADS provider would perform full and final options appraisals of the system end state against the baseline scenarios.** We anticipate that some complex airspace change proposals sponsored by the UKADS provider may need to be implemented in a series of deployments. We propose that the UKADS provider would not be required to model a multi-stage options appraisal process. The UKADS provider would only perform an assessment of the system end state design option(s) against the baseline scenarios in the full and final options appraisal. The UKADS provider would not be required to quantify and/or monetise each of its deployments. We also propose to change the length of the appraisal period to reflect the actual implementation timeline of the final deployment. As such, the appraisal period could be 10 years from the intended year of airspace change proposal implementation, or it could be shorter or longer, depending on the UKADS provider's timeline. This is our preferred option due to its simplicity and feasibility for complex airspace change proposals implemented in a series of deployments, but we set out other options we have considered. **(See Proposal 8, chapter 4).**
- **The UKADS provider would assess the combined impacts of the system-wide design, including any cumulative impacts, in the final options appraisal at Stage 4.** Once a final system-wide design has been selected and developed post consultation, the UKADS provider would be required to present the total impacts of the single system-wide design by collating the impact assessment outputs from each of the individual local airport designs. These combined system-wide impacts, including any cumulative impacts, would be assessed as part of the final options appraisal at Stage 4, prior to the submission of the airspace change proposal to the CAA for decision-making at Stage 5. **(See Proposal 9, chapter 4).**
- **Outline the information the UKADS provider would be required to provide to stakeholders prior to any individual deployment.** For complex airspace change proposals, due to their scale of change and size, it may not be possible for all the changes to be safely implemented in a single, simultaneous deployment. With the need to maintain the delivery of a real-time ongoing air traffic service, the airspace changes could need to be implemented in a series of deployments. We are seeking your feedback on what information you would like to know, or consider a change sponsor should ensure is provided to stakeholders, before implementation of each deployment in a multi-deployment approved airspace change. **(See Proposal 14, chapter 4).**

Applicable to all airspace change proposals, we propose to amend the CAP 1616 airspace change process by:

- **Reducing, removing or amending gateways.** Our preferred option proposes replacing the current Stage 1 and Stage 2 gateways with a milestone check and maintaining a gateway in Stage 3 - Consult, prior to the change sponsor's consultation. At the milestone check, we propose that the CAA would assess the change sponsor's submission against the airspace change process requirements and provide feedback to the change sponsor. However, the change sponsor would not need to pass a gateway to progress in the process. We propose we would retain the Consult gateway as it is now, which would provide regulatory oversight prior to the change sponsor launching their consultation. Our view is that a milestone check (Stages 1/2) and a gateway (Stage 3) is the right balance of regulatory requirements to provide assurance to change sponsors and stakeholders that the change sponsor has met the airspace change process requirements up to that point, prior to the change sponsor launching their consultation. **(See Proposal 1, chapter 4).**
- **Defining the role of proposer, change sponsor and partner.** The introduction of the UKADS requires us to propose a change to define the concepts of an airspace change proposal proposer, change sponsor and partner. We propose to retain the provision allowing anyone to submit an airspace change proposal. This individual or organisation submitting the airspace change proposal would be called a proposer of an airspace change, rather than the change sponsor. The sponsor of the airspace change would be the individual or the organisation responsible for progressing the airspace change proposal through the airspace change process. The proposer and change sponsor could be the same individual or organisation or they could be different. For example, an airport could be the proposer and the UKADS provider the change sponsor of the airspace change proposal. At the assessment meeting, we propose that it would be confirmed who would progress the airspace change as the change sponsor. The role of a partner is described in [Onboarding Process for the UK Airspace Design Service \(UKADS\) Provider \[for the London TMA Region\]](#) and would also be included in the airspace change process. A partner is an organisation, usually an airport or air navigation service provider, that is required to collaborate with the UKADS provider, where the UKADS provider will be the sponsor of the airspace change proposal. **(See Proposal 2, chapter 4).**

- **Creating a new set of standard design principles which apply to all airspace change proposals.** These design principles would continue to address safety, operational and environmental issues. The new set of standard design principles would align with the Air Navigation Guidance and government policy and directions which the CAA has a duty to consider when deciding on an airspace change proposal. Creating a new set of design principles would ensure a more standardised approach across all airspace change proposals, enabling all change sponsors to have a more consistent approach to design. Aligned to government guidance, change sponsors would still be required to consider local issues and circumstances against the new set of standard design principles. Stakeholder engagement would be undertaken to inform this, focused on representative-level engagement. **(See Proposal 3, chapter 4).**
- **Reducing the number of appraisals by removing the initial options appraisal.** By removing the initial options appraisal, we would remove duplication with other activities a change sponsor is required to complete in Stage 2. As the initial options appraisal duplicates several aspects undertaken in the design principle evaluation, this proposal would reduce duplication and reduce the activities the change sponsor would need to undertake. At Stage 2, the change sponsor would be required to describe what evidence would be collected and how they would develop the full options appraisal. Change sponsors would still undertake a full options appraisal to evaluate their design option(s) at Stage 3. Stakeholders would still be able to review the change sponsor's full options appraisal as part of the consultation materials. The full and final options appraisals would also continue to provide a comprehensive quantified and monetised assessment of the design option(s). **(See Proposal 4, chapter 4).**
- **Combining Stage 1 and Stage 2 of the airspace change process into a single stage.** Combining the current Stage 1 and Stage 2 would simplify the early steps of the airspace change process while maintaining key activities such as targeted stakeholder engagement and design development. If our other proposals relating to Stage 1 and Stage 2 were carried forward into the revised airspace change process, this would reduce the requirements for change sponsors in Stage 1 and Stage 2, resulting in a shorter process. As such, combining Stage 1 and Stage 2 into a single stage would be a logical step. **(See Proposal 5, chapter 4).**

- **Removing the requirement for the CAA's assessment of the change sponsor's initial and full options appraisal.** The CAA currently produces our assessment of the change sponsor's initial and full options appraisals and publishes it on the airspace change portal once a change sponsor has passed the current Stage 2 and Stage 3 gateways. However, in our view, it is too early in the development of the change sponsor's airspace design for the CAA to appraise its associated costs and benefits. This proposal would streamline our internal processes and reduce regulatory burden by removing duplication between the CAA's review that the change sponsor's initial and full options appraisals have met the requirements of the airspace change process at the Stage 2 and Stage 3 gateways and the CAA's options appraisal assessments. These are currently two parallel but separate activities. Consequently, the CAA would also no longer publish its assessment of the initial and the full options appraisals on the airspace change portal. The CAA would continue to review the process and methodologies followed by change sponsors to prepare the initial and full options appraisal as part of the gateway assessment. We would continue to produce and publish the CAA's assessment of the final options appraisal as part of the regulatory decision-making outputs at Stage 5, and this would be available on the airspace change portal. **(See Proposal 6, chapter 4).**
- **Reducing the number of metrics in the options appraisal.** We propose that we would continue to set environmental metrics in our airspace change process based on the guidance on the environmental objectives given to the CAA by the Secretary of State in the Air Navigation Guidance. We propose to remove metrics on topics such as increases in capacity and economic impacts from increased effective capacity. We also propose to remove those metrics from the options appraisals where experience has shown that the costs and benefits associated with them is similar across the design option(s) developed by a change sponsor. Therefore, such metrics do not provide a strong basis for selecting a preferred or best-performing option. Removing some of the metrics in the options appraisal would reduce regulatory burden, streamline the process, help to focus on relevant considerations, and reduce the amount of time required by change sponsors, as well as the CAA, to undertake the assessment of these metrics. This proposal would also reduce the volume of the options appraisals, thereby reducing the resources required for regulatory oversight. It would also help to reduce the amount of information presented to stakeholders in the consultation, allowing stakeholders to focus on the metrics that provide the most relevant insights. **(See Proposal 7, chapter 4).**

- **Removing reference to 12 weeks as the accepted standard length for airspace change consultations but maintain the requirement for change sponsors to agree with the CAA an appropriate period of consultation.** Removing the specific reference to 12-week consultations in the airspace change guidance would create better proportionality. It would enable change sponsors to propose a consultation length that is proportionate to the impact and scale of the change. This would also align with the Government's consultation principles. **(See Proposal 10, chapter 4).**
- **Refining and introducing new criteria for convening public evidence sessions.** We propose refining the criteria for when a public evidence session will be held for Level 1 changes and introducing new criteria for convening public evidence sessions for airspace change proposals where the UKADS provider is the change sponsor with five or more partners. By establishing clearer criteria for when a public evidence session would be held, change sponsors and stakeholders would have a clear indication at the start of an airspace change proposal as to when a public evidence session may be required. This would enable change sponsors to plan their timelines and resources appropriately, taking into account the requirements of a public evidence session when necessary. **(See Proposal 11, chapter 4).**
- **Removing the possibility of publication of draft CAA decisions.** The CAA has not utilised this option since its introduction. It was intended as a means to ensure that we had understood all the information provided to us and to ensure we did not make factual mistakes in our decisions. Experience to date shows that this has not been an issue and in our view the possibility of this step in the process does not add sufficient benefit to the process to justify retaining it. Removing the draft CAA decisions for Level 1 airspace change proposals would help streamline the process and reduce regulatory burden by removing a step that adds time to the proposal's timeline. **(See Proposal 12, chapter 4).**
- **Consolidating Stage 5 - Decide and Stage 6 - Implement.** We are not proposing to make any changes to the processes required for the current Stage 6, only that Stage 6 forms part of the current Stage 5 processes. The CAA's Stage 5 decision typically includes specific conditions that must be fulfilled by the change sponsor during Stage 6. Until the conditions required are met, the change sponsor cannot implement the change into the live air traffic system. Given this dependency, it is more logical and efficient for the requirements of Stage 6 to be incorporated into the decision made at Stage 5. **(See Proposal 13 chapter 4).**

- **Removing the post implementation review (PIR) and replacing it with an ongoing airspace performance oversight process.** We propose removing the Stage 7 - PIR and replacing it with a new separate regulatory oversight process to monitor the ongoing performance of UK airspace. This new oversight process would enable a performance review programme for UK airspace and would take account of the drivers for delivering the [airspace modernisation strategy](#), including the provision of data on the safety and efficiency of UK airspace. Replacing the PIR process with this new regulatory oversight process would help to shorten the airspace change process timeline and reduce resource requirements for the change sponsor, while still retaining the benefits of monitoring the impacts post implementation and correcting any issues that arise. **(See Proposal 15, chapter 4).**

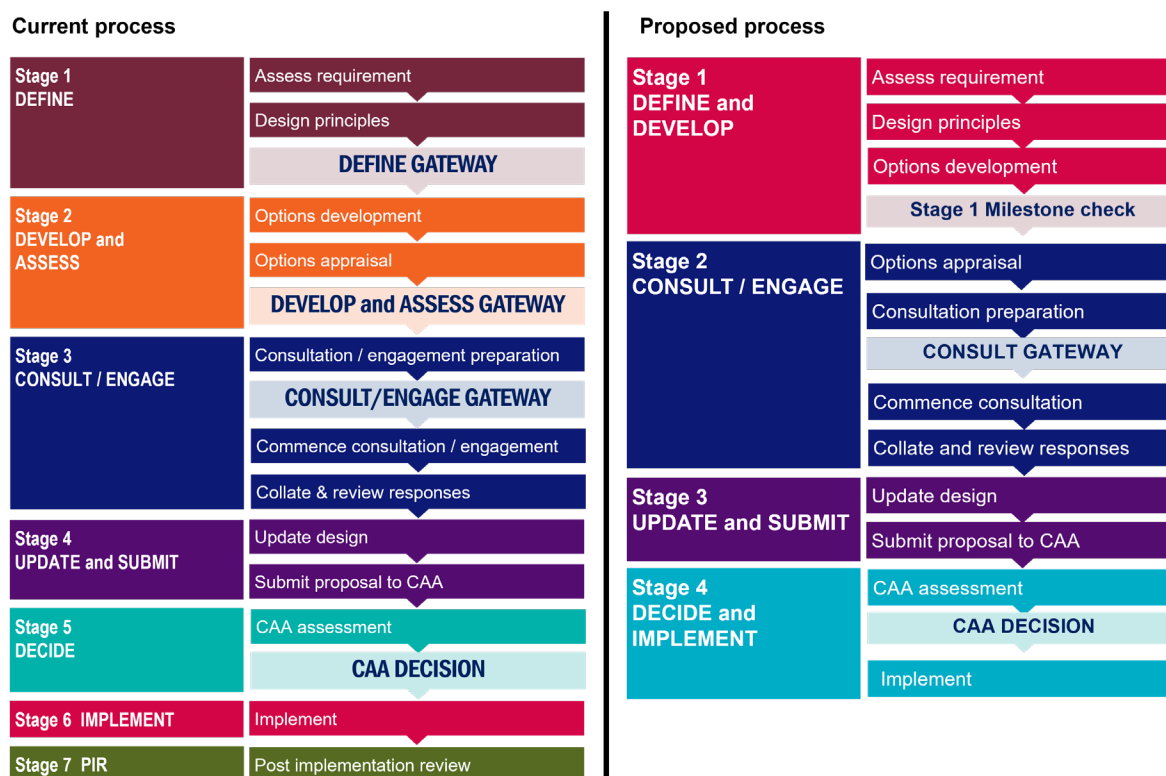
Our proposals relating to specific pre-scaled airspace change processes include:

- **Introducing a proportionate scaled process that enables conventional procedures that have been subject to RNAV Substitution (CAP 1781) and are already operational, to be replicated with fully PBN compliant procedures.** We propose that any procedure designed under [CAP 1781](#) would need to undertake a Level 3 airspace change to transition to a permanent solution. Level 3 airspace change proposals have the potential for low impact on aviation and non-aviation stakeholders. This would allow for the airspace change proposal to undergo a transparent, proportionate airspace change process. It would enable the transition from RNAV Substitution to a permanent solution in a timely and cost-effective manner. **(See Proposal 16, chapter 4).**
- **Developing a proportionate scaled process within CAP 1616 that would enable the establishment of short-duration volumes of segregated airspace for Beyond Visual Line of Sight (BVLOS) operations.** This new guidance would enable BVLOS operations of low impact on stakeholders and of short duration, allowing activation for up to 24 hours within a 7-day period, with flights only allowed between 8 am and 8 pm. The process would only apply to airspace change proposals outside of controlled airspace at a low level (below 500 feet). We propose that this proportionate approach to enabling BVLOS flights in the UK is needed to support the [Government's priority](#) of realising the economic growth benefits of new technologies and the joint Department for Transport and CAA future of flight strategy. **(See Proposal 17, chapter 4).**

We also recognise that, in due course, we will need to explain when, and if so how, change sponsors will be required to migrate from the current CAP 1616 airspace change process to any updated airspace change process:

- **Migrate from CAP 1616 edition 5 to any updated airspace change process.** Once we have made final decisions about any changes to our airspace change process, it will be necessary to publish policy and process on migrating from the current airspace change process to the new process. We are seeking your views on key areas you would like us to consider in that policy. (See chapter 5).

Diagram note: the diagram below is a visual representation of the current airspace change process described in this document and what the updated airspace change process would potentially look like if, after consideration of the consultation responses, all the proposed changes were implemented in the new airspace change process. This reflects the proposals as outlined in the summary section.



Chapter 3

Background

The current airspace change process

Airspace change proposals are requests from a change sponsor, usually an airport or a provider of air navigation services (including air traffic control), to change the notified airspace design published in the UK Aeronautical Information Publication (AIP).

The airspace change process change sponsors must follow is outlined in [CAP 1616 – Airspace Change Process version 5.1](#). Edition 5 of the process came into force in January 2024. All references to stages (and other elements) of the airspace change process in this document, unless otherwise stated, are references to the process as set out in edition 5 of the airspace change process.

The airspace change process meets current standards for regulatory decision-making and is fair, transparent, consistent, and proportionate. It is impartial, evidence-based and takes account of the needs and interests of all affected stakeholders.

The airspace change process is made up of different stages and gateways. The requirements vary depending on the type of airspace change proposal requested. This includes:

- permanent changes
- temporary changes and airspace trials.

Anyone can sponsor an airspace change proposal. The change sponsor owns the airspace change proposal and is responsible for developing and resourcing it, in accordance with the CAA's airspace change process.

Airspace change proposals vary in terms of size, scale of impact and complexity. Some may have minimal operational or environmental impacts. Others may involve complex structuring of airspace, with effects on both airspace users and the environment, including people on the ground impacted by noise. There are three levels of airspace change proposals, each with different requirements. Within each level the process may be scaled to support the proportionate application of the airspace change process.

The current airspace change process has seven stages:

- Stage 1 - Define
- Stage 2 - Develop and Assess
- Stage 3 - Consult/Engage
- Stage 4 - Update and Submit

- Stage 5 - Decide
- Stage 6 - Implement
- Stage 7 - Post Implementation Review (PIR).

The CAA monitors the progress of an airspace change proposal against the airspace change process requirements at three defined points called gateways: at the end of Stage 1, at the end of Stage 2, and during Stage 3. At each gateway, the change sponsor must submit the required outputs to the CAA for assessment and publish them on the airspace change portal. The CAA then assesses whether the process requirements have been followed so far. A change sponsor cannot progress through the process until they have passed the relevant gateway.

Passing a gateway does not predetermine the CAA's regulatory decision on the final airspace change proposal submitted at Stage 4. The gateways are to determine whether the airspace change process has been followed up to that point, and whether to approve progression to the next stage.

At Stage 5, the CAA will decide whether to approve the final airspace change proposal. If the airspace change proposal is approved, the change sponsor progresses to Stage 6 and will implement the change. The change sponsor must fulfil any conditions or modifications set out in the regulatory decision, finalise and submit aeronautical data to the CAA for validation and update all relevant documentation. During Stage 6, once the approved change has been implemented, the change sponsor must monitor the impacts of the change and continue to engage with stakeholders, considering feedback received regarding the impacts of the airspace change.

In Stage 7, the final stage of the process, the post implementation review (PIR) analyses the impacts of the implemented airspace change to allow the CAA to determine if it has produced the anticipated outcomes. The post implementation review is not a review of the decision that was made on the final airspace change proposal. A post implementation review must be completed for all Level 1 airspace change proposals. It is only completed for Level 2 and Level 3 airspace change proposal when the CAA determines it is proportionate to do so.

How the way we do airspace design is changing

In March 2025, the Government decided to reform the UK's approach to modernising the design of UK airspace by introducing a [UK Airspace Design Service \(UKADS\)](#). The UKADS provider will sponsor some but not all airspace changes in the UK.

Our CAP 1616 airspace change process will continue to form the basis of the regulatory framework for the UKADS provider. Where the UKADS provider is the sponsor of an airspace change proposal, it will work with relevant partners - usually an airport or air navigation service provider - who will collaborate with the UKADS provider. To address the

specific circumstances of a single design entity working with multiple partners, the CAA has committed to introducing new airspace change guidance applicable only to airspace change proposals sponsored by the UKADS provider.

Further information on this is set out in the associated [CAP 3156: Modernising the way we do airspace design](#). The contents of CAP 3156 are incorporated into this consultation material and consultees should consider the information CAP 3156 contains together with the contents of this document when considering the proposals we are consulting on.

You can find out more about the UKADS [on our dedicated webpages](#).

Previous engagement

In developing our proposals for modifications to the airspace change process, we have considered and undertaken a range of engagement activities to shape our thinking and inform our plans. This work has helped us to consider what matters most to our different stakeholders and how we can improve the airspace change process.

The following activities have been undertaken:

Review of previous consultations: We considered feedback received as part of the CAA's [consultation on the creation of the UK Airspace Design Service](#) held in 2024, and responses to our previous [CAP 1616 review consultation](#) held in 2022. This review contributed to our understanding of the strengths and limitations of the current process and helped to identify key areas for improvement.

Internal stakeholder workshops: A series of workshops with internal stakeholders was conducted, utilising the expertise of colleagues across the organisation to explore process improvements and practical considerations.

Engagement with key external stakeholders: We convened workshops with key external stakeholders who provided feedback on the current process. The workshops focused on areas in the current process which may need to change to enable the UKADS provider to deliver airspace changes effectively.

Lessons learned and ongoing feedback: Our proposals are also informed by reflecting on experience and feedback received since the introduction of [CAP 1616: version 5.1](#) in January 2024.

We have also taken into account [government policy](#) that regulators support growth by establishing a regulatory system that not only protects consumers and supports competition, but also

- encourages new investment, innovation, and growth;
- is targeted and proportionate;
- is transparent and predictable; and

- adapts to keep pace with innovation.

Collectively, these activities have provided a foundation for the proposals in this consultation. They reflect our commitment to continuous improvement, and the development of a more effective airspace change process. We remain committed to listening, learning, and improving - your feedback is an important part of that journey.

Chapter 4

Proposed changes

This chapter outlines the changes we are considering to improve the airspace change process. We are not rewriting our CAP 1616 airspace change process or guidance at this stage; therefore, we are consulting on the principles on which our proposed changes are based.

We have grouped the proposals into the stages in the current process they would impact. Some proposals apply to all airspace change proposals. Some proposals apply only to the airspace change proposals sponsored by the UK Airspace Design Service (UKADS) provider. Some proposals relate to specific pre-scaled airspace change processes. We have marked clearly under each proposal which it is applicable to.

Gateways

Proposal 1: Reduce, remove or amend gateways

Applicable to: All airspace change proposals

Current process

The CAP 1616 process for Level 1 and Level 2 airspace change proposals includes three gateways: one at the end of Stage 1, one at the end of Stage 2, and one during Stage 3. These gateways enable the CAA to monitor whether the airspace change process requirements have been met so far.

There are four possible gateway outcomes: 'passed', 'decision pending', 'not passed – targeted review', and 'not passed – full review'. The full description of these gateway outcomes can be found in [CAP 1616; version 5.1](#) paragraph 2.22.

The requirements for each gateway must be met before the change sponsor can progress to the next stage of the process. Even when the process requirements for each gateway have been met, this does not predetermine the CAA's regulatory decision at Stage 5.

Proposed change

We are seeking your views on the value of gateways and the process that could be followed for Level 1 and Level 2 permanent airspace change proposals. We have identified four potentially viable options and identified a preferred option:

Option 1 - No change:

- Gateways continue as they are now and are retained as checks on the change sponsor's progress through the airspace change process.
- A change sponsor could not progress through the airspace change process until they have met the process requirements of the relevant gateway.
- Retaining the gateways would help to provide assurance to change sponsors and stakeholders that the change sponsor has met the airspace change process requirements up to that point and could not progress further in the process until those requirements were met. However, retaining all gateways would not take the opportunity to make the regulatory process more proportionate by removing a procedural step and could prevent change sponsors from progressing through the process at a proportionate pace.

Option 2 – Replace all gateways with milestone checks:

- All gateways would be removed and replaced with milestone checks. A milestone check would have a list of areas that the CAA would review and provide feedback on. This milestone checklist would be similar to the current requirements of a gateway.
- The change sponsor would provide a timeline, to be agreed with the CAA and published on the airspace change portal, meaning stakeholders would be able to see when a milestone check was planned.
- The CAA would assess the documents submitted against the requirements for the airspace change process and publish feedback. As this would be feedback only, the CAA would not stop the change sponsor progressing in the process based on the process requirements being met or not met.
- The change sponsor could choose to do further work and to resubmit to the same milestone check for further feedback.
- This option is a balance between progression through the process at an appropriate pace while retaining transparency by publishing CAA feedback to the change sponsor on the airspace change portal.
- This option could increase the number of airspace change proposal failures at Stage 5, as, if the process requirements have not been met, the CAA could reject the proposal based on process.

Option 3 - Stage 1/2 milestone check and Stage 3 gateway (preferred option):

- The current Stage 1/2 gateways would be replaced with milestone checks in a process similar to option 2.

- The CAA would assess the documents submitted against the airspace change process requirements and publish feedback on the airspace change portal. As this would be feedback only, the change sponsor would not need to pass a gateway to progress in the process based on the process requirements being met or not met.
- Change sponsors would be required to pass a gateway during Stage 3, prior to, and in order to, commence, their consultation, as they do now.
- The milestone check feedback and the gateway outcome would be published on the airspace change portal.
- This is our preferred option because retaining the Stage 3 – Consult gateway would provide the right balance of regulatory oversight prior to the change sponsor launching their consultation. This would help to provide assurance to change sponsors and stakeholders that the change sponsor has met the airspace change process requirements up to that point.
- This option could mean that the change sponsor would be able to progress their airspace change proposal following the milestone check without taking into account the process feedback received from the CAA at the end of Stage 1/2. This could prevent the change sponsor from progressing at Stage 3 if the CAA found that the process requirements for Stage 1 and Stage 2 had not been met.

Option 4 - Remove gateways:

- All gateways would be removed. This would not change the requirements change sponsors must complete at each stage; however, it would remove the CAA's regulatory oversight of the process at these points.
- This would allow change sponsors to progress more quickly through the stages, as there would no longer be any CAA process checks.
- This option would mean that the change sponsor and stakeholders would not know if the change sponsor had met or not met any process requirements until Stage 5 – Decision.
- To ensure the process had been followed, prior to any technical checks by the CAA, we would need to introduce a process check at Stage 5. This could increase the number of airspace change proposal failures at Stage 5, as the CAA could reject the proposal based on process, without providing a technical analysis. This would mean that the change sponsor would have to return to an earlier stage of the process or restart their airspace change proposal entirely.

Our preferred option is option 3: Stage 1/2 milestone check and Stage 3 gateway. We believe this option provides the balance between the benefits of retaining a gateway and introducing a milestone check.

Note that, related to this proposal, as part of this consultation, we are also seeking your views on a proposal to combine Stage 1 and Stage 2 into a single stage (see Proposal 5, chapter 4). Following analysis and consideration of the feedback, we will make a decision whether to progress the proposal to combine Stage 1 and Stage 2. Separately to this proposal, therefore, if Proposal 5 was progressed following consultation, it would, in any event, reduce the number of gateways from three to two.

Questions

Question: Do you agree or disagree with our preferred option (option 3) to introduce a Stage 1/2 milestone check and retain a Stage 3 gateway?

Agree Disagree Unsure

Question: Please tell us why you have responded in this way.

Question: If you disagree with our preferred option (option 3), what is your preferred option?

Option 1: no change Option 2: milestone check Option 4: remove gateways

Other

Question: Please tell us why you have responded in this way.

Stage 1: Define and Stage 2: Develop and Assess

Proposal 2: Define the role of proposer, change sponsor and partner

Applicable to: All airspace change proposals

Current process

Anyone can submit and sponsor an airspace change proposal. A change sponsor may work in partnership with other organisations – such as aviation/airspace consultancy firms or approved procedure design organisations - when developing their airspace change proposal. However, the change sponsor remains solely responsible for ensuring compliance with the airspace change process. The individual or organisation who submits the request for an airspace change automatically becomes the sponsor of that airspace change proposal.

In Stage 1, the change sponsor produces a statement of need. The statement of need defines their requirement for a proposed change to airspace design and sets out their objectives, issues and opportunities associated with the airspace change. An assessment meeting will then determine whether the airspace change process is the appropriate mechanism for the change. Following the assessment meeting, the change sponsor will agree a timeline for the proposal with the CAA.

The introduction of the UKADS requires us to propose a change to define the concepts of an airspace change proposer, sponsor, and partner.

Any airspace change proposal which has the potential to interact with a UKADS provider sponsored airspace change proposal will need to be reviewed by the UKADS provider.

This means that, in the future, the individual or organisation submitting the airspace change proposal may not be the sponsor of the airspace change.

Proposed change

We propose to retain the provision allowing anyone to submit an airspace change proposal. This individual or organisation would be called a proposer of an airspace change, rather than the change sponsor. The change sponsor would be the individual or the organisation responsible for progressing the airspace change proposal through the airspace change process.

The proposer and change sponsor could be the same individual or organisation, or they could be different. For example, an airport could be the proposer and the UKADS provider the change sponsor of the airspace change proposal.

If the UKADS provider considers that they need to progress the airspace change proposal, and this is agreed as impacting the UKADS, they would become the change sponsor of that airspace change proposal. The proposer and potentially other organisations involved in the change - such as the relevant ANSP or airport - would then become partners with the UKADS provider in that airspace change proposal. The partner(s) would collaborate with the UKADS provider, who, as the change sponsor, would be responsible for progressing the proposal through the airspace change process.

When any airspace change proposal is commenced (via submitting a statement of need), the CAA will need to consider whether it impacts any mandate given to produce a single airspace change proposal incorporating multiple partners in any defined area of UK airspace. If it does, a decision will need to be made whether the objectives of the statement of need are incorporated into the objectives of the single airspace change proposal or whether the objectives cannot be progressed further because of the impact on the single airspace change proposal. This would initially be identified by the individual or organisation proposing the change when they submit their statement of need. The CAA would then review their statement of need.

If the CAA identifies that the UKADS provider may be required to sponsor the proposal, we would ask the proposer to contact the UKADS provider, share their statement of need and

request the UKADS provider's attendance at the assessment meeting (part of Stage 1 of the current process). The UKADS provider would then be required to attend the assessment meeting and hear the proposed change set out by the proposer. At the assessment meeting, it would be confirmed who would progress the airspace change as the change sponsor.

The role of a partner is described in [Onboarding Process for the UK Airspace Design Service \(UKADS\) Provider \[for the London TMA Region\]](#) already published and would also be included in the airspace change process. A partner is an organisation, usually an airport or air navigation service provider, that is required to collaborate with the UKADS provider, where the UKADS provider will be the sponsor of the airspace change proposal.

Questions

Question: Do you agree or disagree that a new proposer role is created - who proposes the airspace change and may or may not sponsor the change through the process?

Agree Disagree Unsure

Question: Please tell us why you have responded in this way.

Question: Do you agree or disagree that at the assessment meeting it should be confirmed who is the proposer and who is the change sponsor?

Agree Disagree Unsure

Question: Please tell us why you have responded in this way.

Proposal 3: Create a new set of standard design principles which apply to all airspace change proposals

Applicable to: All airspace change proposals

Current process

The change sponsor develops a list of design principles that act as a framework against which the change sponsor can develop and evaluate the design options to support the intended outcomes set out in the change sponsor's statement of need.

The mandatory design principles (MDP) for permanent Level 1 and Level 2 airspace change proposals are set out in [CAP 1616f](#) (page 20):

- MDP Safety - The airspace change proposal must maintain a high standard of safety and should seek to enhance current levels of safety.
- MDP Policy - The airspace change proposal should not be inconsistent with relevant legislation, the [CAA's airspace modernisation strategy](#) or Secretary of State and CAA's policy and guidance.
- MDP Environment - The airspace change proposal should deliver the Government's key environmental objectives with respect to air navigation as set out in the Government's [Air Navigation Guidance 2017](#).

CAP 1616f also outlines discretionary design principles that the change sponsor must consider. Change sponsors should use the discretionary design principles list to support the development of their design principles, selecting those which they feel are applicable to their airspace change proposal. A change sponsor may change the wording of the discretionary design principles listed in CAP 1616f.

Change sponsors must also consider developing bespoke design principles. The bespoke design principles give the change sponsor the capability to develop any design principles that are specific to the local context and circumstances of individual airspace change proposals. The change sponsor must consider both local context and national policy when developing the list of design principles.

The design principles must address any local competing priorities, for example, considering whether aircraft should as a priority should avoid flying over specific local areas or populations. The change sponsor must also undertake relevant engagement with local authorities and other relevant stakeholders to inform the development of design principles and to inform the development and assessment of design options.

Creating a new set of standard design principles would ensure a more standardised approach across all airspace change proposals.

Proposed change

We propose to develop one new set of standard design principles that would replace mandatory, discretionary and bespoke design principles, and apply to all airspace change proposals. These design principles would continue to address safety, operational and environmental issues. The new list of standard design principles which change sponsors must apply, would align with the Air Navigation Guidance and government policy and directions which the CAA has a duty to consider when deciding on an airspace change proposal.

Aligned to government guidance, change sponsors would still be required to consider local issues and circumstances against the new set of standard design principles. Stakeholder engagement would be undertaken to inform this, focused on representative-level engagement.

To reduce the regulatory burden and provide clarity to change sponsors, the CAA would also provide further guidance on options development against the standard design principles.

This proposal would enable all change sponsors to have a more consistent approach to design, as design option(s) would be explored in accordance with these standardised design principles. This would also make it easier for stakeholders to understand the airspace change process by providing consistency and clarity. This proposal means change sponsors are more likely to develop proposals that, if implemented, assist the Government policy to improve UK economic growth and investment, including by delivering the objectives of the airspace modernisation strategy.

Questions

Question: Do you agree or disagree that the CAA should produce a new set of standard design principles which apply to all airspace change proposals?

Agree Disagree Unsure

Question: Please tell us why you have responded in this way.

Question: Do you agree or disagree that a change sponsor should engage with relevant stakeholders to consider local issues and local circumstances against the new set of design principles?

Agree Disagree Unsure

Question: Please tell us why you have responded in this way.

Proposal 4: Reduce the number of appraisals by removing the initial options appraisal

Applicable to: All airspace change proposals

Current process

CAP 1616 requires change sponsors to present three phases of options appraisals:

- an 'initial' appraisal (at Stage 2)
- a 'full' appraisal (at Stage 3)
- a 'final' appraisal (at Stage 4).

The options appraisals are iterative processes which assess the impacts of the design option(s) as the proposal matures through the airspace change process.

The initial options appraisal should, as a minimum, contain qualitative assessments of the different design option(s) against the baseline scenarios. The baseline scenario represents the future scenario without the airspace change in place, at 1 year and 10-years after implementation of the airspace change. The baseline scenarios mean that a comparison can be made against the impacts of the design option(s).

As a minimum, the initial options appraisal of the baseline scenarios and each design option must include:

- A qualitative assessment of the likely environmental impacts, including all direct and consequential impacts.
- A high-level assessment of all reasonable costs and benefits involved.
- A qualitative assessment of the potential impacts on safety.

As part of the initial options appraisal, when applicable, the change sponsor is also required to provide supporting evidence for their view of the noise modelling category applicable to their airport (as set out in [CAP 2091, CAA Policy on Minimum Standards for Noise Modelling](#)) in their airspace change proposal. CAP 2091 refers to five categories of noise modelling to reflect the different levels of sophistication which can be used. At Stage 2, change sponsors identify the minimum acceptable level of sophistication of noise modelling that they must use (which is based on the category of noise modelling applicable to their airport) to provide the CAA with the outputs required for an airspace change proposal.

Additionally, the change sponsor must identify any evidence gaps in the initial options appraisal. For example, due to uncertainties in the assumptions made in the evaluation methodologies or gaps in the data used for the appraisal. The change sponsor must also describe what evidence will be collected and how they will address any gaps when they come to develop the full options appraisal in Stage 3. This includes what key data needs to be collected, where this data may be captured, how this data will be gathered, and how this data will be used to develop the full options appraisal.

At Stage 2, change sponsors often use similar factors in their design principle evaluation and in their qualitative assessments for the initial options appraisal. Both the design principle evaluation and the initial options appraisal are used to identify the design option(s) that meet certain factors, which can be progressed, or to identify design option(s) which do not meet certain factors and can be discontinued. However, we have found there is generally a duplication of analysis of similar factors, such as safety, environmental or economic metrics, against a similar baseline, in the design principle evaluation and in the initial options appraisal.

Both the design principle evaluation and the initial options appraisal are also based on a fair and consistent application of the assessment methodology across all design options, with a requirement for the change sponsor to provide a rationale where design option(s) are progressed or discontinued.

In our view, requiring a design principle evaluation and an initial options appraisal results in duplication of work for the change sponsor, increases the length and volume of their Stage 2 submissions but adds no value to stakeholders or the CAA when we complete our regulatory processes. Discrepancies between the design principle evaluation and initial options appraisals can also cause delays in the process when corrections and/or clarifications are required.

Proposed change

Option 1: Reduce the number of appraisals by removing the initial options appraisal (preferred option)

We propose to remove the requirement for the change sponsor to conduct an initial options appraisal.

In our [CAP 1616 consultation](#) undertaken in 2022, we asked for feedback on a proposal to consolidate the options appraisal requirements. In line with the feedback received, change sponsors are not required to conduct an initial options appraisal at Stage 2 for Level 3 airspace change proposals, unless the CAA specifies this as a requirement for that particular proposal.

Building on the success of applying this change for Level 3 airspace change proposals as set out in [CAP 1616g](#), we propose to extend this change to Level 1 and Level 2 airspace change proposals. This would reduce duplication of work, support proportionality and streamline the airspace change process for permanent changes.

The change sponsor would continue to perform a design principle evaluation, where a preliminary assessment of the performance of design option(s) can be evaluated. The change sponsor may also still discontinue design option(s) based on this assessment, as in the current CAP 1616 process.

The change sponsor would be required to describe what evidence would be collected and how to develop the full options appraisal. This would include the requirement for change sponsors to indicate the CAP 2091 noise modelling category applicable to the airspace change proposal. Providing a description of the methodology at Stage 2 that would be used in the Stage 3 full options appraisal would reduce the risk that the change sponsor applies the incorrect methodology for the full options appraisal, particularly in relation to their environmental assessments.

In Stage 3, change sponsors would still be required to undertake a full options appraisal against the statutory factors and, where applicable, government policy, that the CAA is required to consider. The full options appraisal will be objective (unbiased and evidence based), repeatable and consistent. It includes a detailed quantified and monetised

assessment of various metrics based on the most up-to-date, credible, and clearly referenced sources of data to assess the impacts of the design option(s) against the baseline scenarios. The full options appraisal will continue to have a detailed assessment of the impacts on safety.

The full options appraisal would continue to be presented and utilised in the consultation materials, where stakeholders would still be able to provide their feedback on the design option(s), including any specific feedback on the change sponsor's preferred design option.

We recognise that the initial options appraisal gives a high-level qualitative indication of potential impacts of design option(s) at Stage 2 and can also provide a further quantitative assessment for stakeholders. However, the initial options appraisal duplicates several aspects undertaken in the design principle evaluation. The full and final options appraisals will continue to provide a comprehensive quantified and monetised assessment of the design option(s) to support consultation activities.

Option 2: No change, maintain the initial options appraisal

We could maintain the initial options appraisal at Stage 2 as it is now. However, while the initial options appraisal would enable stakeholders to review the high-level indication of potential impacts at Stage 2 and change sponsors to discontinue design option(s) that do not meet certain factors, the duplication of the aspects of the assessment would remain. This option would not reduce the activities change sponsors are required to undertake.

Under our preferred option (option 1), stakeholders would still be able to review the full options appraisal as part of the change sponsor's consultation materials. The full and final options appraisals would also continue to provide a comprehensive quantified and monetised assessment of the design(s).

Questions

Question: Do you agree or disagree that the initial options appraisal should be removed from the airspace change process (option 1)?

Agree Disagree Unsure

Question: Please tell us why you have responded in this way.

Question: Do you agree or disagree that, in Stage 2, the change sponsor should be required to present a high-level description of the methodology they intend to follow to develop the assessments for the full options appraisal?

Agree Disagree Unsure

Question: Please tell us why you have responded in this way.

Proposal 5: Combine Stage 1 and Stage 2 of CAP 1616 into a single stage

Applicable to: All airspace change proposals

Current process

As already described, Stage 1 – Define, is where the change sponsor produces a statement of need. The statement of need defines the change sponsor's requirement for a proposed change to airspace design, setting out the objectives, issues and opportunities associated with the proposed airspace change. At an assessment meeting the CAA will then determine whether the airspace change process is the appropriate mechanism for addressing the objective/issue/opportunity, and therefore whether the proposal can continue on with the airspace change process. Following the assessment meeting, the change sponsor will agree a timeline for the proposal with the CAA.

The change sponsor must then describe the current-day scenario and develop design principles, which provide a framework against which design option(s) can be developed and evaluated. These are shared with relevant key stakeholders. The change sponsor must then demonstrate what they have heard and how their stakeholders' feedback has, or has not, informed the content of the current-day scenario and development of the design principles. Stage 1 does not look at detailed design ideas or specific flight paths, this comes later in the process.

In Stage 2 - Develop and Assess, the change sponsor develops design option(s) for the airspace change proposal and the baseline scenarios, which allow a comparison to be made between the impacts of the design option(s) and the impacts without an airspace change. The change sponsor engages with relevant key stakeholders on the baseline scenarios and design option(s), prior to conducting a design principle evaluation. The design principle evaluation, evaluates the design option(s) against the design principles that were developed in Stage 1 and may result in some options being discontinued.

The change sponsor then carries out an initial options appraisal, where the impacts of the remaining design option(s) are assessed against the baseline scenarios, and further options may be discontinued. Options appraisal is an iterative process that is developed as the change sponsor refines its proposals, with a full options appraisal conducted in Stage 3 and a final options appraisal in Stage 4. The options appraisal provides clear, comparable evidence on a range of factors, enabling a consistent comparison and assessment of different airspace design option(s) for a given proposal.

In this consultation we include proposals to refine requirements at Stage 1 and Stage 2. This includes proposals to create a new set of standard design principles (Proposal 3) which apply to all airspace change proposals and to remove the initial options appraisal (Proposal 4). When this consultation closes, following analysis and consideration of the feedback we will make a decision whether to progress these proposals affecting Stage 1 and Stage 2. If these proposals were progressed following consultation, it would enable a more proportionate and streamlined approach while retaining key elements. This would reduce the requirements for change sponsors in Stage 1 and Stage 2, resulting in a shorter process. Therefore, combining Stage 1 and Stage 2 would be a logical step.

Proposed change

We propose to combine Stage 1 and Stage 2 into one stage. It is important we retain the key elements of Stages 1 and 2, with a strong focus on transparency and targeted key stakeholder engagement.

At a high level, based on the current process, the requirements of the combined stage could be:

- statement of need
- assessment meeting
- creation of the airspace change proposal on the airspace change portal
- current-day scenario
- design principles
- stakeholder engagement on local circumstances and on design option(s)
- develop a list of design option(s)
- describe what evidence will be collected and how to develop the full options appraisal
- conduct the design principle evaluation.

Questions

Question: Do you agree or disagree that Stage 1 and Stage 2 should be combined in one stage?

Agree Disagree Unsure

Question: Please tell us why you have responded in this way.

Question: Do you agree or disagree with our proposed high-level overview of requirements to retain in a combined Stage 1 and Stage 2?

Agree Disagree Unsure

Question: Please tell us why you have responded in this way.

Stage 3 – Consult / Engage

Proposal 6: Remove the requirement for the CAA's assessment of the change sponsor's initial and full options appraisals

Applicable to: All airspace change proposals

Current process

Following the Stage 2 and Stage 3 gateways, the CAA currently produces and publishes our assessment of the change sponsor's initial and full options appraisals, respectively, on the airspace change portal once a change sponsor has passed the current Stage 2 and Stage 3 gateways.

This process creates duplication between the CAA's review that the change sponsor's initial and full options appraisals have met the requirements of the airspace change process at the Stage 2 and Stage 3 gateways, and the CAA's options appraisal assessments. These are currently two parallel but separate activities.

Proposed change

Option 1: Remove the requirement for the CAA's assessment of the change sponsor's initial and full options appraisal (preferred option)

We propose to remove the requirement for the CAA to produce an assessment of the change sponsor's initial and full options appraisals and publish them on the airspace change portal once a change sponsor has passed the Stage 2 and Stage 3 gateways respectively.

In Proposal 4, we propose to remove the requirement for an initial options appraisal and this would also remove the CAA's requirement to produce and publish our assessment of the initial options appraisal. We propose that after the Stage 3 – Consult gateway, the CAA would no longer produce an assessment of the change sponsor's full options appraisal. In our view, it is too early in the development of the change sponsor's airspace design for the CAA to appraise its associated costs and benefits and duplicates work conducted later in the process.

This approach would align with the approach taken for other subject matter expert assessments conducted by the CAA, such as the consultation assessment and the safety

assessment. These assessments are not published with each gateway outcome but are published after the CAA's decision at Stage 5.

We would continue to assess the process and methodologies followed by the change sponsor to prepare the initial and full options appraisals against the CAP 1616 process requirements as part of the current Stage 2 and current Stage 3 gateway assessments. We would also continue to produce the CAA's assessment of the change sponsor's final options appraisal as part of the regulatory decision-making outputs at Stage 5, and this would continue to be published on the airspace change portal.

This change would streamline our internal processes, removing the duplication between assessments undertaken for the gateway, and the CAA's assessment of the initial and full options appraisals.

Stakeholders would continue to know that the CAA has assessed the process and methodologies followed by the change sponsor to prepare the full options appraisal against the airspace change process requirements as part of our regulatory review for the Stage 3 gateway, before the change sponsor can commence their consultation.

Stakeholders would also still be able to access the change sponsor's full options appraisal as this is published on the airspace change portal after passing the Stage 3 gateway as part of the change sponsor's consultation documentation.

Option 2: No change, the CAA continues to produce and publish our assessment of the change sponsor's initial and full options appraisal

We could continue to produce our assessment of the change sponsor's initial and full options appraisal and publish it on the airspace change portal, as we do now. However, this is not our preferred option as it would perpetuate the issues of prematurity and duplication.

Questions

Question: Do you agree or disagree that the requirement for the CAA's assessment of the change sponsor's initial and full options appraisals is removed (option 1)?

Agree Disagree Unsure

Question: Please tell us why you have responded in this way.

Proposal 7: Reduce the number of metrics in the options appraisal

Applicable to: All airspace change proposals

Current process

As part of their options appraisal, change sponsors use a set of metrics to assess and compare the potential costs/benefits of different design option(s) considered in their airspace change proposal.

A high-level overview of the overarching metrics required for the options appraisals is as follows:

- Noise, including;
 - noise exposure contours above 51 dB $L_{Aeq,16h}$ daytime and 45 dB $L_{Aeq,8h}$ night-time and evaluated by Department for Transport's transport analysis guidance (TAG) for impacts on health and quality of life.
 - Number above contours: N65 for daytime and N60 for night-time noise.
 - Overflight contours.
 - Operational diagrams.
 - Other noise metrics where relevant.
- Local air quality, including explicit consideration of, and evaluated by Department for Transport's transport analysis guidance (TAG) where necessary.
- Greenhouse gas emissions, including annual CO₂e totals and evaluated by Department for Transport's transport analysis guidance (TAG).
- Tranquillity.
- Biodiversity.
- Capacity/resilience.
- Access.
- Economic impact from increased effective capacity.
- Fuel burn.
- Training costs.
- Other costs.
- Infrastructure costs.
- Operational costs.

- Deployment costs.

This list is not exhaustive and change sponsors should endeavour to understand all the potential costs and benefits that may be relevant for their specific airspace change proposal.

The change sponsor is also required to value all relevant costs and benefits of the design option(s) through their net present value (NPV) and benefit cost ratio (BCR) which are commonly used measures to summarise the cost benefit analysis (CBA).

The current environmental metric assessment requirements in the airspace change process, which includes noise, greenhouse gas emissions (including fuel burn), local air quality, tranquillity and biodiversity are taken from the guidance on environmental objectives given to the CAA by the Secretary State set out in the Government's [Air Navigation Guidance \(2017\)](#). We will continue to set environmental metrics in our airspace change process based on the guidance in the Government's Air Navigation Guidance.

Proposed change

We are consulting only on the metrics directly influenced by airspace design and that the CAA is therefore able to affect by its decision at the end of the airspace change process.

We propose to remove metrics on topics such as increases in capacity and economic impacts from increased effective capacity because those are matters for planning consents. We explain this in more detail in [CAP 3156: Modernising the way we do airspace design](#).

We also propose to remove those metrics from the options appraisals where experience has shown that the costs and benefits associated with them is similar across the different design option(s) developed by a change sponsor and therefore, such metrics do not provide a strong basis for selecting a preferred or best-performing option. We therefore propose to **remove** the following metrics used in the options appraisal:

- Training costs.
- Infrastructure costs.
- Operational costs.
- Deployment costs.
- Other costs.

We propose to **retain** the following factors that align with Section 70 of the Transport Act 2000 and the airspace modernisation strategy:

- Safety.
- Airspace efficiency, including simplicity.
- Access, including integration.

Where metrics are monetised, the change sponsor would continue to provide the net present value (NPV) and benefit cost ratio (BCR) to summarise the cost benefit analysis (CBA) for their design option(s).

The removal of these metrics from the options appraisal would facilitate a reduction in resources required by the change sponsor, helping to streamline the process and reduce the amount of time required by change sponsors as well as the CAA to undertake the assessment of these metrics and thereby also reduce regulatory burden. This would also reduce the length and volume of the options appraisals, thereby reducing the resources required for regulatory oversight. It would also help to reduce the amount of information presented to stakeholders in the consultation, allowing stakeholders to focus on the metrics that provide the most relevant considerations and insights.

Reducing the number of metrics could make it more difficult for stakeholders to understand the costs associated with the airspace change. Although, change sponsors could still choose to undertake assessment of any additional metrics that they consider would assist them in their work. However, they would not be submitted to the CAA as a relevant consideration for our airspace change decision.

Questions

Question: Do you agree or disagree that the options appraisal should include a shortened list of metrics?

Agree Disagree Unsure

Question: Please tell us why you have responded in this way?

Question: Do you agree or disagree with the shortened list of metrics we have proposed?

Agree Disagree Unsure

Question: Please tell us why you have responded in this way?

Question: Are there any other metrics you think should be included in the options appraisal, and if so, why?

Proposal 8: The UKADS provider would perform full and final options appraisals of the system end state against the baseline scenarios

Applicable to: the UKADS provider sponsored airspace change proposals

Current process

The change sponsor must conduct the options appraisals of each design option against the baseline scenarios to understand its impacts. The baseline scenario represents the future scenario without the airspace change in place, at 1 year and 10-years after implementation of the airspace change. The baseline scenarios mean that a comparison can be made against the impacts of the design option(s). The assessment comparisons are:

- year of implementation with the proposed airspace change versus the same year without the proposed airspace change (year 1)
- 10-years after implementation with the proposed airspace change versus the same year without the proposed airspace change (year 10).

The full and final options appraisals require quantified and monetised assessment of the design option(s), where all reasonable costs and benefits have been quantified over the appraisal period of the airspace change.

Currently, the CAA's airspace change process requires change sponsors to monetise the environmental impacts of the airspace change using the DfT's Transport Analysis Guidance (TAG) environmental impacts worksheets in accordance with the Secretary of State's guidance to the CAA (in the Air Navigation Guidance). These worksheets require input from change sponsors on the impacts with and without airspace change scenarios for year 1 and year 10. The TAG workbooks then automatically calculate the impacts for the years in between by assuming the change happens gradually and evenly over that time. This assumes that the airspace change has been implemented in a single deployment at year 1.

Due to the scale of change and size of some complex airspace change proposals, it may not be possible for the UKADS provider to safely implement all aspects of an approved airspace change proposal in a single, simultaneous deployment. With the need to maintain the delivery of a real-time ongoing air traffic service, the airspace changes could need to be implemented in a series of deployments. These deployments may need to be phased over a period of years. This could lead to steps being required to safely sequence the deployments.

In the case of a phased deployment of an airspace change proposal, assuming the impacts from all deployments would occur from year 1, or assuming the impacts would increment linearly over the appraisal period from year 1 (corresponding with the first deployment) to year 10 (corresponding with the last deployment) would not provide an accurate representation. This is especially true when the impacts from the deployments

are dissimilar in scope, magnitude and duration. Calculations of monetised metrics through TAG would also depict incorrect results and values for the Net Present Value (NPV) and Cost-Benefit Analysis (CBA). This would in turn misrepresent impacts, for example, those related to the health and quality of life, which might lead to inconsistent feedback received in the change sponsor's consultation.

Proposed change

Our proposal relates to some complex airspace change proposals sponsored by the UKADS provider, where there is a need for multiple deployments to implement the approved change.

Option 1: Multi-stage options appraisal (discounted)

For TAG to correctly calculate outputs associated with airspace change proposals that are implemented over a series of deployments, it would be necessary for the impacts of each deployment to be assessed against the baseline scenarios over their individual appraisal periods reflecting their implementation year and until the year when the next deployment is implemented.

The assessment of impacts from each successive deployment would also need to include impacts from each preceding deployments, as these would already be occurring, comparing these collectively against the baseline scenarios – this is referred to as a multi-stage options appraisal process.

The multi-stage options appraisal presents the most robust and realistic quantified and monetised assessments. Stakeholders would have information on the specific change and impacts from each deployment and their duration as they are implemented over the appraisal period. Impacts from each deployment would reflect those actually perceived as compared to the current-day impacts as each successive deployment is implemented.

A single airspace change proposal following the standardised approach to options appraisal using TAG requires four models of user input: baseline (implementation year), baseline (forecast year), airspace change proposal (implementation year) and airspace change proposal (forecast year). However, the multi-stage options appraisal process using TAG would require more intermediate models to be developed, on a case-by-case basis and depending on the environmental metric assessed. For example, the assessment of adverse noise effects related to health and quality of life using TAG would require four additional models for each deployment. These additional models would have to be built for every design option that is presented to stakeholders for consultation. Therefore, the multi-stage options appraisal is considered to be unsuitable for a large number of design options.

Even a single design option would require four times the environmental analysis compared to a standard airspace change proposal. This would be a significant increase in workload for the UKADS provider and would impact timelines and budgets. The multi-stage options appraisal process for those complex airspace change proposals which are planned to be

implemented in a series of deployments would significantly increase the length and volume of the consultation materials, creating confusion and potential stakeholder fatigue.

Assessment results from the multi-stage options appraisal would also be influenced by the order and nature of the series of deployments. It would therefore be crucial to understand which airports are involved in each phase of the deployments and whether some airports would participate in more than one deployment. This would require the design (airports/sectors/areas), scope (magnitudes of different phases and potential impacts) and implementation schedule of phased deployments (timelines for implementation and forecast year and any other intermediate years of importance) to be planned and established prior to any impact assessments undertaken to reduce time and effort associated with re-work.

There is also a risk if an options appraisal following the multi-stage process - including impact assessments for each deployment - is approved at Stage 5, but then one deployment is then delayed or amended. The assessment results for the subsequent deployments, as presented in the consultation material and final options appraisal, may no longer be valid. The multi-stage options appraisal introduces higher risk of assessment validity and uncertainty if there is any change to the underlying basis for assumptions used in producing the analysis.

For large infrastructure projects with deferred implementation dates and a future baseline, understanding the changes becomes increasingly difficult as the number of assumptions starts to rise and reliability decreases. Uncertainties in forecasting, such as traffic movements and fleet mix, increase over time the longer the appraisal period. The impact of discounting would also mean that future values would have lesser weighting today compared with values one or two years from now.

In the multi-stage options appraisal process, stakeholders understand the incremental changes as the airspace change proposal deployments materialise, but it is subject to many assumptions and risks including changes to deployment start and completion dates which could have a knock-on effect to all future deployments and the associated modelling/TAG evaluations.

Option 1 has been discounted due to its constraints. This method is considered to be unfeasible for complex airspace change proposals.

Option 2: End state options appraisal (preferred option)

Given the positives and negatives of the multi-stage options appraisal process, we propose that for complex single airspace change proposals sponsored by the UKADS provider which would need to be implemented in a series of deployments spanning a number of years, the UKADS provider would not be required to model a multi-stage options appraisal process for the full and final options appraisals.

The UKADS provider would only perform an assessment of the system end state design option(s) against the baseline scenarios in the full and final options appraisals. The

UKADS provider would also not be required to quantify and/or monetise each of its deployments.

The main purpose of the options appraisal process is to identify the best option, taking account of all parameters and necessary trade-offs. The appraisal is a theoretical evaluation of the design option(s) based on their overall performance when compared to what is happening today. The appraisal also serves as a mechanism to discontinue underperforming design option(s) using objective and unbiased evidence.

The value of predicting the impacts of each deployment at the outset of the airspace change proposal is questionable due to the number of variables and assumptions over a long timeframe and the risk of deployment delay or amendment. It also makes the comparison of options very complicated for stakeholders and does not necessarily inform the choice of the best design option overall.

For most stakeholders, the easiest way to understand the difference between impacts would be to have a comparison of the baseline scenarios (informed by current day) against different system end state designs, assuming their full implementation at year 1. This comparison ignores all interim deployment phases in the evaluation. This is our preferred option for the purposes of the full and final options appraisals methodologies.

The baseline scenarios would be informed by the current-day scenario over the length of the appraisal period. This would avoid any issues related to 'change on change', meaning the baseline scenarios would not need to be updated following each successive deployment and stakeholders would have information on the impacts of the change associated with the system end state design as compared to the current-day impacts.

However, for some complex single airspace change proposals sponsored by the UKADS provider, we propose to change the length of the appraisal period to reflect the actual implementation timeline of its deployments. As such, the appraisal period could be 10 years from the intended year of airspace change proposal implementation, or it could be shorter or longer, depending on the UKADS provider's timeline.

A drawback of our preferred option is that the change sponsor's consultation would not provide clear and transparent information for stakeholders of the impacts over the initial years of the deployments. Impacts of any one deployment could be either highly over or underestimated, especially if the various deployments are very distinct. NPV and CBA values would also be highly distorted and nonrepresentative of actual impacts. In the event the change sponsor progresses and consults on more than one system end state design option, this approach also assumes that the deployments of each option are broadly similar in scope, magnitude of impacts and timelines, which may not be the case.

Given that we consider this to be a pragmatic approach to a complex problem and taking into account the fact that stakeholders will be fully informed of the impacts of the end state design as well as the disadvantage that stakeholders will not be informed on the impacts of each deployment, option 2: end state options appraisal, is overall our preferred option due to its simplicity and feasibility for a complex airspace change proposal.

Option 3: A combination of the multi-stage and end state options appraisal (discounted)

An alternative option, balancing proportionality between the multi-stage options appraisal option and our preferred end state options appraisal option would be to continue using the baseline versus system end state comparisons to identify the best design option(s) to take to consultation, as well as at the Stage 5 decision stage. The UKADS provider would then conduct baseline and specific impact assessment studies before each deployment.

This would not be defined by set dates, but by agreed points in the deployment programme. This would mean that the baseline would be up-to-date and reliable for stakeholders. It would minimise assumptions on aircraft traffic growth/mix, population growth etc. and allow for the impacts of the previous deployments to be evaluated thereby improving overall accuracy. It would also spread the cost of assessment and modelling for the UKADS provider. This would also mean that unpredicted issues arising during early deployments can be identified and fed into the assessment of future deployments.

However, since this would occur post CAA decision at Stage 5, the CAA would have no regulatory oversight of these assessments. As such, this option has been discounted.

Questions

Question: Do you agree or disagree that the UKADS provider **should** be required to only perform an assessment of the system end state design option(s) against the baseline scenarios in the full and final options appraisals – our preferred option?

Agree Disagree Unsure

Question: Please tell us why you have responded in this way.

Question: Do you agree or disagree that the UKADS provider **should not** be required to quantify and/or monetise each of its deployment stages?

Agree Disagree Unsure

Question: Please tell us why you have responded in this way.

Question: Do you agree or disagree that year 10 (after implementation with the proposed airspace change) is still an appropriate duration for the appraisal period, given that the deployments within some complex airspace change proposals may span longer or shorter than 10 years?

Agree Disagree Unsure

Question: Please tell us why you have responded in this way.

Question: If you disagree, what do you think is an appropriate duration for the appraisal period for a complex airspace change proposal implemented in a series of deployments?

Proposal 9: The UKADS provider would assess the combined impacts of the system-wide design, including any cumulative impacts, in the final options appraisal at Stage 4

Applicable to: the UKADS provider sponsored airspace change proposals

Current process

If an airspace change proposal is linked to another airspace change proposal (for example, it is either contingent upon or an enabler for, or is part of a 'phased' implementation programme of changes) this link must be clearly identified through the engagement and consultation processes, and in the final airspace change proposal submitted to the CAA. The environmental impacts of the linked proposals must be assessed on a combined basis ([CAP 1616i](#) paragraph 2.20).

Combined impacts are those that represent the total positive and negative effects of all linked airspace change proposals when considered together. Cumulative impacts refer to those that occur when specific design options overlap in the same airspace below 7,000 feet.

It is necessary to consider how the impacts in a single airspace change proposal covering multiple airports would be assessed. For example, the proposed London TMA region (comprising the current London Cluster of airspace change proposals) would include current ongoing airspace change proposals relating to 11 airports in the southeast of England. An airspace change process requiring an assessment of combined impacts for an airspace change proposal sponsored by the UKADS provider would result in an unmanageably high number of combinations. For example, for 11 airports with 3 local design options each, the number of combinations to assess on a combined basis would be 177,147 (3^{11}). This is unfeasible in terms of workload, project timelines, funding budgets, and modelling/assessment resourcing. It may also lead to stakeholder confusion and fatigue due to high volume of materials which would be required for consultation. It would also create disproportionate regulatory oversight demands on the CAA's resources and greater costs to industry which may delay or even prevent the progress in modernisation of the UK's airspace design.

The assessment results are also unlikely to be coherent enough to robustly examine combined impacts of the proposed changes to support balanced trade-off decisions between the designs, including selecting a preferred system-wide design option. As a

result, it is likely the UKADS provider would simply select the individual airport's design option which performs best against the design principles, progressing it into the system-wide design which would prevent the UKADS's provider developing the optimum system-wide design, a fundamental objective of the proposal to introduce the UKADS.

Proposed change

We propose that for complex single airspace change proposals the UKADS provider would not be required to assess the combined impacts of the system-wide design in the full options appraisal at Stage 3. These impacts would instead be assessed as part of the final options appraisal at Stage 4 when a final system-wide design has been selected and developed post consultation. These would then be presented as part of the airspace change proposal submitted to the CAA for decision-making at Stage 5.

This proposal only applies to the UKADS provider as change sponsor of an airspace change proposal that covers an area of airspace managed by more than one airport or air navigation service provider. The UKADS provider is expected to resolve design conflicts and interdependencies as part of the development of the airspace change proposal for the relevant area, making independent trade-off decisions where appropriate. We propose that individual change sponsors of linked airspace change proposals (whether coordinated into a cluster or not) would continue to assess environmental impacts on a combined basis at the full and final options appraisals, supporting a more holistic approach to airspace design, where design conflicts and trade-offs are addressed collaboratively.

For the final options appraisal, the UKADS provider would be required to perform a cumulative assessment if the cumulative noise exposure (quantified as enclosed contour area) for two or more airports at and above the lowest observed adverse effect level (LOAEL, i.e. 51 dB $L_{Aeq,16h}$ daytime and 45 dB $L_{Aeq,8h}$ night-time), is greater than the sum of the equivalent respective exposures

Once a final system-wide design option has been selected and developed post consultation, a single noise exposure map (contours) for the full system-wide design would be produced. The noise impact would be quantified using TAG based on the population exposure according to the single noise exposure map. This would eliminate the risk of double-counting where there are cumulative impacts. We anticipate that the assessment of the combined impacts of the single system-wide design where there are no cumulative impacts would require a relatively simple collation of the impact assessment outputs from each of the individual local airport designs.

Questions

Question: Do you agree or disagree that the UKADS provider **should** be required to assess the combined impacts of the system-wide design, including any cumulative impacts, in the final options appraisal at Stage 4 instead of Stage 3?

Agree Disagree Unsure

Question: Please tell us why you have responded in this way.

Question: Do you agree or disagree that the assessment of cumulative impacts should be based on $L_{Aeq,16h}$ and $L_{Aeq,8h}$ noise exposure and overflight up to 4,000 feet?

Agree Disagree Unsure

Question: Please tell us why you have responded in this way?

Question: Are there any other metrics you think the UKADS provider should use for the assessment of cumulative impacts? Please specify what metrics.

Proposal 10: Remove reference to 12 weeks as the accepted standard length for permanent airspace change consultations but maintain the requirement for change sponsors to agree with the CAA an appropriate period of consultation

Applicable to: All airspace change proposals

Current process

[CAP 1616f: Guidance on the Airspace Change Process for Permanent Airspace Changes Proposals](#) acknowledges that the duration of the consultation must be proportionate to the scale and impacts of the airspace change proposal and take into account relevant government guidance or best practice. The accepted standard stated in the airspace change proposal guidance is that permanent airspace change consultations should last for 12 weeks, allowing extra time where appropriate. While the CAA may consider a reduced consultation period where a change sponsor provides a strong rationale, the 12 weeks standard is used as the starting point for change sponsors to propose to scale up or down the length of their consultation.

The [Government's Consultation Principles \(2018\)](#) document states that consultation should last for a proportionate amount of time and that the length should be based on the nature and impact of the proposal. Unlike CAP 1616f, it does not specify an accepted standard and there is no reference to a specified number of weeks, meaning that the CAA's process is not aligned to government guidance.

Proposed change

Option 1: Remove reference to 12 weeks as the accepted standard length for permanent airspace change consultations but maintain the requirement for change sponsors to agree with the CAA an appropriate period of consultation (preferred option)

To ensure that [CAP 1616f](#) is aligned with the Government's consultation principles, we propose to remove reference to 12 weeks being the accepted standard within the permanent airspace change process. We would continue to apply proportionality in this area and would consider the proposed timeline and rationale for the length of consultation for any airspace change proposals at the Stage 3 (Consult) gateway when we complete our regulatory assessment of the change sponsor's consultation strategy, as we do now.

When we made this same proposal in our [consultation on CAP 1616 in 2023](#), 52% of respondents wanted to retain the accepted standard of 12 weeks for consultation, 35% wanted to remove it and 13% were unsure. Following analysis of the responses, we decided to retain the accepted standard of 12 weeks in CAP 1616: edition 5. However, by retaining the reference to 12 weeks, our guidance is not aligned to the Government's consultation guidance and all regulators have been asked by government to support growth by establishing a regulatory system that is targeted and proportionate.

The removal of the reference to 12 weeks, would allow change sponsors to propose the appropriate length of consultation, proportionate to their stakeholders' needs and the expected impacts of their proposal. This would provide more opportunities to apply a scaled approach to consultation length according to the type, nature, and complexity of each airspace change proposal. Although at present change sponsors can provide a rationale for a shorter or longer consultation period than 12 weeks, it means that the change sponsor is often justifying why they are not consulting for 12 weeks rather than focussing on what length is proportionate to their proposal.

We have taken into account that removing the reference to the accepted standard of consultation being 12 weeks could mean that some change sponsors who are less experienced at conducting consultations would not have a benchmark as a starting point to reflect on what length their consultation may need to be. We consider this can be mitigated by the CAA's guidance on factors to take into account.

Although change sponsors can currently propose a rationale for shorter or longer consultation periods, the absence of a defined consultation duration in the guidance may lead some stakeholders to consider that change sponsors will not consult for a sufficient period to enable stakeholders to properly consider the proposals. This concern would be mitigated as the CAA would still assess the change sponsor's rationale for their length of consultation at the Stage 3 gateway, ensuring the length and consultation strategy proposed was proportionate to the proposed level or complexity of the airspace change proposal.

Option 2: No change, retain the reference to 12 weeks as the accepted standard length for permanent airspace change consultations

We could retain the reference to 12 weeks as the accepted standard length for permanent airspace change consultations. Change sponsors would still be able to propose a shorter or longer consultation length, providing a rationale why the proposed length was proportionate to their particular airspace change proposal. However, this would mean our airspace change guidance would still not align to the Government's consultation principles, or respond to the Government's request to regulators to support growth as it would not help to create a more proportionate approach to airspace change.

Questions

Question: Do you agree or disagree with our preferred option (option 1) to remove reference to 12 weeks being the accepted standard length for permanent airspace change consultation but maintain the requirement for the change sponsor to agree with the CAA an appropriate period of consultation?

Agree Disagree Unsure

Question: Please tell us why you have responded in this way.

Stage 5 – Decide

Proposal 11: Refine and introduce new criteria for convening public evidence sessions

Applicable to: All airspace change proposals

Current process

The change sponsor is responsible for engaging with stakeholders throughout the airspace change process and they must demonstrate to the CAA how the choices they have made relate to the feedback they have received.

There are defined points within the airspace change process where the CAA invites direct feedback from stakeholders. For Level 1 airspace change proposals, the CAA may organise a public evidence session where there is sufficient interest to justify holding one and it is proportionate to do so. The public evidence session gives stakeholders, other than the change sponsor, an opportunity to directly provide the CAA decision-maker with their views on the airspace change proposal, in a public forum.

The public evidence session is attended by the CAA decision-maker and specialist colleagues who work on airspace matters. It is not a legal proceeding with formal rules of evidence, but it is a facilitated evidence-giving session.

The requirements for when a Level 1 airspace change proposal public evidence session should be held are not well defined within CAP 1616. This can lead to uncertainty as to when a public evidence session may be convened.

Proposed change

We propose that the triggers for when a public evidence session is convened should be better defined. We propose the following criteria for convening a public evidence session:

- Level 1 airspace change proposals only, which are highly complex or impactful, or have a high level of public interest to justify a public evidence session, and it is proportionate to do so.

Or

- Level 1 airspace change proposals where the UKADS provider is the change sponsor and there are five or more partners.

By having clear criteria for when a public evidence session would be held, change sponsors and stakeholders would have a clear indication at the start of an airspace change proposal when a public evidence session may be convened. This would enable change sponsors to plan their airspace change proposal timelines and resources to take account of public evidence session requirements when needed.

Questions

Question: Do you agree or disagree that public evidence sessions should be retained for Level 1 airspace change proposals – which are highly complex or impactful, or have a high level of public interest to justify a public evidence session, and it is proportionate to do so?

Agree Disagree Unsure

Question: Please tell us why you have responded in this way.

Question: Do you agree or disagree that public evidence sessions should also apply to all airspace change proposals sponsored by the UKADS provider with five or more partners involved?

Agree Disagree Unsure

Question: Please tell us why you have responded in this way.

Proposal 12: Remove the possibility of publication of draft CAA decisions

Applicable to: All airspace change proposals

Current process

For some Level 1 airspace change proposals, the CAA may publish a draft decision before making a final decision on whether to approve the airspace change. The CAA will publish a draft decision for Level 1 airspace change proposals when it is considered proportionate to do so. For example, we may publish a draft decision for proposals which are highly complex, impactful, or have a high level of public interest.

Our objective for publishing a draft decision for some Level 1 airspace change proposals is to ensure that the final decision is based on accurate information and is as comprehensive, clear and robust as possible. It is not to enable stakeholders to make new representation or to go over material that has already been considered and addressed. The CAA therefore does not consider any representation that could have been made at earlier stages in the process.

We publish the draft decision on the airspace change portal and give stakeholders not less than 28 days to respond. If a draft decision is published, it can add a further eight weeks to the overall airspace change process.

The Secretary of State for Transport has discretion to call-in some airspace change proposals, to make the decision rather than the CAA. This is set out in the [Air Navigation Directions \(2023\)](#). Where an airspace change proposal is subject to a call-in by the Secretary of State, no draft decision is published, this is replaced by a minded-to decision. A minded-to decision provides the CAA opinion on the airspace change proposal to the Secretary of State, as the decision-maker, and contains the same information that would have been contained had it been a final CAA decision.

Publishing a draft decision adds time to the length of the airspace change process, and in certain circumstances the delay may be disproportionate to the benefit of publishing a draft decision. Consequently, we may decide not to publish a draft decision and, in such circumstances, when we publish the final decision, we explain our reason for electing not to publish a draft decision.

Draft CAA decisions for Level 1 airspace change proposals may also mislead stakeholders who think it is an opportunity to highlight concerns to the decision-maker which have or could have been raised at earlier stages of the airspace change process which is not the purpose of publishing the draft decision.

The CAA has not utilised this option since its introduction. It was intended as a means to ensure that we had understood all the information that had been provided to us and to ensure that we did not make factual mistakes in our decisions. Experience to date shows that this has not been an issue and, in our view, the possibility of this step in the process does not add sufficient benefit to the process to justify retaining it.

Proposed change

Option 1: Remove the possibility of publication of draft CAA decisions (preferred option)

We propose to remove the requirement for draft CAA decisions. This would help to streamline the airspace change process.

As the draft decision is not a further opportunity for stakeholders to raise concerns to the CAA, comments stakeholders want to share with the decision-maker would still be able to be raised in the public evidence session ahead of any CAA decision being made. As public evidence sessions and draft decision both relate only to Level 1 airspace change proposals, retaining both may disproportionately extend the airspace change process and to some extent duplicate where representation can be made to the CAA decision-maker.

As set out in Proposal 11, it is proposed that the opportunity to hold a public evidence session would remain for certain Level 1 airspace change proposals, stakeholders would still be able to present their views to the CAA prior to the minded-to or final decision.

Removing the draft CAA decision for Level 1 airspace change proposals would help to streamline the process and reduce regulatory burden by removing a step that adds time to the proposal's timeline.

Option 2: No change, retain the requirement for draft CAA decisions

We could retain the requirement for the CAA to publish a draft decision for Level 1 airspace change proposals when it is considered proportionate to do so. However, this is not our preferred option as it would not help to streamline the airspace change process. There are a limited number of instances in which we might publish a draft decision, and we do not believe that the additional time it adds to the airspace change process is justified by the potential benefits.

Questions

Question: Do you agree or disagree that the draft CAA decision for Level 1 airspace change proposals should be removed (option 1)?

Agree Disagree Unsure

Question: Please tell us why you have responded in this way.

Stage 6 – Implement

Proposal 13: Consolidate Stage 5 - Decide and Stage 6 - Implement

Applicable to: All airspace change proposals

Current process

At Stage 5, once all relevant information from the change sponsor has been received by the CAA, we review and assess the change sponsor's final proposal and decide whether to approve the airspace change proposal.

If the airspace change proposal is approved, the change sponsor moves to Stage 6 – Implement, where the approved airspace change is implemented. The change sponsor must fulfil any conditions or modifications set out in the regulatory decision, finalise and submit aeronautical data to the CAA for validation and update all relevant documentation where needed.

During Stage 6, the change sponsor must monitor the impacts of the change. The change sponsor must continue to engage with stakeholders and consider feedback received regarding the impacts of the implemented airspace change.

The regulatory decision typically includes specific conditions that must be fulfilled by the change sponsor during Stage 6, prior to implementation. These may include, for example, the completion of air traffic controller training or changes to aeronautical charting. Until the conditions required prior to implementation are met, the change sponsor cannot implement the change into the live air traffic system.

Proposed change

If Proposal 14 was taken forward, there would be a change to Stage 6 linked to the provision of stakeholder information around deployments for the UKADS provider sponsored airspace change proposals. Apart from that change, we do not propose to make any changes to the processes required for Stage 6, but we do propose that the current Stage 6 forms part of the current Stage 5 processes.

Given the dependencies between the decision and implementation requirements, it is efficient for the requirements of Stage 6 to be incorporated into the final decision made at Stage 5.

Incorporating Stage 6 requirements into the Stage 5 decision would not only enhance clarity and accountability, but also assist a seamless transition from CAA decision to change sponsor implementation, reducing the risk of delays or non-compliance.

Questions

Question: Do you agree or disagree that Stage 6 – Implement, should be merged into Stage 5 – Decide, retaining the current requirements of Stage 6?

Agree Disagree Unsure

Question: Please tell us why you have responded in this way.

Proposal 14: Outline the information the UKADS provider would be required to provide to stakeholders prior to any individual deployment

Applicable to: the UKADS provider sponsored airspace change proposals

Current process

The change sponsor implements an approved airspace change after the CAA (or where applicable, Secretary of State) decision. The change sponsor must fulfil any conditions or modifications set out in the regulatory decision, finalise and submit aeronautical data to the CAA for validation, and update all relevant documentation where needed before being permitted to implement the change in Stage 6. Generally, the change sponsor implements the approved airspace change proposal into the live air traffic system as a single deployment.

Once implemented, Stage 6 of the airspace change process requires the change sponsor to monitor the impacts of the change (generally over a period of 12 months) and consider feedback received from stakeholders regarding the outcomes of the airspace change. If problems arise, the change sponsor must consider what steps it can take to address those problems within the constraints of the final airspace design.

Due to the scale of change and size of some complex airspace change proposals, it may not be possible for the UKADS provider to safely implement all aspects of an approved airspace change proposal in a single, simultaneous deployment. With the need to maintain the delivery of a real-time ongoing air traffic service, the airspace changes could need to be implemented in a series of deployments. These deployments may need to be phased over a period of years. This could lead to steps being required to safely sequence the deployments for the single airspace change proposal.

Proposed change

We propose that the airspace change guidance for the UKADS provider would outline the information the UKADS provider would be required to provide to stakeholders prior to any individual deployment. We propose this information could be compared to a utility provider

providing information on forthcoming road closures, or information provided ahead of road construction notifying of associated speed restrictions or road closures. We currently consider that the information provided ahead of an individual deployment should clarify the expected impact of the deployment, noting that the full impacts of the approved airspace change proposal will not be realised until all deployments have been implemented.

Partners to the airspace change proposal may be required to assist in this activity including providing information to stakeholders - particularly where the partner has been involved in the consultation. This may also include providing the UKADS provider with updated information on the steps at local levels within the relevant deployments.

While providing updates and information on any deployments to stakeholders would mean greater workload for change sponsors, these updates would enable stakeholders to understand the steps to full implementation of the approved airspace change and temporary impacts they may experience.

Questions

Question: Do you agree or disagree that the guidance should outline the information the UKADS provider would be required to provide to stakeholders prior to an individual deployment?

Agree Disagree Unsure

Question: Please tell us why you have responded in this way.

Question: What information would you want to know or consider a change sponsor should provide before a deployment takes place?

Stage 7 - Post Implementation Review (PIR)

Proposal 15: Remove the post implementation review and replace it with an ongoing airspace performance oversight process

Applicable to: All airspace change proposals

Current process

The post implementation review (PIR) takes place at Stage 7 of the airspace change process. It analyses the impacts of the implemented airspace change to allow the CAA to

determine if the change has, or has not, resulted in the expected impacts and outcomes. It does not assess whether the implemented design continues to meet government policy or the airspace modernisation strategy.

The PIR is not an opportunity to re-run the decision-making process, nor is any request for stakeholder feedback a public consultation.

A PIR is completed for all Level 1 airspace changes proposals but will only be completed for Level 2 and Level 3 airspace changes when the CAA determines that it is proportionate to do so. The change sponsor must analyse the data and stakeholder feedback they have collated over the 12 months since the implementation of the airspace change (data collection period) and produce a submission to the CAA of the review data which is published on the airspace change portal. Once published, the CAA opens a feedback window for a period of not less than 28 days, during which stakeholders can provide feedback about whether the impacts of the change are those expected. This feedback window is in addition to any feedback the change sponsor may have received during the evidence collection period since the introduction of the change.

The PIR data collection is undertaken by the change sponsor usually over the 12 months after the change has been implemented to enable data collection to cover seasonal changes in traffic, weather, etc. This snapshot in time does not provide any ongoing review of the airspace or any changes to the overall environment in which the change took place.

CAP 1616 requires the airspace change sponsor, to include in their consultation materials, the extent to which the change is reversible if it does not result in the expected impacts and outcomes. The PIR may determine that the implemented design does not satisfactorily result in the expected impacts and outcomes of the CAA's approval, and modifications are not practicable. In such cases, the change sponsor may be required to revert to the previous airspace design. If the PIR determines that modifications are required to better achieve the expected impacts and outcomes of the CAA's approval, the modifications are implemented and operated for a period (approximately six months).

One of the following outcomes may result from the PIR:

- the CAA may confirm that the implemented airspace change satisfactorily results in – within acceptable tolerance limits - the expected impacts and outcomes of the CAA's approval, and the airspace change is confirmed. No further actions required by the change sponsor
- the CAA may require modifications to the implemented airspace change to better achieve the expected impacts and outcomes of the CAA's approval; once the modifications have been implemented and operated for a period (approximately six months), there are three further possible outcomes:
 - noting that the modifications did not better result in the expected impacts and outcomes of the CAA's approval, the CAA may conclude that the original

design was satisfactory and the original airspace change is confirmed. No further actions required by the change sponsor

- noting that the modifications did not better result in the expected impacts and outcomes of the CAA's approval, the CAA may conclude that the original design was not satisfactory and the original airspace change is not confirmed. In this case, in order to pursue its airspace change, the change sponsor will need to commence a fresh airspace change proposal from Stage 1
- the CAA may conclude that the modifications do better result in – within acceptable tolerance limits – the expected impacts and outcomes of the CAA's approval and so the modified design will be confirmed. No further actions from the change sponsor
- the CAA may determine that the implemented design does not satisfactorily result in the expected impacts and outcomes of the CAA's approval, and modifications are not practicable. In any such case, the change sponsor may be required to revert to the previous airspace design

PIRs are only mandatory for Level 1 airspace change proposals, which are often complex, large-scale airspace change proposals. As such, it would not be possible to instantly revert such airspace to its previous design. If the CAA considered a reversal or modification was necessary, a new airspace change proposal would be required to take this forward.

Any safety issues encountered post implementation of an airspace change are resolved through established safety mechanisms.

The current 12-month PIR data collection period does not enable the CAA or stakeholders to understand if the expected impacts and outcomes continue post the PIR review period. It also does not account for any factors which, over time, might influence the original expected impacts and outcomes.

The current PIR process requires that change sponsors should publish a PIR report following which stakeholders are given 28 days to comment. Removing Stage 7 from the airspace change process would remove the automatic opportunity for this stakeholder feedback 12 months after implementation of the approved change.

Proposed change

Option 1: Remove the PIR and replace it with an ongoing airspace performance oversight process (preferred option)

We propose to remove Stage 7 – PIR and replace it with a new regulatory oversight process, separate from the airspace change process, to monitor the ongoing performance of UK airspace. This new oversight process would enable a performance review programme for UK airspace and would take account of the drivers for delivering the

[airspace modernisation strategy](#) including providing data on the safety and efficiency of UK airspace.

The new regulatory oversight process would monitor the ongoing performance of UK airspace, thereby mitigating the drawbacks of the PIR process identified. Replacing the PIR process with this new regulatory oversight process would help to shorten the airspace change process timeline and reduce resource requirements for the change sponsor, while retaining the benefits of monitoring the impacts post implementation.

Option 2: Change timing of the PIRs and reduce the data collection period

An alternative option to removing PIRs entirely would be to change the timing of the PIRs and reduce the data collection period so it is less than 12 months. This would still provide stakeholders with an opportunity to provide feedback on the impact of the change and allow for data collection but over a shorter time period. This would help to shorten the airspace change process timeline and reduce resource requirements for the change sponsor. This is not our preferred option as it would still create similar issues as in the current PIR process and would not reflect variables across a whole year, for example, changes in weather and traffic levels.

Our preferred option is to remove the PIR from the airspace change process and replace this with a new separate regulatory oversight process. This would enable the ongoing performance of UK airspace to be monitored with an oversight programme which takes account of changes to the overall operating environment across a range of metrics rather than the current inflexible snapshot in time following an airspace change.

Questions

Question: Do you agree or disagree with our preferred option (option 1) to replace post implementation reviews with an oversight process to review the ongoing performance of UK airspace?

Agree Disagree Unsure

Question: Please tell us why you have responded in this way.

Question: If an oversight process were established, do you think it should include a mechanism for stakeholder feedback on the performance of the airspace change?

Yes No Unsure

Question: Please tell us why you have responded in this way.

Question: Do you have any further views on what you would like to see included in a UK airspace oversight review process?

Question: If post implementation reviews continue to be undertaken, do you agree or disagree that the data collection period could be reduced from 12 months following implementation?

Agree Disagree Unsure

Question: Please tell us why you have responded in this way.

DVOR/DME/NDB Rationalisation - RNAV Substitution

Proposal 16: Introduce a proportionate scaled process that enables conventional procedures that have been subject to RNAV Substitution (CAP 1781) and are already operational, to be replicated with fully PBN compliant procedures

Applicable to: A pre-scaled airspace change proposal

Current process

In June 2021, the CAA published a process for DVOR / DME / NDB Rationalisation, including guidance for the use of Area Navigation (RNAV) Substitution ([CAP 1781](#)).

The RNAV Substitution guidance has been developed to enable change sponsors, where Instrument Flight Procedures based on conventional navigation aids (Doppler VHF Omni Range (DVOR), Distance Measuring Equipment (DME) and Non-Directional Beacons (NDB) which are programmed to be removed/decommissioned, to continue to operate traffic along the same track as if the navigation aid was still in operation. The RNAV Substitution guidance only applies where the navigation aid is being removed and does not cover short-term planned or unplanned outages for maintenance or periods of unexpected unserviceability. Alongside CAP 1781, the CAA has developed [CAP 1926](#) as general requirements and guidance to operators and pilots on the use of RNAV Substitution.

The CAP 1781 guidance requires the change sponsor to demonstrate to the CAA that alternative options such as redefining the procedure on another navigation aid (NAVAID), or deleting or truncating the procedure, have been considered prior to making an application to the CAA for the use of RNAV Substitution.

As RNAV Substitution relates to the removal/decommissioning of a single conventional NAVAID and is intended to maintain existing tracks over the ground, the airspace change process followed is currently scaled in accordance with [CAP 1616h: process for Level 3 and pre-scaled airspace change proposals](#). The RNAV Substitution procedures are generally time limited to no longer than 5 years for safety reasons and are designed to provide a bridge to the implementation of a permanent solution.

Proposed change

Since its introduction, CAP 1781 RNAV Substitution has been applied to a number of procedures where the existing conventional instrument flight procedure has been disestablished following the decommissioning/removal of the NAVAID on which it is predicated. However, a number of procedures still need to complete the process to enable continued operations beyond the time where the NAVAID is scheduled for decommissioning/removal in the near-term. We therefore intend to retain the use of CAP 1781 for a period of time for procedures which have already been identified as being retained for safety and operational reasons and where an alternative option such as redefining the procedure on another navigation aid is not viable.

Once completed, we intend to withdraw the use of CAP 1781 as any new or changes to procedures would be required to undertake an airspace change in accordance with a Level 1 CAP 1616 airspace change. CAP 1781 was always designed to be a temporary fix, and a longer-term solution to transition the temporary procedures designed in the CAP 1781 process and make them permanent is required to maintain safety and operational requirements in line with the airspace modernisation strategy.

We therefore propose to introduce a process which enables those procedures which have been subject to CAP 1781 RNAV Substitution to transition to a fully compliant PBN RNAV/RNP procedure, where it can be demonstrated that there are no or negligible changes (as a result of procedures design criteria) to the tracks over the ground flown by aircraft on the existing RNAV Substitution procedure.

Option 1: Any procedure designed under CAP 1781 would need to undertake a Level 1 airspace change under CAP 1616

Any procedure designed under CAP 1781 would need to undertake a Level 1 airspace change under CAP 1616. By undertaking the Level 1 process, the impacts of the proposed procedures on communities and the environment would be formally assessed. As this process would only apply to procedures which have already been designed and aircraft are already flying the CAP 1781 procedures, it is our view that this approach would not be proportionate.

Option 2: Any procedure designed under CAP 1781 would need to undertake a Level 3 airspace change under CAP 1616 (preferred option)

Any procedure designed under CAP 1781 would need to undertake a Level 3 airspace change under CAP 1616. Level 3 airspace change proposals have the potential for low

impact on aviation and non-aviation stakeholders. This would allow for the procedure to undergo a transparent airspace change and for stakeholders to be engaged on the procedures. It allows for the CAA to then ensure that those views are taken into account by the change sponsor before publishing a regulatory decision. We feel that this is a proportionate and balanced approach and enables the transition from RNAV Substitution to a permanent solution in a timely and cost-effective manner.

Questions

Question: Do you agree or disagree with our proposal (option 2) that any procedure designed under CAP 1781 would need to undertake a Level 3 airspace change under CAP 1616?

Agree Disagree Unsure

Question: Please tell us why you have responded in this way.

Beyond Visual Line of Sight (BVLOS)

Proposal 17: Develop a proportionate scaled process within CAP 1616 that would enable the establishment of short-duration volumes of segregated airspace for BVLOS

Applicable to: A pre-scaled airspace change proposal

Current process

There is an increasing demand placed on UK airspace to facilitate the flight of Unmanned Aircraft Systems (UAS), commonly known as drones. There are two ways that drones can be flown, these are:

- **Visual Line of Sight (VLOS)** means the drone pilot can always see the drone with their own eyes at all times during flight, without the use of aids like binoculars.
- **Beyond Visual Line of Sight (BVLOS)** refers to drone operations where the aircraft flies outside the pilot's direct line of sight, often requiring advanced technology and additional regulatory approval to ensure safe operation.

Currently, when drones are flown beyond the pilot's visual line of sight, the technologies required for a drone to detect and avoid other aircraft are not sufficiently developed. Because of this, drones without certified detect and avoid systems require the airspace

they fly in to be segregated. Essentially, this means that nothing else is flying in that airspace volume at the same time as the drone, so the drone cannot collide with another aircraft.

Proposed change

We are seeking views on developing a new process within CAP 1616 that would enable the establishment of short-duration volumes of segregated airspace. This process would:

- enable BVLOS UAS operations of low impact on stakeholders and of short duration
- be activated for up to 24 hours within a 7-day period (allows for weather)
- allow flights between 8 am and 8 pm only
- after the 7-day period the CAA would not approve any other application under this process in the same location for at least 28 days
- only apply outside controlled airspace (CAS) at low level (below 500 feet)
- only apply to drone operations in the Specific Category.

Users of this process would separately be required to complete a [Specific Operations Risk Assessment \(SORA\)](#) as part of their application process for permission to fly the drone(s) (called an Operational Approval). SORA is a structured methodology used in the UK to assess and mitigate the risks associated with drone operations in the Specific Category. It helps operators identify safety objectives, technical and procedural mitigations, and training requirements for their operations. UK SORA is based on the Joint Authorities for Rulemaking on Unmanned Systems (JARUS) framework and is used to determine the Specific Assurance and Integrity Level (SAIL), which reflects the overall risk of an operation and guides the necessary safety measures.

We propose that the SORA generates the line(s) on the map and the buffer(s) required to enable the operations and airspace design to be safely segregated. The CAA would use this information to design and publish an airspace structure. We propose that this would be the only input to the design. Where identified and required, the CAA may undertake limited engagement with impacted aviation stakeholders. We believe that this would be proportionate to the proposed operations given the low impact activity; operations being of no more than 24 hours of flying within a 7-day period and restricted to between the hours of 8 am and 8 pm. Additionally, no further approval for operations in the same location for a minimum of 28 days following cessation of the 7-day period would be granted.

We propose that this proportionate approach to enabling BVLOS flights in the UK is needed to support the [Government's priority](#) of realising the economic growth benefits of new technologies and the joint Department for Transport and CAA future of flight strategy.

Questions

Question: Do you agree or disagree that a process is required in uncontrolled airspace to facilitate low impact and short duration drone flights beyond visual line of sight (BVLOS)?

Agree Disagree Unsure

Question: Please tell us why you have responded in this way.

Question: Do you agree or disagree that the CAA should establish this new process to facilitate this activity?

Agree Disagree Unsure

Question: Please tell us why you have responded in this way.

Chapter 5

Arrangements to migrate to the new airspace change process

Migration policy

The development of more complex airspace change proposals can take several years; therefore, some airspace change proposals will be in progress when we introduce any changes to the airspace change process. We recognise that we are proposing changes to CAP 1616 that could impact change sponsors and their stakeholders currently engaged in the airspace change process. We will therefore need to publish policy on which airspace change proposals would continue on the current process and which would need to switch to the new airspace change process and when this switch would need to occur. However, our decisions on these matters will be influenced by the outcome of this consultation and which proposed amendments to the airspace change process we decide to take forward.

Our policy will seek to balance the benefits of the new policy against the costs of requiring change sponsors and their stakeholders to redo any work.

Our policy will be influenced by the terms and date of coming into force of any revised Air Navigation Directions and Air Navigation Guidance. Any airspace change proposal that remains on the current airspace change process will likely need to be assessed against the provisions of the existing Air Navigation Directions and Air Navigation Guidance. We will therefore need to take into account the views of the Department for Transport on any airspace change proposal in progress that is permitted to remain on the current airspace change process.

We will also publish a process for migrating affected airspace change proposals which are in progress onto any new airspace change process.

As soon as our decision on a revised airspace change process is announced, change sponsors are encouraged to consider what additional actions may be required to align their proposal with any new process.

Questions

Question: Please provide details of any key points you would like us to consider in the migration policy and process to ensure a smooth and efficient migration from CAP 1616: edition 5 to any updated airspace change process.

Final request for views

Questions

Question: Is there anything you think we have overlooked or not considered in these consultation proposals? Please provide details.

Chapter 6

Next steps

What will happen next

Following the end of the consultation period, responses will be analysed. We will consider the results of our analysis and decide what updates should be made to the airspace change process and accompanying guidance.

Simultaneously with this consultation, we are also working on some minor administrative updates to the CAP 1616 process and guidance. This includes, but is not limited to, updates to references, terminology and further clarifications. These updates will also be included in the updated airspace change process and guidance which will be published following this consultation.

We will update the guidance documents to match any revised airspace change process, including providing guidance for complex airspace change proposals sponsored by the UKADS provider. This guidance may include ways to comply with the airspace change process for deployments, partners and steps required following onboarding.

Separate to this consultation, the Department for Transport is expecting to consult on proposed changes to the Air Navigation Directions and Air Navigation Guidance. The CAA's process must implement government policy, which we will discuss with the Government but ultimately the CAA has no control over.

Any resulting changes in government policy on airspace will need to be taken into account in updated airspace change process documentation. We will not know the exact impact of these changes on the airspace change process until the conclusion of the Government's consultation. We will not re-consult on our process unless the Government's policy changes mean the proposals we have consulted on need to be revised in a way that has not been contemplated in this consultation such that we consider we have to re-consult.

Once the airspace change process and guidance is updated, we will publish it and share it via our communication channels. We expect the updated process and guidance to be ready by the end of 2026.

Throughout this review, we remain committed to keeping stakeholders informed and will continue to ensure that our dedicated [review webpage](#) reflects the latest status of the review. All stakeholders are encouraged to monitor this webpage to ensure they keep informed of further development.

ANNEX A

Consultation questions

A1 About you:

Question 1: Are you responding as (please tick):

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

Question 2: If you are a change sponsor or consultancy, what type?

- ☐ Air Navigation Service Provider (ANSP)
- ☐ Airport
- ☐ Space Industry
- ☐ Remotely Piloted Aircraft System
- ☐ Airspace Management / Design Consultancy
- ☐ Approved Procedure Design Organisation
- ☐ Other: please specify _____

Question 3: Where do you live or where is your organisation based?

- ☐ East of England
- ☐ East Midlands
- ☐ West Midlands
- ☐ North East
- ☐ North West
- ☐ Northern Ireland
- ☐ Scotland
- ☐ South East
- ☐ South West
- ☐ Wales
- ☐ Yorkshire and the Humber
- ☐ Outside of the UK

Question 4: Can we publish your response?

- ☐ Yes
- ☐ Publish response anonymous (with the About you answers removed)
- ☐ No

If No, please be aware that, as a public authority, we are bound by the Freedom of Information Act and may therefore be obliged to disclose all of some of the information you provide in accordance with the Freedom of Information Act 2000.

A2 Proposal 1: Reduce, remove or amend Gateways (See Chapter 4, page 24)**Applicable to: All airspace change proposals**

Question 5: Do you agree or disagree with our preferred option (option 3) to introduce a Stage 1/2 milestone check and retain a Stage 3 gateway?

- ☐ Agree
- ☐ Disagree
- ☐ Unsure

Please tell us why you have responded in this way:

Question 6: If you disagree with our preferred option (option 3), what is your preferred option?

- ☐ Option 1: no change
- ☐ Option 2: milestone check
- ☐ Option 4: remove gateways
- ☐ Other: _____

Please tell us why you have responded in this way:

A3 Proposal 2: Define the role of proposer, change sponsor and partner (See Chapter 4, page 27)

Applicable to: All airspace change proposals

Question 7: Do you agree or disagree that a new proposer role is created – who proposes the airspace change and may or may not sponsor the change through the process?

- ☐ Agree
- ☐ Disagree
- ☐ Unsure

Please tell us why you have responded in this way:

Question 8: Do you agree or disagree that at the assessment meeting it should be confirmed who is the proposer and who is the change sponsor?

- ☐ Agree
- ☐ Disagree
- ☐ Unsure

Please tell us why you have responded in this way:

A4 Proposal 3: Create a new set of standard design principles which apply to all airspace change proposals (See Chapter 4, page 30).

Applicable to: All airspace change proposals

Question 9: Do you agree or disagree that the CAA should produce a new set of standard design principles which apply to all airspace change proposals?

- ☐ Agree
- ☐ Disagree
- ☐ Unsure

Please tell us why you have responded in this way:

Question 10: Do you agree or disagree that a change sponsor should engage with relevant stakeholders to consider local issues and local circumstances against the new set of design principles?

- ☐ Agree
- ☐ Disagree
- ☐ Unsure

Please tell us why you have responded in this way:

A5 Proposal 4: Reduce the number of appraisals by removing the initial options appraisal (See Chapter 4, page 32).

Applicable to: All airspace change proposals

Question 11: Do you agree or disagree that the initial options appraisal should be removed from the airspace change process (option 1)?

- ☐ Agree
- ☐ Disagree
- ☐ Unsure

Please tell us why you have responded in this way:

Question 12: Do you agree or disagree that, in Stage 2, the change sponsor should be required to present a high-level description of the methodology they intend to follow to develop the assessments for the full options appraisal?

- ☐ Agree
- ☐ Disagree
- ☐ Unsure

Please tell us why you have responded in this way:

A6 Proposal 5: Combine Stage 1 and Stage 2 of CAP 1616 into a single stage (See Chapter 4, page 35).

Applicable to: All airspace change proposals

Question 13: Do you agree or disagree that Stage 1 and Stage 2 should be combined in one stage?

- ☐ Agree
- ☐ Disagree
- ☐ Unsure

Please tell us why you have responded in this way:

Question 14: Do you agree or disagree with our proposed high-level overview of requirements to retain in a combined Stage 1 and Stage 2?

- ☐ Agree
- ☐ Disagree
- ☐ Unsure

Please tell us why you have responded in this way:

A7 Proposal 6: Remove the requirement for the CAA's assessment of the change sponsor's initial and full options appraisals (See Chapter 4, page 37).

Applicable to: All airspace change proposals

Question 15: Do you agree or disagree that the requirement for the CAA's assessment of the change sponsor's initial and final options appraisals is removed (option 1)?

- ☐ Agree
- ☐ Disagree

- ☐ Unsure

Please tell us why you have responded in this way:

A8 Proposal 7: Reduce the number of metrics in the options appraisal (See Chapter 4, page 39).

Applicable to: All airspace change proposals

Question 16: Do you agree or disagree that the options appraisal should include a shortened list of metrics?

- ☐ Agree
- ☐ Disagree
- ☐ Unsure

Please tell us why you have responded in this way:

Question 17: Do you agree or disagree with the shortened list of metrics we have proposed?

- ☐ Agree
- ☐ Disagree
- ☐ Unsure

Please tell us why you have responded in this way:

Question 18: Are there any other metrics or factors you think should be included in the options appraisal, and if so, why?

A9 Proposal 8: The UKADS provider would perform full and final options appraisals of the system end state against the baseline scenarios (See Chapter 4, page 42).

Applicable to: the UKADS provider sponsored airspace change proposals

Question 19: Do you agree or disagree that the UKADS provider **should** be required to only perform an assessment of the end state design option(s) against the baseline scenarios in the full and final options appraisals – our preferred option?

- ☐ Agree
- ☐ Disagree
- ☐ Unsure

Please tell us why you have responded in this way:

Question 20: Do you agree or disagree that the UKADS provider **should not** be required to quantify and/or monetise each of its deployment stages?

- ☐ Agree
- ☐ Disagree
- ☐ Unsure

Please tell us why you have responded in this way:

Question 21: Do you agree or disagree that year 10 (after implementation with the proposed airspace change) is still an appropriate duration for the appraisal period, given that the deployments within some complex airspace change proposals may span longer or shorter than 10 years?

- ☐ Agree
- ☐ Disagree
- ☐ Unsure

Please tell us why you have responded in this way:

Question 22: If you disagree, what do you think is an appropriate duration for the appraisal period for a complex airspace change proposal implemented in a series of deployments?

A10 Proposal 9: The UKADS provider would assess the combined impacts, including any cumulative impacts, of the system-wide design in the final options appraisal at Stage 4 (See Chapter 4, page 47).

Applicable to: the UKADS provider sponsored airspace change proposals

Question 23: Do you agree or disagree that the UKADS provider should be required to assess the combined system-wide impacts, including any cumulative impacts, in the final options appraisal at Stage 4 instead of Stage 3?

- ☐ Agree
- ☐ Disagree
- ☐ Unsure

Please tell us why you have responded in this way:

Question 24: Do you agree or disagree that the assessment of cumulative impacts should be based on $L_{Aeq,16h}$ and $L_{Aeq,8h}$ noise exposure and overflight up to 4,000 feet?

- ☐ Agree
- ☐ Disagree
- ☐ Unsure

Please tell us why you have responded in this way:

Question 25: Are there any other metrics you think the UKADS provider should use for the assessment of cumulative impacts? Please specify what metrics.

- A11 Proposal 10: Remove reference to 12 weeks as the accepted standard length for permanent airspace change consultations but maintain the requirement for change sponsors to agree with the CAA an appropriate period of consultation (See Chapter 4, page 49).**

Applicable to: All airspace change proposals

Question 26: Do you agree or disagree with our preferred option (option 1) to remove reference to 12 weeks being the accepted standard length for permanent airspace change consultations but maintain the requirement for the change sponsor to agree with the CAA an appropriate period of consultation?

- ☐ Agree
- ☐ Disagree
- ☐ Unsure

Please tell us why you have responded in this way:

- A12 Proposal 11: Refine and introduce new criteria for convening public evidence sessions (See Chapter 4, page 52).**

Applicable to: All airspace change proposals

Question 27: Do you agree or disagree that public evidence sessions should be retained for Level 1 airspace change proposals – which are highly complex or impactful, or have a high level of public interest to justify a public evidence session, and it is proportionate to do so?

- ☐ Agree
- ☐ Disagree
- ☐ Unsure

Please tell us why you have responded in this way:

Question 28: Do you agree or disagree that public evidence sessions should also apply to all airspace change proposals sponsored by the UKADS provider with five or more partners involved?

- ☐ Agree
- ☐ Disagree
- ☐ Unsure

Please tell us why you have responded in this way:

A13 Proposal 12: Remove the possibility of publication of draft CAA decisions (See Chapter 4, page 53).

Applicable to: All airspace change proposals

Question 29: Do you agree or disagree that the draft CAA decision for Level 1 airspace change proposals should be removed (option 1)?

- ☐ Agree
- ☐ Disagree
- ☐ Unsure

Please tell us why you have responded in this way:

A14 Proposal 13: Consolidate Stage 5 – Decide and Stage 6 - Implement (See Chapter 4, page 55).

Applicable to: All airspace change proposals

Question 30: Do you agree or disagree that Stage 6 – Implement, should be merged into Stage 5 – Decide, retaining the current requirements of Stage 6?

- ☐ Agree
- ☐ Disagree

- ☐ Unsure

Please tell us why you have responded in this way:

A15 Proposal 14: Outline the information the UKADS provider would be required to provide to stakeholders prior to any individual deployment (See Chapter 4, page 56).

Applicable to: the UKADS provider sponsored airspace change proposals

Question 31: Do you agree or disagree that the guidance should outline the information the UKADS provider would be required to provide to stakeholders prior to any individual deployment?

- ☐ Agree
- ☐ Disagree
- ☐ Unsure

Please tell us why you have responded in this way:

Question 32: What information would you want to know or consider a change sponsor should provide before a deployment takes place?

:

A16 Proposal 15: Remove the post implementation review and replace it with an airspace performance oversight process (See Chapter 4, page 58).

Applicable to: All airspace change proposals

Question 33: Do you agree or disagree with our preferred option (option 1) to replace post implementation reviews with an oversight process to review the ongoing performance of UK airspace?

- ☐ Agree
- ☐ Disagree
- ☐ Unsure

Please tell us why you have responded in this way:

Question 34: If an oversight process were established, do you think it should include a mechanism for stakeholder feedback on the performance of the airspace change?

- ☐ Agree
- ☐ Disagree
- ☐ Unsure

Please tell us why you have responded in this way:

Question 35: Do you have any further views on what you would like to see included in a UK airspace oversight review process?

Question 36: If post implementation reviews continue to be undertaken, do you agree or disagree that the data collection period could be reduced from 12 months following implementation?

- ☐ Agree
- ☐ Disagree
- ☐ Unsure

Please tell us why you have responded in this way:

A17 **Proposal 16: Introduce a proportionate scaled process that enables conventional procedures that have been subject to RNAV Substitution (CAP 1781) and are already operational, to be replicated with fully Performance-based Navigation (PBN) compliant procedures. (See Chapter 4, page 62).**

Applicable to: A pre-scaled airspace change proposal

Question 37: Do you agree or disagree with our proposal (option 2) that any procedure designed under CAP 1781 would need to undertake a Level 3 airspace change under CAP 1616?

- ☐ Agree
- ☐ Disagree
- ☐ Unsure

Please tell us why you have responded in this way:

A18 Proposal 17: Develop a proportionate scaled process within CAP 1616 that would enable the establishment of short-duration volumes of segregated airspace for BVLOS (See Chapter 4, page 64).

Applicable to: A pre-scaled airspace change proposal

Question 38: Do you agree or disagree that a process is required in uncontrolled airspace to facilitate low impact and short duration drone flights beyond visual line of sight (BVLOS)?

- ☐ Agree
- ☐ Disagree
- ☐ Unsure

Please tell us why you have responded in this way:

Question 39: Do you agree or disagree that the CAA should establish this new process to facilitate this activity?

- ☐ Agree
- ☐ Disagree
- ☐ Unsure

Please tell us why you have responded in this way:

A19 Migration policy: Migration from CAP 1616 edition 5 to edition 6 (See Chapter 5, page 67).

Applicable to: All airspace change proposals

Question 40: Please provide details of any key points you would like us to consider in the migration policy and process to ensure a smooth and efficient migration from CAP 1616: edition 5 to any updated airspace change process.

A20 Final call for views: (See Chapter 5, page 68).

Question 41: Is there anything you think we have overlooked or not considered in these consultation proposals? Please provide details.