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AIRSPACE CHANGE PROPOSAL - ACP-2023-033[1]

CAP 1616 DESIGN PRINCIPLES – STAKEHOLDER ENGAGEMENT – TWO WEEK REVIEW

Introduction

On 13 March 2024, the London Oxford Airport CAP1616 Design Principles (DP) Stakeholder Engagement document, which included the requirements for the current operation, was distributed via email and post to over 620 stakeholders with an end date of 24 April 2024. A reminder of the closure date of the Stakeholder Engagement was distributed by email on 18 April 2024.

We have now reviewed the responses received against the proposed draft DPs that were originally issued and following consideration of the comments we have modified the DPs to include one new DP to cover airspace access and to split the environment DP (e) into two separate DPs, one for noise and one for emissions.

We would like you to consider the updated DPs and provide us with any comments by Friday 7 June 2024.

Original Proposed Draft DPs

The proposed draft DPs were contained on page 23 and 24 of the Stakeholder Engagement documentation and were as follows:

Letter	DP	Rationale
	MDP Safety	**The airspace change proposal must maintain a high standard of safety and should seek to enhance current levels of safety.**
a	Provide a safe environment for all airspace users	Provide a safely designed airspace structure to ensure the safe operation of all airspace users. Safety is the highest priority, and the airspace must be as safe or safer than today for all stakeholders that are affected by the airspace change.

[1] Link to CAA Portal

Letter	DP	Rationale
	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.**
b	PANS OPS Compliant Approaches	a. The CAA's published AMS Part 1 (CAP 1711) and Part 2 (CAP 1711A) and any current or future plans associated with it. b. UK Regulation 'Performance-Based Navigation Implementation Rule' 2018/1048 requires an exclusive use of PBN (Article 5) from 6 June 2030 as per Article 7. Aerodromes will, therefore, be required to have RNP approaches with Lateral Navigation (LNAV), LNAV/Vertical Navigation (VNAV) and Localiser Performance with Vertical Guidance (LPV) minima[2].
c	Reduce the Workload on Air Traffic Control (ATC)	ATC vector and sequence aircraft throughout the airspace under the rules of UK Flight Information Services to ensure that aircraft are safely and efficiently routed to/from the Airport. Aircraft that are unknown to Oxford cause increased workload and the potentially for safety events. If we could encourage pilots to be in contact with Oxford and/or have some limited from of protected airspace, this would reduce ATC workload and the reliance on tactical intervention.
d	Comply with any containment requirements	Conform to the CAA's Design of CAS Structures Version 2 dated 12 October 2023 (Policy for the Design of Controlled Airspace Structures SARG126_V2.pdf) where controlled airspace is deemed to be required.
	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**
e	Improved profiles for noise and Carbon dioxide (CO_2)	Aircraft currently arrive from all directions as there are no defined routes to/from Oxford Airport other than for IFR traffic they would be routed to a 6-8 NM final for the required stabilised approach. We should explore the possibility of reducing noise and/or CO_2 where we can. Where lateral and/or vertical changes to existing tracks are required to achieve improved environmental and operational performance, options should: a. Deliver an overall reduction in flight plannable track miles. b. Minimise population numbers newly overflown. c. Avoid overflying the same communities with multiple routes to and from Oxford Airport.
f	Remove dependence from adjacent ATC structures where possible	Use standard airspace structure where possible (conformity, safety, and simplicity) and conform to the principles of the CAA's Policy for the Design of Controlled Airspace Structures Version 2 dated 12 October 2023 (SARG Policy 126) where controlled airspace is deemed to be required.
g	Meet Future Demand	Design should be capable of accommodating and containing new aircraft both operating at the Airport and within the local airspace.
h	Making best use of fleet capabilities	Facilitate design using modern navigational technology.

[2] LPV is part of the Mandated UK Regulation but is not supported in the UK.

Letter	DP	Rationale
i	Consider all aircraft types that operate from the Airport	The Design Principle Improved profiles for noise and CO_2 above could prevent some of the lighter General Aviation aircraft from being able to follow the most efficient routes such that separate routes may have to be considered.

The Stakeholder Engagement period was between 13 March 2024 and 24 April 2024. Most stakeholders chose not to respond. From the responses received:

13 responses requested to be removed from the Stakeholder Engagement.
8 responses had no comment and/or were content as proposed.
19 responses were content with the DPs but suggested ranking changes.
6 responses were very concerned with noise and emissions.
3 responses were concerned about airspace access.
1 response was discounted as it addressed a nearby solar farm only.
1 objected to the ACP based on perceived change of use and the environment.

Many of the responses requested more information about our plans for the airport, options for airspace, and intended tracks over the ground which at this stage of the process we do not know as CAP1616 Stage 1b is primarily about the current operations and the DPs. One aviation stakeholder suggested that the DPs should be limited to consideration of Class E, TMZ and RMZ possibilities. However, the requirement is not known and there should not be any stated limitations; this will be consulted in future stages of the CAP1616 process.

Of those that did respond and who ranked the draft proposed DPs (not all respondents ranked the DPs and some did not rank all of the DPs), the responses to the draft proposed DPs were as follows:

RESPONSES MADE TO THE PROPOSED DPs										
DP Letter:	**Mode [3]:**	**Prefer a**	**Prefer b**	**Prefer c**	**Prefer d**	**Prefer e**	**Prefer f**	**Prefer g**	**Prefer h**	**Prefer i**
a	1	21	0	1	0	0	0	0	0	0
b	2	0	9	3	1	2	4	1	1	0
c	3	0	3	10	2	6	0	1	0	0
d	4	0	1	2	12	0	2	1	1	1
e	5	2	6	0	1	9	1	2	0	1
f	6	0	1	2	0	3	10	3	1	1
g	7	0	0	0	3	0	2	10	2	3
h	8	0	0	1	0	0	1	0	14	4
i	9	0	2	3	2	1	1	2	1	9

[3] The value that occurs most frequently in a given set of data.

According to the Mode average from the responses received that ranked their responses, most responses chose the proposed draft DPs in the ranked order given. However, following analysis of the feedback received, we found some recurring themes that we have considered. Several aviation stakeholders stated that there should be continued GA access to the area as at present. It should be noted that Oxford would not seek to deny access to anybody who asked for access. Indeed, today Oxford encourages pilots to contact Air Traffic Control as 'known' aircraft in communication with Oxford can be managed more efficiently and effectively when compared to unknown aircraft. Any aircraft that requires access to the Aerodrome Traffic Zone today who has no radio, is granted access, where safe to do so, under bespoke letters of agreements or similar arrangements such as a telephone call. However, we recognise that access to airspace and consideration of all airspace users is an issue for some aviator groups; to provide clarity and ensure that designs are measured against a relevant DP, we have agreed to add the following additional DP:

DP: "Consider all aircraft types that operate in the area."

Rationale: "Airspace design should minimise disruption and, to the greatest extent possible, maximise accessibility for all airspace users in accordance with the airspace rules."

One of the main concerns running throughout many of the responders that commented was the environment. A theme amongst several of the non-aviation respondents was a request to separate DP 'e' "Improved profiles for noise and Carbon dioxide (CO2)" into two independent DPs; this we will do as noise and CO2/Emissions.

There was also a comment regarding DP 'a' "Provide a safe environment for all airspace users" in the rationale where the word 'stakeholders' could be taken only those who took part in the 'Stakeholder Engagement". We considered replacing the word 'stakeholders' with 'airspace users' but in internal discussion it was agreed that 'stakeholders' also captured the non-aviation element who might be affected by changes to the airspace structure. We believe that 'stakeholders' captures everyone, so we have decided to keep the rationale wording as it is. An analysis of the Stakeholder Engagement responses is at Annex A.

Following the changes, the updated proposed DPs are as follows (changes in red):

UPDATED PROPOSED DRAFT DPs		
Letter	**DP**	**Rationale**
	MDP Safety	**The airspace change proposal must maintain a high standard of safety and should seek to enhance current levels of safety.**
a	Provide a safe environment for all airspace users	Provide a safely designed airspace structure to ensure the safe operation of all airspace users. Safety is the highest priority, and the airspace must be as safe or safer than today for all stakeholders that are affected by the airspace change.
	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.**
b	PANS OPS Compliant Approaches	a. The CAA's published AMS Part 1 (CAP 1711) and Part 2 (CAP 1711A) and any current or future plans associated with it.

UPDATED PROPOSED DRAFT DPs		
Letter	**DP**	**Rationale**
		b. UK Regulation 'Performance-Based Navigation Implementation Rule' 2018/1048 requires an exclusive use of PBN (Article 5) from 6 June 2030 as per Article 7. Aerodromes will, therefore, be required to have RNP approaches with Lateral Navigation (LNAV), LNAV/Vertical Navigation (VNAV) and Localiser Performance with Vertical Guidance (LPV) minima[4].
b1 (new)	Consider all aircraft types that operate in the area	Airspace design should minimise disruption and, to the greatest extent possible, maximise accessibility for all airspace users in accordance with the airspace rules.
c	Reduce the Workload on Air Traffic Control (ATC)	ATC vector and sequence aircraft throughout the airspace under the rules of UK Flight Information Services to ensure that aircraft are safely and efficiently routed to/from the Airport. Aircraft that are unknown to Oxford cause increased workload and the potentially for safety events. If we could encourage pilots to be in contact with Oxford and/or have some limited from of protected airspace, this would reduce ATC workload and the reliance on tactical intervention.
d	Comply with any containment requirements	Conform to the CAA's Design of CAS Structures Version 2 dated 12 October 2023 (Policy for the Design of Controlled Airspace Structures SARG126_V2.pdf) where controlled airspace is deemed to be required.
	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**
e1 (split)	Improved profiles for noise	Aircraft currently arrive from all directions as there are no defined routes to/from Oxford Airport other than for IFR traffic they would be routed to a 6-8 NM final for the required stabilised approach. We should explore the possibility of reducing noise where we can. Where lateral and/or vertical changes to existing tracks are required to achieve improved environmental and operational performance, options should: a. Deliver an overall reduction in flight plannable track miles. b. Minimise population numbers newly overflown. **c.** Avoid overflying the same communities with multiple routes to and from Oxford Airport.
e2 (split)	Improved profiles for Carbon dioxide (CO_2)/Emissions	Aircraft currently arrive from all directions as there are no defined routes to/from Oxford Airport other than for IFR traffic they would be routed to a 6-8 NM final for the required stabilised approach. We should explore the possibility of reducing CO_2/emissions where we can. Where lateral and/or vertical changes to existing tracks are required to achieve improved environmental and operational performance, options should: a. Deliver an overall reduction in flight plannable track miles.

[4] LPV is part of the Mandated UK Regulation but is not supported in the UK.

UPDATED PROPOSED DRAFT DPs		
Letter	**DP**	**Rationale**
		b. Minimise population numbers newly overflown. **c.** Avoid overflying the same communities with multiple routes to and from Oxford Airport.
f	Remove dependence from adjacent ATC structures where possible	Use standard airspace structure where possible (conformity, safety, and simplicity) and conform to the principles of the CAA's Policy for the Design of Controlled Airspace Structures Version 2 dated 12 October 2023 (SARG Policy 126) where controlled airspace is deemed to be required.
g	Meet Future Demand	Design should be capable of accommodating and containing new aircraft both operating at the Airport and within the local airspace.
h	Making best use of fleet capabilities	Facilitate design using modern navigational technology.
i	Consider all aircraft types that operate from the Airport	The Design Principle Improved profiles for noise and CO2 above could prevent some of the lighter General Aviation aircraft from being able to follow the most efficient routes such that separate routes may have to be considered.

We would be grateful for your comments on the revisions to the proposed draft DPs, preferably by email, by 7 June 2024.

Feedback

All the details of this airspace change proposal are available on the CAA's Airspace Change Portal. The Airspace Change Proposal identification number is ACP-2023-033.

Feedback can be provided in the following ways:

- Email: acp@londonoxfordairport.com
- Letter: Airspace Change Proposal, London Oxford Airport, Langford Lane Kidlington, Oxfordshire, OX5 1RA, United Kingdom

We appreciate feedback in your preferred method. We would be grateful if you could respond even where you have no comment.

Reponses regarding the updated proposed draft Design Principles must be received by 7 June 2024.

ACP Sponsor

Annex

A. Analysis of Comments from Stakeholders on the Proposed Draft DPs.

ANALYSIS OF COMMENTS FROM STAKEHOLDERS ON THE PROPOSED DRAFT DPS

Letter	DP	Rationale	Accept/No Comments	Accept with Changes / Re-order	Request Remove	OASL Comment
	MDP Safety	**The airspace change proposal must maintain a high standard of safety and should seek to enhance current levels of safety.**	**Mandatory Design Principles (MDP) must be included**			
a	Provide a safe environment for all airspace users	Provide a safely designed airspace structure to ensure the safe operation of all airspace users. Safety is the highest priority, and the airspace must be as safe or safer than today for all stakeholders that are affected by the airspace change.	All aviation respondents accept that safety should be the top DP. One Parish Council placed noise and CO2 above safety.	One aviation responder suggested that the word 'stakeholders' could miss someone who had not been involved with the process.		Safety is the priority for all airspace users and there is no intent to differentiate groups of users, everyone is potentially a stakeholder including people on the ground who could be impacted by changes in the airspace. Wording to be retained. This will remain as a DP.
	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.**	**MDPs must be included**			
b	PANS OPS Compliant Approaches	a. The CAA's published AMS Part 1 (CAP 1711) and Part 2 (CAP 1711A) and any current or future plans associated with it. b. UK Regulation 'Performance-Based Navigation Implementation Rule' 2018/1048 requires an exclusive use of PBN (Article 5) from 6 June 2030 as per Article 7. Aerodromes will, therefore, be required to have RNP approaches with Lateral Navigation (LNAV), LNAV/Vertical Navigation (VNAV)				No one challenged the AMS. This will remain as a DP.
			The majority accepted or did not comment on this DP.		Three aviation respondents questioned the 'legal' requirement and suggested the DP should be removed.	We do not agree that this DP should be removed. We believe that the aim of UK Regulation 'Performance-Based Navigation Implementation Rule' 2018/1048 is clear. This together with the requirement within the ICAO GANP and the

Letter	DP	Rationale	Accept/No Comments	Accept with Changes / Re-order	Request Remove	OASL Comment
		and Localiser Performance with Vertical Guidance (LPV) minima[5].				UK AMS to introduce PBN procedures mean it should remain as a DP.
c	Reduce the Workload on Air Traffic Control (ATC)	ATC vector and sequence aircraft throughout the airspace under the rules of UK Flight Information Services to ensure that aircraft are safely and efficiently routed to/from the Airport. Aircraft that are unknown to Oxford cause increased workload and the potentially for safety events. If we could encourage pilots to be in contact with Oxford and/or have some limited from of protected airspace, this would reduce ATC workload and the reliance on tactical intervention.		One respondent wanted this DP placed higher in priority (number 2) but other than a number of respondents wanting this to be reordered - some higher some lower, there were no other comments.		This will remain as a DP.
d	Comply with any containment requirements	Conform to the CAA's Design of CAS Structures Version 2 dated 12 October 2023 (Policy for the Design of Controlled Airspace Structures SARG126_V3.pdf) where controlled airspace is deemed to be required.		Other than a few respondents wanting this to be reordered, there were no comments.		This will remain as a DP.
	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**	**MDPs must be included**			
e	Improved profiles for noise and	Aircraft currently arrive from all directions as there are no defined routes to/from Oxford Airport other	Most aviation group responders were content where noise	Many of the local authorities that responded wanted		The DP will remain in its ranking, but we have agreed to spilt it into a separate DP for

5 LPV is part of the Mandated UK Regulation but is not supported in the UK.

Letter	DP	Rationale	Accept/No Comments	Accept with Changes / Re-order	Request Remove	OASL Comment
	Carbon dioxide (CO_2)	than for IFR traffic they would be routed to a 6-8 NM final for the required stabilised approach. We should explore the possibility of reducing noise and/or CO_2 where we can. Where lateral and/or vertical changes to existing tracks are required to achieve improved environmental and operational performance, options should: a. Deliver an overall reduction in flight plannable track miles. b. Minimise population numbers newly overflown. c. Avoid overflying the same communities with multiple routes to and from Oxford Airport.	and CO2 was ranked.	to place noise and CO2 higher in the ranking order and split the DP into two, one for noise and one for CO2/ Emissions whereas some respondents wanted them ranked lower.		noise and a DP for CO2 (emissions).
f	Remove dependence from adjacent ATC structures where possible	Use standard airspace structure where possible (conformity, safety, and simplicity) and conform to the principles of the CAA's Policy for the Design of Controlled Airspace Structures Version 2 dated 12 October 2023 (SARG Policy 126) where controlled airspace is deemed to be required.		One respondent wanted this placed higher in priority (number 3) and a few respondents wanted this DP to be reordered, some higher some lower, there were no comments.		This will remain as a DP.
g	Meet Future Demand	Design should be capable of accommodating and containing new aircraft both operating at the Airport and within the local airspace.				No specific comments received; this will remain as a DP.
h	Making best use of fleet capabilities	Facilitate design using modern navigational technology.				No specific comments received; this will remain as a DP.

Letter	DP	Rationale	Accept/No Comments	Accept with Changes / Re-order	Request Remove	OASL Comment
i	Consider all aircraft types that operate from the Airport	The Design Principle Improved profiles for noise and CO_2 above could prevent some of the lighter General Aviation aircraft from being able to follow the most efficient routes such that separate routes may have to be considered.	Most respondents were content with this DP.	A few aviation respondents challenged the lack of reference to non-Oxford airport users with the DP statement '*aircraft that operate from the airport*'.		The rationale to the questions within the online response form were within the Stakeholder Engagement document. This explained the rationale for this DP. The relevant text from question 15 states: "*aircraft **types** that operate from the airport".* This DP relates to noise and CO2 and that some of the potential profiles to reduce noise and CO2 could exclude some aircraft. This DP is here as a lens to ensure we consider all aircraft types that fly from the airport – both based-aircraft and visitors to ensure that any changed departure/arrival profiles should take account of all aircraft. This will remain as a DP.