

Response ID ANON-622E-FYPT-2

Submitted to Consultation on the airspace change process
Submitted on 2025-12-17 17:45:41

About you

1 Are you responding as:

National representative organisation

Other (please specify what type of respondent you are)::
British Gliding Association

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

Not Answered

Other (please specify)::
We're not.

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

East Midlands

4 Can we publish your response?

Yes

Proposal 1: Reduce, remove or amend Gateways (applicable to all airspace change proposals)

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?

Disagree

Please tell us why you have responded in this way:

Prior to CAP1616, ie under CAP725, many sponsors of ACPs neither sought nor adequately understood the needs of recreational air sport stakeholders. This of course resulted in acrimonious and difficult consultations where sponsors had designed airspace at significant expense only to discover there were significant issues for other airspace users. Naturally, having spent on airspace designs the sponsors were unwilling to materially adjust their designs.

CAP1616 introduced the need for sponsors to effectively engage prior to airspace designs being put forward, with the CAA assessing compliance with that requirement prior to sponsors being able to move forward with airspace designs.

A 'milestone check' is not holding the sponsor accountable for effective engagement prior to proposing designs. This is a loss of utility and protection within the process for airspace stakeholders.

We do not agree with option 3. We propose that gateways should apply at stage 2 and stage 3.

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

Option 1: no change

Please tell us why you have responded in this way:

A gateway at stage 2 and a gateway at stage 3.

Proposal 2: Define the role of proposer, change sponsor and partner (applicable to all airspace change proposals)

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?

Unsure

Please tell us why you have responded in this way:

While it makes sense for large changes with multiple ACPs to potentially have a separate proposer and sponsor, there is a need for a clear line of responsibility and accountability for the proposed airspace change(s).

It is not difficult to envisage how over the several year life-cycle of a multi-ACP change, ACP management and accountability could shift between stakeholders (whether proposer or sponsors) with associated loss of transparency for airspace stakeholders who will have to disentangle the situation to understand the situation and how to engage effectively with the end to end process.

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

Agree

Please tell us why you have responded in this way:

If that is the way forward, it needs to be clear from the start who has what responsibility and accountability.

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

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

Disagree

Please tell us why you have responded in this way:

The design principles may need to vary dependent on the airspace that is potentially impacted and what types of air systems can utilise the airspace. The examples of proposed standard design principles effectively ignore recreational aviation. All airspace users must be accommodated.

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

Please tell us why you have responded in this way:

This question assumes the respondent agrees with question 9.

While we agree that a change sponsor should engage with relevant stakeholders, as seen in question 9, we disagree with standard design principles as seen.

Proposal 4: Reduce the number of appraisals by removing the initial options appraisal (applicable to all airspace change proposals)

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

Unsure

Please tell us why you have responded in this way:

Whilst this proposed change will reduce the qualitative and quantitative indications of impacts at stage 2, an assessment remains possible. However, streamlining the process to presumably reduce effort by the proposer and sponsor does not benefit transparency.

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?

Disagree

Please tell us why you have responded in this way:

'High level' means what? Some detail is required otherwise the process will inevitably evolve into a standard set of methodologies.

Proposal 5: Combine Stage 1 and Stage 2 of CAP 1616 into a single stage (applicable to all airspace change proposals)

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

Agree

Please tell us why you have responded in this way:

Stage 1 has unfortunately already been watered down into a box ticking exercise under the existing CAP1616 process and stage 2 is being manipulated by sponsors (example below).

We can agree to combine the stages. However, to protect stakeholders from sponsors paying lip service to effective engagement, we believe a gateway must be required to complete a combined stages 1 & 2.

Example of stage 2 'manipulation':

Annex 1 para 1.6.6 of the GLA ACP consultation document it states, "The CAA do not permit sponsors to publish draft procedure charts for the proposals however any airlines wishing to see the draft charts, please get in touch via airspace@glasgowairport.com".

How can other airspace stakeholders make informed reasoned comments upon an airspace design when we cannot see the draft procedures that the CAS is designed to protect?

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

Unsure

Please tell us why you have responded in this way:

The example 'could be' bullet points do not include stakeholder engagement on current day scenario and needs in advance of developing design options. 'Local circumstances' (clearly pitched at potential noise/environment feedback) doesn't necessarily address recreational air sport needs.

We believe a gateway must be required to complete a combined stages 1 & 2.

Proposal 6: Remove the requirement for the CAA's assessment of the initial and full options appraisals (applicable to all airspace change proposals)

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

Please tell us why you have responded in this way:

This appears to meet the needs of long term and evolving ACPs.

Proposal 7: Reduce the number of metrics in the options appraisal (applicable to all airspace change proposals)

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

Agree

Please tell us why you have responded in this way:

However, impacts to stakeholders must be transparent.

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

Unsure

Please tell us why you have responded in this way:

'Operational costs' - is that the sponsors costs of airspace users costs?

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

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

Airspace utility e.g. where a volume of airspace is class G and therefore available for all and is subject to an ACP that limits access to the airspace, it should be a requirement to estimate the economic impact on the previous airspace users.

Proposal 8: The UKADS provider would perform full and final options appraisals of the system end state against the baseline scenarios (applicable to all airspace change proposals)

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?

Disagree

Please tell us why you have responded in this way:

The preferred option results in UKADS deciding when it assesses that the sponsor(s) have finally met the baseline requirements. As a result, stakeholders could find themselves exposed to unreasonable outcomes from airspace change for an indefinite period of time. This proposal is focussed on the needs of UKADS rather than those impacted by airspace change.

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

Disagree

Please tell us why you have responded in this way:

To aid transparency and accountability, UKADS should be required to quantify and/or monetise the deployment stages.

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?

Disagree

Please tell us why you have responded in this way:

A rolling appraisal is a more appropriate approach.

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?

If you disagree, what do you think is an appropriate appraisal period for the single airspace change proposal in the London Cluster sponsored by the UKADS provider?:

Appraise at each significant step in the process.

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 (applicable to the UKADS provider sponsored airspace change proposals)

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

Disagree

Please tell us why you have responded in this way:

Whilst the factors that lead the CAA to propose on behalf of UKADS that assessing the combined system-wide impacts should take place a stage 4, there needs to be a method of assessing the impact of an ACP at stage 3 against the current - unchanged - scenario elsewhere in the system as well as later where the system-wide changes have occurred. To do otherwise will risk problems for airspace stakeholders that will remain unaddressed for years.

24 Do you agree or disagree that the assessment of cumulative impacts should be based on LAeq,16h and LAeq,8h noise exposure and overflight up to 4,000 feet?

Unsure

Please tell us why you have responded in this way:

We have no expertise in this area.

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

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

Not sure.

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)

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?

Disagree

Please tell us why you have responded in this way:

Removing the 12 week period will inevitably result in tighter response deadlines for airspace stakeholders.

It appears that CAA is now concerned that the 12 weeks does not align with Govts consultation principles. We suggest that amending to 'a minimum of 12 weeks' is aligned with the Govt principles.

Proposal 11: Refine and introduce new criteria for convening public evidence sessions (applicable to all airspace change proposals)

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

Please tell us why you have responded in this way:

Transparency is important.

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

Please tell us why you have responded in this way:

Again, transparency is important.

Proposal 12: Remove the possibility of publication of draft CAA decisions (applicable to all airspace change proposals)

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

Agree

Please tell us why you have responded in this way:

As far as we're aware, the draft decision option is not used under CAP1616.

Proposal 13: Consolidate Stage 5 – Decide and Stage 6 - Implement (applicable to all airspace change proposals)

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

Unsure

Please tell us why you have responded in this way:

How would this work if the ACP is rejected at the decision stage?

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)

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

Please tell us why you have responded in this way:

However, direction rather than guidance may be appropriate. Sponsors can ignore guidance (they do so now under CAP1616).

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

What information would you want to know before a deployment takes place?:

Airspace access/use and other operational (and therefore economic) impacts and timescales for resolution within the system wide plan.

Proposal 15: Remove the post implementation review and replace it with an airspace performance oversight process (applicable to all airspace change proposals)

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?

Disagree

Please tell us why you have responded in this way:

We strongly disagree with a proposal to remove the PIR stage.

An example of a contentious airspace change will help to explain why. The DSA airspace change that resulted in a disproportionate under-utilised controlled airspace was subject to a PIR that identified the problem and 'proposed' a reduction in CAS. Although the CAA were powerless at that time to

require the change (subsequent to that airport failing revised CAA powers have been established through a change in law), the point is that the problem was identified. A similar excess of CAS was identified following an ACP PIR in Norfolk.

There is no new 'regulatory process' that replaces the PIR or indeed any guarantee that one would be established that would meet stakeholder needs. Therefore the PIR has to remain as an option.

12 months may be a requirement, but it's rarely complied with and sponsors can game the system. An example of holding out until an airport chooses when it feels a PIR will meet its needs is a Farnborough ACP where the PIR was delayed for several years.

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

Please tell us why you have responded in this way:

Vitally important.

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

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

We would want to see the process established in detail prior to removal of the PIR even being considered.

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

Please tell us why you have responded in this way:

Airport sponsors speculatively seek to increase CAS. Drawing the PIR closer to the implementation of the airspace makes sense.

Although outside the scope of this consultation, a further PIR in X years would be of interest and potentially useful to all stakeholders including the airports.

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 (applicable to a pre-scaled airspace change proposal)

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

Please tell us why you have responded in this way:

The proportionate scaled approach needs to recognise that PBN procedures can result in airspace buffers that may not exist prior to a change to PBN, in which case the airspace may need to change and in which case aviation stakeholder engagement and consultation is required.

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)

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)?

Unsure

Please tell us why you have responded in this way:

We are unsure as it is not clear from this consultation whether or not the pre-scaled approach under SORA includes required stakeholder engagement; clearly even operations limited to 500' agl can impact other airspace users.

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

Agree

Please tell us why you have responded in this way:

Please see our response to Q38.

Migration policy: Migration from CAP 1616 version 5 to version 6 (applicable to CAP1616 version 5 airspace change proposals)

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 transition from CAP 1616 edition 5 to any updated airspace change process.

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 transition from CAP 1616: edition 5 to any updated airspace change process.:

Ensure that airspace stakeholders have clarity about which version of CAP1616 applies in each case.

Final call for views

41 Is there anything you think we have overlooked or not considered in these consultation proposals?

Is there anything you think we have overlooked or not considered in these consultation proposals?:

This response was submitted on behalf of the British Gliding Association.

It is in all stakeholders interests to develop safe and efficient airspace through an engaged and transparent process.

In our view, CAP 725 was a flawed process that attracted considerable justified criticism. CAP1616 implemented important improvements.

We recognise that supplier's requirements associated with delivery of the ADS and government pressure are driving proposals to fast-track ACPs. We strongly disagree that the CAA should be bending to those pressures

The airspace above us is a finite national asset. Different aviation users of it have different needs, and some needs impinge on others ability to operate as they'd wish. And non-aviators (those who only fly as airline passengers) want the ability to travel by air but don't want the day-to-day noise when they are on the ground.

Aviation users are many and range from the appropriately highly-regulated world of commercial airlines to the paraglider who just want to jump off a hill climbed with a minimum of fuss or restrictions. The regulation of the former is huge, technical and difficult to understand, even for those who've spent years dealing with its consequences. Even a fully trained air traffic controller needs extensive time and training to become a flight procedure designer. Recreational aviation pilots have their own set of constraints and possibilities ranging from weather and aerodynamics to risk management and out-landings. Mid-air collision is one specific risk, but statistics show that it ranks far below other aviation risks.

There are surprisingly few people who can claim to understand the full spectrum of aviation; and yet arriving at fair designs of airspace, and subsequent balanced decision-making require it. That means that the ongoing constructive interaction of those who understand "their bit", can explain it to others, and listen to and appreciate the "other bits" of aviation in arriving at good proposals is simply vital.

The current system

CAP 1616 was intended to improve transparency and to enforce gateways which could not be passed without achieving certain consultative criteria. While the transparency is welcome the process is bureaucratic and burdensome without necessarily improving the quality of constructive interaction between aviation stakeholders. We have even recently seen CAP1616 being quoted as a reason for not consulting GA during the critical design stage – the very period when collaborative efforts would have been most beneficial.

What we need

What follows is not an attempt at a process design, just a few thoughts and factors that could usefully be incorporated into whatever system we have in future. Several of the factors exist in some sense in CAP1616, but not necessarily in a way that encourages collaborative progress.

With monotonous regularity we see reviews of successful (or more often unsuccessful!) projects come up with a couple of basic but crucial lessons:

1 Get clarity of what is to be achieved and why.

All too often we see "solutioneering" at work. For example one aviation stakeholder decides that it should have more controlled airspace, and proceeds to attempt to enforce this wish on others with ensuing time, cost and confrontation. A more productive approach would have been to call in aviation stakeholders and openly explain why they thought it was important to improve say safety, solicit views on how that might be achieved and start to explore options raised by all. Collaborative thinking could conceivably arrive at different ways of operating or communicating between users which had at least as much positive impact as CAS and could be done immediately without all the effort and cost of an ACP. In a CAP1616 world changing the later discussion on "Design Principles" to an earlier more important one on "Design Objectives" would be particularly beneficial.

Regrettably the current CAP1616 system does not involve other aviation stakeholders in arriving at a "Statement of Need"; it only requires acceptance by the regulator.

2 Get it Right Up Front

All too often construction or design (and thus expenditure) starts too soon, before issues and consequences are understood and agreed. The cost of a design change at the start of a project is minimal; later on it can be catastrophic, whether that is a project such as HS2 or an airspace design that has had costly simulation work done before understanding the impact on other stakeholders – and then claiming that "it's too late/expensive to change afterwards".

A good incentive to collaboration and careful listening would be to provide a short-cut system where changes that were mutually agreed by aviation stakeholders could be fast-tracked. The current system of gateways (which may check for evidence of stakeholder consultation having taken place - rather than its quality or success at reaching consensus) could be adapted. Where aviation stakeholders mutually agreed to a proposal some form of fast tracking would take over. And where there was mutual disagreement the current or a more rigorous process would continue, clearly in the knowledge that the proposal was indeed contentious.

Conclusion

ACP's involve people who need to work together to get something done (the ultimate definition of "a team"). Doing so demands cooperative skills and behaviours of all participants. Putting in place a system that rewards such behaviours by improved mutual understanding and fast tracking might make a

real difference. Whatever the current CAP1616 consultation comes up with should be examined against the above sentiment.

However..

Information gleaned from discussions with ANSPs and the CAA over several months and years ahead of this consultation indicate that the future establishment of UKADS under the only potential (and now agreed) supplier (NATS NERL) is in part predicated on a revised CAP1616 that simplifies the planning process to the benefit of NATS and the airports over and above the needs of other airspace stakeholders. If this is an accurate view and the outcome of the CAA's review of CAP1616, it will be a disappointing missed opportunity.