

**LONDON OXFORD AIRPORT AIRSPACE CHANGE PROPOSAL**

**ACP-2023-033<sup>1</sup>**

**GATEWAY DOCUMENTATION:**

**CAP 1616 DESIGN PRINCIPLES STAGE 1 – DEFINE STEP 1B**

**DESIGN PRINCIPLES SUBMISSION DOCUMENT**

**“CURRENT DAY SCENARIO, DESIGN PRINCIPLES AND  
STAKEHOLDER ENGAGEMENT”**



**VERSION 1.0**

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<sup>1</sup> [Link to CAA Portal](#)

**Document Information**

Action	Role	Date
Produce	Airspace Change Proposal Team	13 June 2024
Review	OASL Operations Director	13 June 2024
Approve	OASL Managing Director	13 June 2024

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Version	Date	Change Summary
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# OXFORD AVIATION SERVICES LIMITED AIRSPACE CHANGE PROPOSAL FOR LONDON OXFORD AIRPORT

## STEP 1B

### DESIGN PRINCIPLES

#### Introduction

1. Oxford Aviation Services Ltd (OASL) is the Change Sponsor (CS) for the London Oxford Airport (LOA) Airspace Change Proposal (ACP). This proposal intends to introduce Performance Based Navigation (PBN) procedures to Runway 01 and Runway 19 at the airport together with any required airspace to support the operation. Any changes made would seek to improve safety and efficiency to support the airport's operation whilst maintaining access and services to all airspace users.

2. The purpose of this document is to provide evidence to the Civil Aviation Authority (CAA) that the CS has followed the process laid down in Civil Air Publication (CAP) 1616. The document forms part of the overall requirements for the Stage 1 – Define Gateway, Step 1B – Design Principles (DP).

#### The Airspace Change Process

3. In December 2017, the CAA reformed the airspace change process and introduced CAP1616, guidance on the regulatory process for changing notified airspace design and planned and permanent redistribution of air traffic.

4. The updated fifth edition of CAP1616 was published on 2 January 2024. CAP1616 lays out the regulatory process for changing flight paths, including the community engagement requirements. Proposals for changes to flight paths are submitted to, assessed, and approved by the CAA following the guidance set out in CAP1616.

5. There are seven-stages which provide a framework for changing airspace and CAP1616 places significant importance on engaging a wide range of stakeholders, including potentially affected communities.

6. The CS has engaged with a wide range of potential stakeholders and sought their views on the draft DPs that were proposed. The feedback received has been reviewed and summarised in this document to finalise the DPs that will be used in the development of the Design Options during Stage 2.

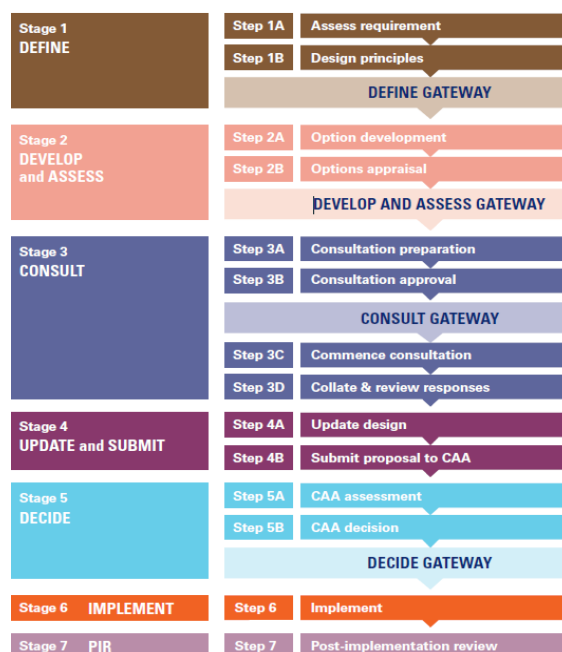


Figure 1: CAP1616 Stages

## Airspace Modernisation at London Oxford Airport

### Step 1A

7. OASL began this Airspace Change Proposal (ACP) in May 2023, with Step 1A “Assess Requirement”, this is where the CS, in this case, OASL, submitted a Statement of Need (SON) to the CAA. The OASL SON V4 for London Oxford Airport can be found at: [Airspace change proposal public view \(caa.co.uk\)](#) within ‘Documents for this proposal’.

8. OASL attended an Assessment Meeting with the CAA on 2 November 2023. Details of the Assessment Meeting, including the presentation provided by OASL and the meeting minutes, can be found on the [CAA Portal, here](#).

9. The Assessment Meeting allowed the change sponsor to discuss with the CAA the issues giving rise to the proposed change, how the change will address those issues, and how the CS intends to proceed. Having been advised that CAA was satisfied with the outcome of the meeting and assigned a provisional Level 1, the minutes and a timeline were published on the portal. This permitted a start to be made on Step 1b with an agreed gateway target of Friday, the 28 June 2024.

### Step 1B

10. This Stage 1 submission document forms OASL’s submission to the CAA for Step 1B ‘Define’ of the CAP1616 process, “Design Principles” and the CAA will decide whether OASL has satisfied Step 1B of the CAP1616 process at the Define Gateway, scheduled for 28 June 2024. The relevant Step 1B documentation must be submitted to the CAA and uploaded to the Airspace Portal by Friday 14 June 2024, two weeks before the Define Gateway date.

11. This document is laid out as follows:

**Section 1 – Stakeholder Engagement.** This section outlines how stakeholders were identified, the engagement methodology and a timeline.

**Section 2 – Current Operations.** This section outlines the current operations, Local Features, European Sites, Relevant Environmental Impacts, Local Contexts, and noise at the airport.

**Section 3 – DP Development.** This section describes the initial draft DPs, summarises the feedback and proposes a final set of DPs.

**Section 4 – Next Steps.** This section provides an outline of the next steps in the ACP process.

**Annex A – List of Stakeholders.**

**Annex B – Stakeholder Engagement Log.**

**Annex C – Stakeholder Engagement Material.** A copy of the Stakeholder Engagement documents distributed to stakeholders, along with the covering emails, and minutes of meetings of the Airport Consultative Committee (ACC), Oxfordshire Regional Airspace User Working Group (RAUWG), the Tenants and Operators Meeting (TOM), the Local Runway Safety Team (LRST), and notes from a Microsoft Teams meeting with the British Gliding Association (BGA) and Light Aircraft Association (LAA).

**Annex C – Stakeholder Feedback Analysis.** Analysis of the correspondence highlighting the rationale for accepting or rejecting feedback from stakeholders and any additional feedback received at this stage.

**Annex D – Raw Stakeholder Feedback.** Stakeholder feedback that was received and sent by the sponsor.

**Annex E – Stakeholder Feedback.** Stakeholder feedback to the first engagement.

**Annex F – Glossary.**

## **Executive Summary**

12. The Change Sponsor conducted stakeholder analysis to ensure that all potential stakeholders were identified and given the opportunity for engagement during the DPs development. Stakeholders were engaged in writing, via a letter distributed by email, and included:

- Members of Parliament
- National Air Traffic Management Advisory Committee (NATMAC) members
- Local Authorities
- Local Airspace Users

13. Engagement began on 3 October 2024 with an Airport Consultative Committee (ACC) meeting (meeting minutes at Annex C). The main Stakeholder Engagement document was issued on 13 March 2024 for a period of six week; it ended on 24 April 2024. A reminder of the closure date of the Stakeholder Engagement was sent out by email on 18 April 2024.

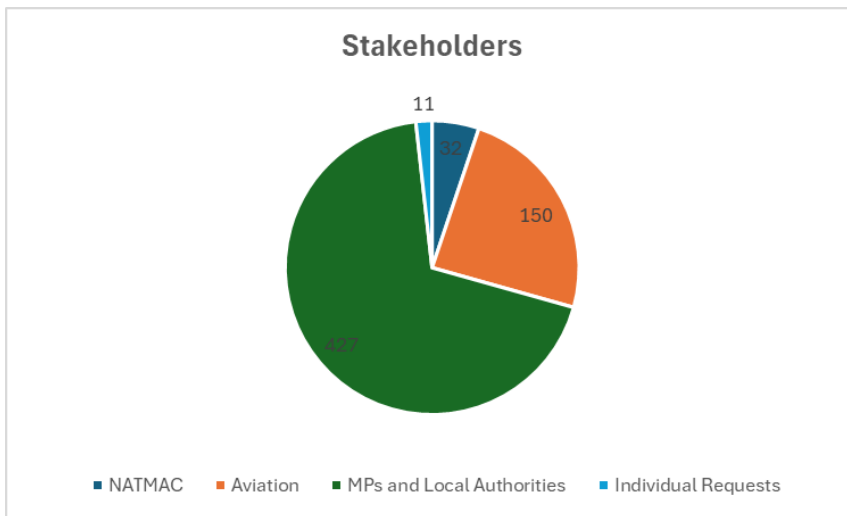
14. There was a relatively low response rate at this stage and some feedback was deemed to fall outside of specific feedback on DPs. The overarching theme from non-aviation stakeholders was concerns over an increase in noise and emissions whereas the aviation stakeholders were concerned about the possibility of the creation of airspace that could reduce airspace availability in what is already a very congested section of Class G. Many stakeholders wanted information on the proposed design of the procedure and airspace that could not be provided at this time, comments would be taken forward into the next stages.

15. As a result of the Stakeholder Engagement, ‘we said, we listened, we did’: one DP was added, and one DP was split into two separate DPs. An updated proposed draft DP list based on stakeholder feedback was sent to stakeholders on 24 May 2024 for a two-week consultation period. A further ACC meeting was held on 4 June 2024 that described the process to date (meeting minutes at Annex C).

16. The final DPs are at Page 20, paragraph 37.

## Section 1 – Stakeholder Engagement

17. On 13 March 2024, the CAP1616 DP Stakeholder Engagement document, which included the requirements for the current operation, was distributed via email and post to over 620 contacts (32 to NATMAC, 150 to Aviation, 427 to MPs, County Councils, District Councils, and Town and Parish Councils, and 11 to individuals who had requested a copy of the Stakeholder Engagement documentation) 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.

### 18. Stakeholder Identification

a. **Geographical Area.** The assumption was made that the proposed airspace change will be within approximately 25NM of London Oxford Airport; it is acknowledged that it may still affect airspace users from across the wider region. For this reason, airspace stakeholders were selected from a geographical area within an approximate 30-mile radius area of the airport. The list was produced from previous engagements, contact details received from the CAA, and internet searches.

b. **Stakeholders.** The ACP team conducted a thorough assessment of all organisations and people with links to London Oxford Airport and identified numerous stakeholders in the geographical area and sent out over 613 documents by email and 7 by post (sent to Parish Councils whose email contact could not be identified). The stakeholders were divided into the following groups:

(1) **Parliamentary Constituencies.** Parliamentary Constituencies within the area were contacted.

(2) **Local Airspace Users.** London Oxford Airport based operators, local airfields, flying groups, and known individuals were contacted.

(3) **Local Authorities.** County Councils, District Councils, Town Councils, and Parish Councils that were within the area were all included in the engagement. Contact details were taken from previous engagement, internet searches, the list available on County Council websites, and online contact portals. Online Parish and Town Councils in Oxfordshire County received direct contact from the ACP team as they lie within the same County. Whilst there was an assumption that the other Counties would cascade information to representatives at an appropriate level as they saw fit, where a Town or Parish Council was known to be below the area, direct contact via email was made.

(4) **NATMAC.** The CAA provided NATMAC member contact details. There was an assumption that NATMAC organisations, as national over-arching

bodies, would cascade information to representatives at an appropriate level as they saw fit. This may have resulted in some stakeholders being contacted twice but reduced the likelihood of the Sponsor not engaging with relevant stakeholders that it may otherwise have inadvertently omitted.

(5) **Additional Stakeholders.** Several local stakeholders, who were informed of the engagement by other stakeholders contacted the ACP team directly and were added to the distribution list for future engagement. Where other potentially affected stakeholders are identified, they will also be included for all future engagement.

## 19. Engagement Methods

### a. Written Communication.

(1) The primary method of engagement in Step 1B was written communication via email. The proposed draft DPs were sent to stakeholders on 13 March 2024 and feedback was requested to be received by 24 April 2024, a period of 6 weeks. Throughout the engagement period, feedback was acknowledged by email, where appropriate, and additional stakeholders that had been made aware of the ACP through NATMAC organisations or other means were added to the Stakeholder Engagement list of stakeholders and a copy of the Stakeholder Engagement documentation was sent to them. Text within the covering email introduced the stakeholders to the ACP, whilst an attached Stakeholder Engagement document explained the requirement for the ACP, the intent, the London Oxford Airport current operation, Local Features, European Sites, Relevant Environmental Impacts and Local Contexts, including Section 106 planning agreements, and then outlined the draft DPs. The document also provided details on how to provide feedback and a link to the CAA's Airspace Change Portal was also provided in the document.

(2) A copy of the Stakeholder Engagement document has been uploaded to the Airspace Portal. All stakeholders were sent a reminder email on 18 April 2024 that gave the Stakeholder Engagement closure date of 24 April 2024.

(3) Following a review of feedback received both in meetings and through correspondence, a second two-week Stakeholder Engagement was distributed to stakeholders on 24 May 2024 to report what we had heard and what we had done. This document included an updated list of proposed draft DPs to be taken forward with a response requested by 7 June 2024.

b. **Presentation to the Oxfordshire RAUWG.** The CS delivered a brief on the London Oxford Airport ACP at the Oxfordshire RAUWG, held on 8 May 2024 at RAF Brize Norton. This provided an opportunity for in-person discussion with local airspace users, the military representatives, and representatives from national aviation organisations on the requirement for the change at London Oxford Airport. There were several questions on the amount of airspace required, which was addressed as unknown at this time, and where the PBN tracks would be, which also could not be provided as this was the DP stage. The Oxfordshire RAUWG minutes have not yet been published but an email confirming the engagement took place is at Annex C.

c. **Meetings.** In the Stakeholder Engagement document sent out to all stakeholders, the offer of face-to-face contact was provided. The BGA and the LAA had a Teams meeting with the airport and consequently the airport has agreed to an

additional DP. It should be noted that their major concern is about potential airspace changes and future access; however, any requirement for airspace structure change is not known at this stage. Most respondents wanted to know about the design and how it would impact them, such that a meeting at this stage would not have addressed the issues and concerns raised. Three meetings were held with the ACC, one with the TOM, one with the LRST, one with the Oxfordshire RAUWG. Notes of meetings can be found at Annex C.

d. **Feedback.** In the documentation sent out, stakeholders were asked to provide feedback in written communication via either Microsoft forms, a word document, email, or letter. However, it was also stated they could provide feedback in their preferred way. All stakeholder correspondence is at Annex D.

e. **Methods Discounted.** It was felt that at this stage in the process there would be little value in holding wider briefing sessions or meetings (online or face-to-face), other than those who specifically requested such a meeting, without having information to share about potential design options. Indeed, many of the responses received during the Stakeholder Engagement wanted to know how it would impact them. It is anticipated that such briefs would be more beneficial during Stage 2 and Stage 3 of the ACP.

f. **Engagement Record Keeping.** When engagement was sent, it was documented. All communication and feedback have been and will continue to be documented.

g. **Engagement Chronology.** The engagement chronology is below:

Date	Engagement	Remarks
10 May 2023	London Oxford Airport Website	Notification of Commencement of ACP
11 May 2023	Step 1A documentation SON V1 published on the CAA ACP portal.	
19 June 2023	Step 1A documentation SON V2 published on the CAA ACP portal.	
21 September 2023	Step 1A documentation SON V3 published on the CAA ACP portal.	
3 October 2024	ACC meeting	Briefed on the ACP
16 November 2023	Step 1A documentation SON V4 published on the CAA ACP portal.	
30 January 2024	ACC meeting	Briefed on the ACP
15 February 2024	TOM meeting	Briefed on the ACP
7 March 2024	LRST meeting	Briefed on the ACP
13 March 2024	London Oxford Airport Website	Notification of Stakeholder Engagement
13 March 2024	Stakeholder Engagement documentation emailed to stakeholders and published on the CAA ACP Portal	6-week Stakeholder Engagement



<b>Date</b>	<b>Engagement</b>	<b>Remarks</b>
07 March 2024	Local Runway Safety Team Meeting Minutes	Oxford Operators Briefing on ACP
18 April 2024	Reminder email sent for end of Stakeholder Engagement	
24 April 2024	First Engagement ended	
08 May 2024	Presentation at the Oxfordshire Regional Airspace User Working Group	Held at RAF Brize Norton
24 May 2024	Updated proposed draft DPs emailed to stakeholders	2-week Stakeholder Engagement for review of amended DPs
31 May 2024	London Oxford Airport Website	Notification of Second Stakeholder Engagement
4 June 2024	ACC meeting	Briefed on the ACP
7 June 2024	Second Engagement ended	
14 June 2024	Stage 1 Gateway Documentation and Checklist sent to the CAA	Redacted Stage 1 Gateway Documentation uploaded onto the Airspace Portal

## Section 2 – Current Operation

### Current Operations, Local Features, European Sites, Relevant Environmental Impacts, Local Contexts and Noise.

20. The Stakeholder Engagement document covers Current Operations, Local Features, European Sites, Relevant Environmental Impacts and Local Contexts within pages 2-21. During the Stakeholder Engagement, a couple of respondents informed us about errors in the information surrounding activity at ‘Enstone Airfield’, ‘Turweston Aerodrome’, and ‘Finmere’ and one minor typo on the paragraph for ‘Oakland Farm Strip’; these errors do not change the overall description of activity within the bullet point on “Other Surrounding Airfields’ at pages 11-13, and this does not impact the Stakeholder Engagement for this phase of the ACP. A question on a downwind join was also made by one responder who felt that this was unusual; however, Oxford does accept such joins.

21. The Stakeholder Engagement document containing the detailed information required within this Section can be found at Annex C, the errors have been corrected (in red in the document at pages 11-13 to highlight the changes made based on the correspondence received).

### Estimated Forecast Traffic Growth over 10 years from the intended year of implementation

22. Since the impact of Covid 19, it is difficult to apply a trend to the airport’s movements as there has been too much variance over the years 2019-2023. There was an increase in movements of +43.6% in 2021 and a further increase of 11.9% in 2022 to 73,780 movements, but in 2023 that number fell by 20.8% to 58,428 movements<sup>2</sup>. Between 1 January 2024 to 31 May 2024, training aircraft movements have increased but Business Aviation has fallen by 3.4% (as it has across the industry), although in May 2024 Business Aviation has increased by 9.2% compared to May 2023; the overall airport increase in movements over this period is about 8.6%. To provide a valid forecast is difficult based on the economic environment as exists in June 2024. However, it is planned that Business Aviation will grow by 6% per annum but all other activity types are not expected to change. For the intended year of implementation of 2026, the estimated forecast traffic growth over the period 2026 to 2036 is as follows:

Type of Activity	Year										
	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036
	0	1	2	3	4	5	6	7	8	9	10
Business Aviation	10,419	11,044	11,707	12,409	13,154	13,943	14,780	15,666	16,606	17,603	18,659
Training	42,944	42,944	42,944	42,944	42,944	42,944	42,944	42,944	42,944	42,944	42,944
AIRBUS	1,086	1,086	1,086	1,086	1,086	1,086	1,086	1,086	1,086	1,086	1,086
Recreational GA	8,669	8,669	8,669	8,669	8,669	8,669	8,669	8,669	8,669	8,669	8,669
Other	204	204	204	204	204	204	204	204	204	204	204
<b>Total</b>	<b>63,322</b>	<b>63,947</b>	<b>64,610</b>	<b>65,312</b>	<b>66,057</b>	<b>66,846</b>	<b>67,683</b>	<b>68,570</b>	<b>69,510</b>	<b>70,506</b>	<b>71,562</b>

### Noise Report

23. The airport has never been required to provide noise report. WSP has been contracted to provide a ‘Stage 1 Current Day – Noise’ report; this report was not included within the Step 1B Engagement Material as the report was only issued on 13 June 2024; however, the ‘Current Operation’ section of the engagement material contained details of noise avoidance and preferred routings that the airport utilises. The ‘London Oxford Airport Airspace Change Proposal ACP-2023-033 Stage 1 Current Day – Noise’ report is at Enclosure 1.

<sup>2</sup> A fall in training aircraft movements was expected as several aircraft from an Oxford based-operator were relocated to Spain.

### Section 3 – DP Development

24. A key building block of this proposal is the development of DPs which can be agreed with stakeholders. This section sets out how, as part of Stage 1 ‘Define’, the CS has followed Step 1B DP together with an explanation of how the final outcome was influenced through the engagement process, DPs should recognise the Airspace Modernisation Strategy (AMS) where necessary. This document and its Annexes demonstrate that the CS has followed CAP1616 Stage 1 ‘Define’, Step 1B DPs to create a list of DPs with an explanation of how these were influenced through the engagement process.

#### Initial Draft DPs – First Stakeholder Engagement

25. The initial draft DPs were informed by CAP1616F Stage 1 ‘Define’ DPs, para 2.38 onwards, agreed internally within the airport and were then distributed within the Stakeholder Engagement documentation, pages 23 and 24; the DPs were as follows (Mandatory DPs (MDP) are in bold):

Letter	DP	Rationale
	<b>MDP Safety</b>	<b>The airspace change proposal must maintain a high standard of safety and should seek to enhance current levels of safety.</b>
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.
	<b>MDP Policy</b>	<b>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>
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 <sup>3</sup> .
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 ( <a href="#">Policy for the Design of Controlled</a>

<sup>3</sup> LPV is part of the Mandated UK Regulation but is not supported in the UK.

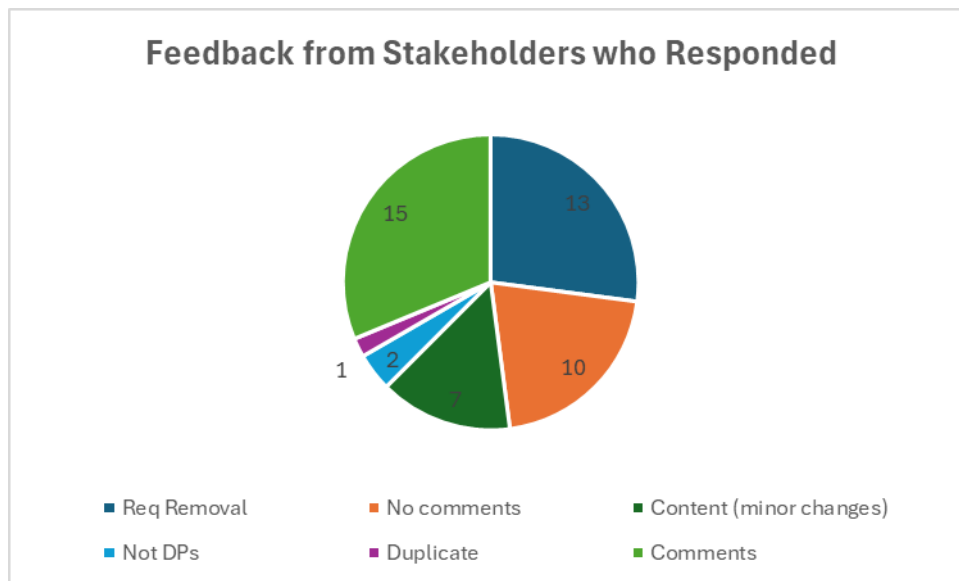
Letter	DP	Rationale
		<a href="#">Airspace Structures SARG126 V3.pdf</a> ) where controlled airspace is deemed to be required.
	<b>MDP Environment</b>	<b>The airspace change proposal should deliver the Government's key environmental objectives with respect to air navigation as set out in the Government's Air Navigation Guidance 2017</b>
e	Improved profiles for noise and Carbon dioxide (CO <sub>2</sub> )	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 <sub>2</sub> where we can. Where lateral and/or vertical changes to existing tracks are required to achieve improved environmental and operational performance, options should: <ul style="list-style-type: none"> <li>a. Deliver an overall reduction in flight plannable track miles.</li> <li>b. Minimise population numbers newly overflown.</li> <li>c. Avoid overflying the same communities with multiple routes to and from Oxford Airport.</li> </ul>
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 ( <a href="#">SARG Policy 126</a> ) 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 CO <sub>2</sub> 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.

## Responses to the First Stakeholder Engagement

26. All comments from stakeholders from the first Stakeholder Engagement were collated and arranged under the relevant draft DPs; individual responses from stakeholders can be found at Annex D. Where it was assessed that a new DP had been proposed, these were listed separately and reviewed. All feedback was reviewed and used in creating this document. Where a change to the draft DP was accepted, this was annotated, and a revised DP was proposed.

27. Most stakeholders (572) did not respond to the first Stakeholder Engagement despite a reminder being sent on 18 April 2024.

28. From the responses received:



- 13 requested to be removed from the Stakeholder Engagement.
- 10 had no comment/were content as proposed.
- 7 were content with the DPs but suggested minor changes.
- 1 was discounted as not addressing the DPs; it addressed a nearby solar farm.
- 1 was a duplicate (email and electronic online form).
- 15 had comments.

29. 23 Stakeholders ranked the DPs (some only ranked some of the DPs and one only one DP). Of those responses that ranked the DPs, the responses to the draft DPs were as follows:

RESPONSES MADE TO THE PROPOSED DPs										
DP Letter:	Mode <sup>4</sup> :	Count 1 'a'	Count 2 'b'	Count 3 'c'	Count 4 'd'	Count 5 'e'	Count 6 'f'	Count 7 'g'	Count 8 'h'	Count 9 '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

<sup>4</sup> The value that occurs most frequently in a given set of data.

Although the overall ‘count’ of the choices made for each DP showed a spread of choices, with more selecting certain DPs, most responses were for the draft DPs in the order as proposed (based on the ‘Mode’). Following analysis of the feedback received, we found some recurring themes, with many responses requesting more information about our options and plans for tracks over the ground which at this stage we do not know as Step 1B is only about the DPs.

30. All MDPs would be included and are not reproduced further below as part of the review of the first Stakeholder Engagement responses. The main comments on the DPs are as follows:

<p><b>DP (a). Provide a safe environment for all airspace users</b></p> <p>The requirement for a safe operating environment as a DP was only contested by two Parish Councils who wanted noise and emissions placed at the top of the table during the Stage 1 engagement, and one group “<i>One Planet Abingdon Climate Emergency Centre</i>” who were concerned about “<i>how the inflated level of greenhouse gases in the atmosphere will be addressed in the next few years so that there is a smooth and fair transition to a zero carbon economy/society</i>”. Most respondents agreed that Safety should be top; safety was deemed of high importance, requiring no further explanation.</p> <p>There was also a comment in relation to this DP regarding the rationale where the word ‘stakeholders’ could be taken to be referring to 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.</p> <p><b>Outcome: DP (a) wording remains unchanged</b></p>
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<p><b>DP (b). PANS OPS Compliant Approaches.</b></p> <p>There was one comment made that:</p> <p><i>“Pans Ops compliant should be over-ruled by ensuring Continuous descent approaches are used which dont descent below a 3 degree glidepath (or preferably higher). Many potential conflicts are caused with the current ILS procedure on 19 because aircraft are allowed to descend to 1800ft many miles from the airfield, when they dont need to be below 3500 ft plus in some cases. I cross the approach well north of Upper Heyford around 2000ft where I should be no conflict with the approach, but approaching aircraft are sometimes too low (seen when not flying)”.</i></p> <p>The respondent suggested that all Instrument Approaches should be based on continuous descent approaches, with no descents below a 3-degree glidepath, preferably this should be a steeper glidepath and that all approach fixes should be at or above a continuous 3-degree descent to the runway. Whilst the noise of any design would be considered that could be mitigated potentially by a higher descent profile, the impact on all aircraft that use the procedure would have to be considered in order not to exclude any aircraft type that might wish to fly the procedure. It was our view that any procedure, however, would have to be Pans-Ops compliant hence the DP should remain.</p> <p>Most aviation respondents accepted the requirement for PBN approaches. However, the British Gliding Association (BGA), Oxford Gliding Club (OGC), and the Helicopter Club of Great Britain (HCGB) challenged “<i>the implication made in the consultation document that Oxford Airport is legally required to have RNP approaches with Lateral Navigation (LNAV), LNAV/Vertical Navigation (VNAV) and Localiser Performance with Vertical Guidance (LPV) minima.</i>” OASL does not agree with this interpretation and has responded accordingly to the BGA, OGC, and the HCGB. UK Regulation ‘Performance-Based Navigation Implementation</p>
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Rule' 2018/1048 requires an exclusive use of PBN (Article 5) from 6 June 2030 as per Article 7 and in order to conform to this Regulation, PBN procedures must be provided. It is understood that CAT 1 Instrument Landing System (ILS) may be withdrawn from 2030 such that alternative IFR Approaches are required to enable safety and efficiency; in addition, both International Civil Aviation Organisation (ICAO) and the AMS state that PBN approaches should be implemented at Instrument runways<sup>5</sup>.

**Outcome: DP (b) wording remains unchanged**

**DP (c). Reduce the Workload on Air Traffic Control (ATC).**

One comment was made that *"you are trying to reduce workload on ATC when aircraft are in class G and there are no requirements for ATC"*. This is rejected because if there was no requirement for ATC in Class G, there would be no requirement for UK FIS as it exists today, and the CAA would be unlikely to approve the current operations to take place. The current procedures require the glidepath to be intercepted from below and to then fly the glidepath /descent profile; workload is unlikely to be reduced greatly by keeping aircraft a little higher.

**Outcome: DP (c) wording remains unchanged**

**DP (d). Comply with any containment requirements.**

One respondent stated *"containment criteria should be removed completely this is not required. Many airfields particularly in the US have RNAV/PBN and ILS approaches in class G airspace and at airfields with no ATC at all. The current ILS has no containment either, but is badly drawn allowing aircraft to be too low far from the airfield thus much more likely to be in conflict with other traffic."* This is not accepted, it is a requirement to comply with any containment requirements as part of procedure design, this does not necessarily mean regulated airspace. There were no other comments.

**Outcome: DP (d) wording remains unchanged.**

**DP (e). Improved profiles for noise and Carbon dioxide (CO2).**

Most stakeholders supported DP (e).

Wootton Parish Council wanted *"Improved profiles for noise and carbon dioxide"* as the top, most important DP to the parish only if the proposed airspace change will reduce noise, air pollution and overflying the airspace above the Parish. The Parish Council also asked lots of questions that were not related to DPs. These would be taken forward to the next phases of the CAP1616 process.

Charney Bassett Parish Council requested that noise, pollution, and any increase in air traffic either directly from Oxford users or indirectly from Brize changing their traffic management as a consequence were likely to be of most concern. However, they stated *"Please rank the design principles in the order you think they should be considered"*.

*"One Planet Abingdon Climate Emergency Centre"* were concerned about *"how the inflated level of greenhouse gases in the atmosphere will be addressed in the next few years so that*

<sup>5</sup> As part of the Industry Coordination for the Airspace Modernisation Strategy (ICAMS) #17 Post-meeting update from the CAA:

"The UK has partially incorporated the EU Reg 1028/2018, also known as the PBN IR, as part of the EU-exit legislative process. Only the requirements applicable in 2020 were transposed into UK law and it is now necessary to update the regulation to support the Airspace Modernisation Strategy and align it, when possible, with the European regulation. It is expected that all UK airports will be required to comply with the new UK regulation once it is published, which will have an impact on the ScTMA sponsors.

The publication is scheduled for the end of 2025. However, we are not proposing any significant deviations from the European Regulation, except for the applicability dates, which are now aligned with the AMS (GANP ASBU). Therefore, the impact will be minimal, as the industry has already integrated the use of Performance-based navigation as the primary source of navigation (this is required by the AMS)."

The *"PBN Mandate"* should be referred as *"PBN revised regulation"*.

*there is a smooth and fair transition to a zero-carbon economy/society*". However, most of their points were for the Government to address.

One of the main concerns running throughout many of the responders that commented was the environment. A common 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.

Another stakeholder responded whilst agreeing with this DP that the environment could be protected by keeping aircraft higher for longer. They then discussed vectoring aircraft to join downwind, or to the overhead and then downwind to join the circuit; this is deemed not relevant as aircraft flying under Instrument Flight Rules invariably require an Instrument Approach and very rarely convert to a Visual Approach; the common requirement is for a stabilised approach between 6-8 miles and owing to other traffic in the area this cannot always be achieved.

**Outcome: DP (e). The DP has been split into separate DPs for noise and CO2/Emissions.**

**DP (f). Remove dependence from adjacent ATC structures where possible.**

Whilst several responders commented on "*airspace grab*" and another stated "*should be removed as controlled airspace is not required. In any case this tends to create far too large an area of airspace at low level for modern aircraft operation.*", this DP's rationale refers to standardisation. It is currently not known whether controlled or other types of airspace are required but Oxford is dependent on RAF Brize Norton and this recognises a requirement to align with each other and where a different form of airspace is deemed to be a requirement, to adopt standard structures.

**Outcome: DP (f) wording has remained unchanged.**

**DP (g). Meet Future Demand.**

One respondent suggested that future demand should be appropriate to the local environment around the airport, based on proportionality. Another said that "*future demand should not be considered as it is usually vastly exaggerated. Oxford used to have 200,000 movements for many years, operated with just an ATZ and no problems, its now just over 25% of that, so there would need to be a lot of growth to get back to where you were before. Every few years there are also proposals for commercial passenger services, some start and keep going for a few weeks, none last. So these should not be considered*". This is not accepted as the type of aircraft operating at the airport has changed with more Instrument Flight Rules traffic utilising Instrument Approaches which requires positioning to be outside of the ATZ. The rationale for this DP explained that new aircraft had to be considered. This is because newer aircraft often were not equipped with older navigational tools such as an ADF so an NDB approach could not be flown. By considering future demand we should also consider aircraft equipage.

**Outcome: DP (g) wording remains unchanged.**

**DP (h). Making best use of fleet capabilities.**

There were no specific comments raised against this DP.

**Outcome: DP (h) wording remains unchanged.**

**DP (i). Consider all aircraft types that operate from the Airport.**

An aviation responder commented "*that this DP should refer equally to aircraft that do not operate from the Airport to ensure the these airspace users too are afforded maximum accessibility and minimal disruption with no adverse safety implications for their continued operations in the area*". This was not accepted as the rationale for this DP related to profiles for approaches into the airport not to any other airspace user.



**Outcome: DP (i) wording remains unchanged.**

**Other Points Raised as Consideration as a DP.**

All comments on the draft DPs made through the Stakeholder Engagement together with meetings with various stakeholders were considered. Following an internal review, the draft DPs were reviewed, and some amendments and changes were made based on stakeholder feedback.

The BGA, OGC, the HCGB and several other aviation stakeholders stated that there should be continued GA access to the area as at present. Subject to safety, 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 could not transpond or has no radio could be captured under bespoke letters of agreements or similar arrangements and any aircraft that requires access to the Aerodrome Traffic Zone today who has no radio, is granted access, where safe to do so. 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."

**Outcome: Additional DP added: "Consider all aircraft types that operate in the area".**

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

UPDATED PROPOSED DRAFT DPs		
Letter	DP	Rationale
	<b>MDP Safety</b>	<b>The airspace change proposal must maintain a high standard of safety and should seek to enhance current levels of safety.</b>
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.
	<b>MDP Policy</b>	<b>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>
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. <a href="#">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<sup>6</sup>.</a>

<sup>6</sup> LPV is part of the Mandated UK Regulation but is not supported in the UK.

UPDATED PROPOSED DRAFT DPs		
Letter	DP	Rationale
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	<a href="#">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.</a>
	<b>MDP Environment</b>	<b>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</b>
e1 (split)	Improved profiles for noise	<p>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.</p> <p>Where lateral and/or vertical changes to existing tracks are required to achieve improved environmental and operational performance, options should:</p> <ol style="list-style-type: none"> <li>Deliver an overall reduction in flight plannable track miles.</li> <li>Minimise population numbers newly overflown.</li> <li>Avoid overflying the same communities with multiple routes to and from Oxford Airport.</li> </ol>
e2 (split)	Improved profiles for Carbon dioxide (CO <sub>2</sub> )/Emissions	<p>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<sub>2</sub>/emissions where we can.</p> <p>Where lateral and/or vertical changes to existing tracks are required to achieve improved environmental and operational performance, options should:</p> <ol style="list-style-type: none"> <li>Deliver an overall reduction in flight plannable track miles.</li> <li>Minimise population numbers newly overflown.</li> <li>Avoid overflying the same communities with multiple routes to and from Oxford Airport.</li> </ol>

UPDATED PROPOSED DRAFT DPs		
Letter	DP	Rationale
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 ( <a href="#">SARG Policy 126</a> ) 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.

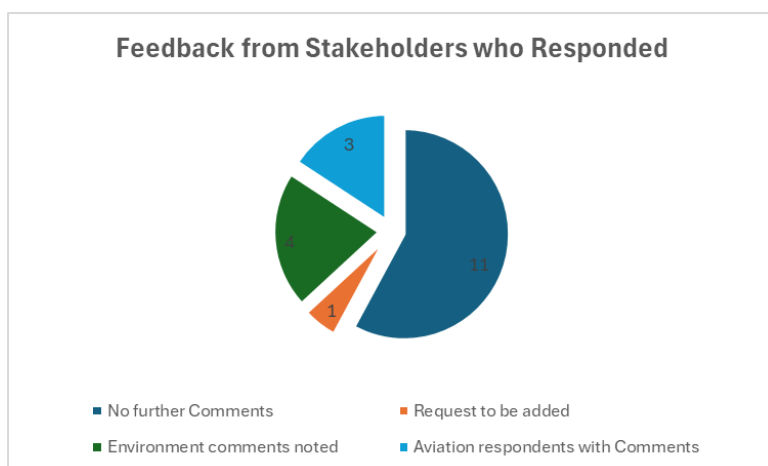
Comments from respondents that had points to make or other DPs they would like considered are at Annex D and OASL feedback on the Stakeholder comments at Annex E.

### Updated Proposed Draft DPs – Second Stakeholder Engagement

32. Following the above proposed changes to the draft DPs, OASL decided to re-engage with stakeholders for a second Stakeholder Engagement to inform stakeholders on what we had heard and what we proposed to change. The same list of stakeholders, excluding those who requested to be removed from the list of stakeholders, was sent the second Stakeholder Engagement document together with any additional stakeholders who had requested to be included. The engagement commenced on 24 May 2024, for a period of two weeks, and ended on 7 June 2024. The document contained feedback on the first Stakeholder Engagement and provided reasons for any changes made to the DPs, see Annex C; this gave stakeholders the opportunity to consider the changes and to make any further comments on the updated proposed draft DPs above.

### Responses to the Second Stakeholder Engagement

33. Most stakeholders did not respond. Of those that did, most stated that they were content or had no further comments at this stage. There were comments from a few respondents that sought refinement of the environmental DPs and one who did not want the environment DPs split, most who commented supported the split though. Two aviation respondents re-stated their opposition to controlled airspace, even though at this stage no designs had been produced; their comments would be taken forward to the next Stage where a workshop covering the options would take place. One respondent suggested that ATC Workload could be reduced by employing more controllers; OASL has already employed more controllers and extended radar



Two aviation respondents re-stated their opposition to controlled airspace, even though at this stage no designs had been produced; their comments would be taken forward to the next Stage where a workshop covering the options would take place. One respondent suggested that ATC Workload could be reduced by employing more controllers; OASL has already employed more controllers and extended radar

hours from 07:30-20:00 Local Time Monday to Sunday to mitigate the workload issues, the unit is not short of its establishment for controllers unlike many other Air Navigation Service Providers.

34. One independent stakeholder stated that his comments had not been considered in the first Stakeholder Engagement; this was not correct, all received correspondence is reviewed and considered. It is recognised that not every comment, especially where it is the only comment, will be included. The individual’s comments from the first Stakeholder Engagement are considered within this document as part of the entirety of the views.

**Evolution of the DPs**

35. There were some comments about lack of prior engagement with some aviation organisations before Step 1B was commenced. This was not an omission, it was planned that this stage of the engagement would be led by existing meetings and through the Stakeholder Engagement process which should have engaged the vast majority of interested parties, particularly aviation through the NATMAC distribution. Whilst some comments did not require a response, others offered new wording for DPs and/or suggested priorities or a new DP. Many of the responses wanted more detail of how the ACP will impact them that will only be available at the next stage and a few respondents wanted some DPs removed. Based on the first Stakeholder Engagement and the mode responses, the original priority order has been retained. Through the process of the first and second Stakeholder Engagement, the DPs have been refined into a final set of DPs.

**Conclusion**

36. There have been lots of questions as to ‘how will this affect me’ and comments such as ‘airspace grab’, where will the ‘overflights’ be, what are the ‘traffic numbers’, where will the ‘lines on a chart’ be, etc. However, as stated within the Stakeholder Engagement documentation, these discussions are only about the DPs in accordance with the CAA’s CAP1616 process. Once Stage 1 ‘Define’ is agreed, the ACP can progress to the design stage during which all stakeholders will again be consulted.

37. Overall, based on the suggestions received, a final set of DPs has been written. The final DPs are as follows:

FINAL DPs		
Letter	DP	Rationale
1	<b>MDP Safety</b>	<b>The airspace change proposal must maintain a high standard of safety and should seek to enhance current levels of safety.</b>
2	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.
3	<b>MDP Policy</b>	<b>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>
4	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. <a href="#">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</a>

FINAL DPs		
Letter	DP	Rationale
		<a href="#">required to have RNP approaches with Lateral Navigation (LNAV), LNAV/Vertical Navigation (VNAV) and Localiser Performance with Vertical Guidance (LPV) minima<sup>7</sup>.</a>
5	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.
6	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 potential for safety events. If we could encourage pilots to be in contact with Oxford and/or have some limited form of protected airspace, this would reduce ATC workload and the reliance on tactical intervention.
7	Comply with any containment requirements	<a href="#">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.</a>
8	<b>MDP Environment</b>	<b>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</b>
9	Improved profiles for noise	<p>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.</p> <p>Where lateral and/or vertical changes to existing tracks are required to achieve improved environmental and operational performance, options should:</p> <ol style="list-style-type: none"> <li>Deliver an overall reduction in flight plannable track miles.</li> <li>Minimise population numbers newly overflowed.</li> <li>Avoid overflying the same communities with multiple routes to and from Oxford Airport.</li> </ol>
10	Improved profiles for Carbon dioxide (CO <sub>2</sub> )/Emissions	<p>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<sub>2</sub>/emissions where we can.</p> <p>Where lateral and/or vertical changes to existing tracks are required to achieve improved environmental and operational performance, options should:</p> <ol style="list-style-type: none"> <li>Deliver an overall reduction in flight plannable track miles.</li> <li>Minimise population numbers newly overflowed.</li> </ol>

<sup>7</sup> LPV is part of the Mandated UK Regulation but is not supported in the UK.

FINAL DPs		
Letter	DP	Rationale
		c. Avoid overflying the same communities with multiple routes to and from Oxford Airport.
11	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 ( <a href="#">SARG Policy 126</a> ) where controlled airspace is deemed to be required.
12	Meet Future Demand	Design should be capable of accommodating and containing new aircraft both operating at the Airport and within the local airspace.
13	Making best use of fleet capabilities	Facilitate design using modern navigational technology.
14	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.

38. The CS believes that the Stage 1 Define has been completed by OASL to the best of abilities and is content with the outcome of the engagement. The final DPs are acceptable and will be used by OASL to inform the process.

39. The CS will ensure that all stakeholders will have further opportunity to comment throughout the ACP process, especially at Stage 2 'Develop and Assess' and Stage 3 'Consult', via correspondence, meetings, and workshops.

OASL  
Change Sponsor

**Enclosure:**

1. WSP "London Oxford Airport AIRSPACE CHANGE PROPOSAL ACP-2023-033 - Stage 1 Current Day – Noise" – Published on 13 June 2024.

**Annexes:**

- A. List of Stakeholders.
- B. Stakeholder Engagement Log.
- C. Stakeholder Engagement Material.
- D. Stakeholder Correspondence.
- E. Stakeholder Feedback.
- F. Glossary.