

Airspace Change Process Post Implementation Review Data Request

ACP Project Reference:	ACP-2020-026					
Title of Airspace Change:	Future Comba	t Airspace				
Change Sponsor:	MOD	MOD				
CAA Decision Document:	Airspace change proposal public view (caa.co.uk)					
CAA Decision Date:	27 Nov 23	27 Nov 23 AIRAC Date(s): 22 Feb 24				
PIR Data Submission Requested:	12 Dec 23	PIR Data Submission Required by ¹ :	22 Mar 25 (1yr post impl +28 days)			

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¹ A 28-day period to collate the data is usually requested, however an extension to the 28-day response period may be granted if sufficiently justified.

Introduction

- 1. The CAA's airspace change process is a seven-stage mechanism that is set out in detail in CAP 1616. Stage 7 of this process is a Post Implementation Review (PIR) that normally begins one year after implementation of the change. The PIR is an assessment of whether the anticipated impacts and benefits in the approved change and published decision are as expected and where there are differences, what steps (if any) the CAA requires to be taken.
- 2. Irrespective of whether the CAA decision to approve the change was made under the previous process (set out in CAP 725), all PIRs should normally be in accordance with the process requirements of CAP1616. However, when assessing the expected impacts against the actual impacts, the methodology adopted at the time of the original CAA decision should be used.
- 3. Once the change sponsor's PIR data submission is published on the portal, there will be a 28-day window during which any stakeholder may provide any feedback when carrying out this review about whether the impacts of the change are those expected, 12 months on.

What does this activity entail?

- 4. Before the CAA can commence the PIR of an airspace change, the change sponsor must provide the CAA with a PIR submission that includes data pre-requested by the CAA. This data would normally be stipulated within the decision document at Stage 5 although this is not the case for changes pre-2018 (CAP 725). This PIR data request form sets out that list of data required in order for the CAA to complete the PIR assessment. If required, the CAA may request data additionally to the data that was requested within the regulatory decision.
- 5. This list is not exhaustive, and some requirements will not apply in every case. Where a data request is required, it will be clearly marked with a cross in the relevant 'Yes' field.

Data requests

- 6. Where the data illustrates impacts other than those anticipated, the change sponsor is to provide (and evidence) their analysis of why this is the case.
- 7. If certain data is unavailable or is disproportionately burdensome to provide, the CAA will consider any justifications explaining the reasons for not providing the data and the CAA may adjust the requirements on this basis. Additionally, the CAA reserves the right to follow up with additional requests for data throughout the review period.
- 8. Any other data that would provide evidence of other benefits or impacts should also be included in an appropriate format.

Format of data

- 9. The format of each data request required will be stipulated below in the associated column.
- 10. Where data is provided to the CAA as part of the change sponsor's PIR submission, it must be in a format that is consistent with, and comparable to, data provided as part of the original consultation and formal ACP, if possible. Scaling of the data should be consistent throughout to enable a likefor-like comparison.
- 11. The PIR submission must be in a suitable format for publishing onto the CAA's Airspace Portal.

Instructions for the Change Sponsors

- 12. The change sponsor is required to commence monitoring and gathering of data on the impacts of the change as soon as the change has been implemented². On receipt of this data request form, the change sponsor should begin to collate the data required, analyse each data request (summarising the conclusions of the analysis), and submit it via email to the assigned AR Project Officer in a Post Implementation Review Submission. The date on which the CAA requires the data to be submitted is stipulated at the top of this document.
- 13. If for any reason, the change sponsor is unable to support this data request at the time requested by the CAA, justification as to why must be submitted to the AR Project Officer. Such requests for a delay in submitting the data must be agreed with the CAA, including an agreement of an appropriate time that this activity can take place.

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² Subject to the impacts of COVID-19 pandemic: <u>Airspace Change Proposals Post-Implementation Reviews (PIRs) impacted by COVID 19 - Update February 2021</u>

General Observations

- 14. The following general observations are to enable an overview of the effectiveness of the airspace change.
- 15. The change sponsor is required to submit a qualitative statement against each data request which supports the conclusion reached in each case.
- 16. The CAA will review the analysis of the data submitted to ensure the anticipated impacts and benefits in the approved change were as expected.

		Required for the review?	Format of the data required.	Information of relevance in support of the request.
a)	An overview statement on whether, in the change sponsor's view, the original proposal met the intended objectives as described on the CAA's decision to approve the change.	Yes⊠	Narrative.	
b)	On overview statement on whether, in the change sponsor's view, the original proposal met any conditions described on the CAA's decision to approve the change (if applicable).	Yes⊠	Narrative.	
c)	Confirm that implementation occurred on the dates identified in the Decision Letter. If no implementation date was specified in the Decision, please state so.	Yes⊠	Narrative.	
d)	If there was a significant delay between the planned and actual implementation date, please provide an explanation.	Yes⊠	Narrative.	
e)	Identify whether any other issues of significance have occurred during the period 12 months after date of implementation ³ .	Yes⊠	Narrative.	
f)	Other than normal promulgation activity (e.g. NOTAM, AIC etc.), identify what steps were undertaken to notify local aviation stakeholders that the airspace change was about to be implemented.	Yes⊠	Narrative.	

³ CAP 1616 Ed 4 Part 1 The Airspace Change Process: Paragraph 270.

Safety Data

- 17. The following safety data is required to enable an assessment that the new airspace design is at least as safe as the original design, if not safer.
- 18. The change sponsor must collate the data requests below, analyse and submit a qualitative statement against each data request which supports the conclusion reached in each case.
- 19. The CAA will review the statistics submitted concerning these events and assess whether the revised airspace design is a contributory factor in any incidents which have occurred. If there have been no reported events, the sponsor should articulate this in their PIR submission.

		Required for the review?	Format of the data required.	Information of relevance in support of the request.
a)	Data concerning any recurring instances of Instrument Flight Procedures (IAPs, SIDs, STARs, Holds) not being flown correctly. ⁴	Yes⊠ No□	Narrative evidenced by data (flight data).	IFPs associated with impacted airports.
b)	Report concerning any known Mandatory Occurrence Reports (MORs).	Yes⊠ No□	Narrative supported by copies of the original MOR Report(s).	Including information relating to relevant Defence Air Safety Occurrence Reports (DASORs).
c)	Report concerning any known AIRPROX reports.	Yes⊠ No□	Narrative supported by copies of the original AIRPROX Report(s).	
d)	Report concerning any known Air Safety Reports (ASR) ⁵ .	Yes⊠ No□	Narrative supported by copies of the original ASR Report(s).	

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⁴ Any instances of IFPs not being flown correctly must be notified to the assigned CAA Project Officer.

⁵This may include relevant reports submitted through CHIRP.

Service provision/ resource issues

- 20. The change sponsor will need to demonstrate that adequate resources are in place to facilitate the operation of the new airspace design, and that air traffic services are being provided as forecast in the approved change without unanticipated negative impact on other airspace users.
- 21. The change sponsor must collate the data requests below, analyse and submit a qualitative statement against each data request which supports the conclusion reached in each case.
- 22. The CAA will assess whether there is adequate resource in place to support the operation comparing the change sponsor's data with the approved change.

		Required for the review?	Format of the data required.	Information of relevance in support of the request.
а)	Data on refusals of service.	Yes⊠ No□	Narrative evidenced by supporting data (table format).	Where this relates to the MOD provision of Air Traffic Services to those civilian flights specified in the Letter of Agreement.
b)	Data regarding air traffic delays.	Yes⊠ No□	Narrative evidenced by supporting data (table format).	
c)	Details of additional resource allocated, considering daily and seasonal traffic patterns.	Yes⊠ No□	Narrative evidenced by supporting data (table format).	

Utilisation of Continuous Climb Operations (CCO) and Continuous Descent Operations (CDO)

- 23. Where the original change cited improvements in CCO/CDO utilisation, the change sponsor will need to provide data to demonstrate any subsequent improvement.
- 24. The change sponsor must collate the data requests below, analyse and submit a qualitative statement against each data request which supports the conclusion reached in each case.
- 25. The CAA will assess whether the anticipated benefit has been delivered by comparing the change sponsor's data against the approved change.

		Required for the review?	Format of the data required.	Information of relevance in support of the request.
a)	The % of traffic achieving CCO and/or CDO, compared monthly before and after the change (e.g. comparing the month of July before and after the change).	Yes□ No⊠	Narrative evidenced by supporting data (flight data).	

Infringement statistics

- 26. Where the revised airspace design changes the dimensions of controlled airspace, the change sponsor will need to provide an analysis of airspace infringements.
- 27. The change sponsor must collate the data requests below, analyse and submit a qualitative statement against each data request which supports the conclusion reached in each case.
- 28. The CAA will assess whether the airspace design was a contributory factor in any increase in infringements⁶. Was an infringement risk identified in the approved change and has it been mitigated?

		Required for the review?	Format of the data required.	Information of relevance in support of the request.
a)	Data on the % change in infringements, compared on a monthly basis before and after the change.	Yes⊠ No□	Narrative evidenced by supporting data (table format).	Relating to impacted airports and en-route CTAs. Information relating to infringements of the Danger Area itself should also be considered in this section.

⁶ A review of any relevant data from the CAA's safety intelligence database will also be conducted.

Traffic figures (air transport movements)

- 29. Traffic figures over the period will give a general overview of the nature of the operation following the implementation of the change. In addition, where the change was predicated on a forecast increase in traffic numbers, the change sponsor will need to confirm whether or not the increase forecast in the approved change has been realised.
- 30. The change sponsor must collate the data requests below, analyse and submit a qualitative statement against each data request which supports the conclusion reached in each case.
- 31. The CAA will consider the extent of any difference between the predicted and actual traffic figures and the extent to which the impacts of the change can be explained by those differences.

		Required for the review?	Format of the data required.	Any information of relevance in support of the request.
a)	Data on the actual vs predicted figures.	Yes⊠ No□	Narrative evidenced by supporting data (table format).	Number and type of aircraft rerouting around the Danger Area.
b)	Data on the % change compared monthly before and after the change.	Yes□ No⊠	Narrative evidenced by supporting data (table format).	
c)	Reconfirmation that there have been no factors that would cause a material change to the traffic forecasts provided in support of the original proposal, i.e. that the original forecasts are still reasonable. ⁷	Yes⊠ No□	Narrative.	Reconfirmation that the Eurocontrol STATFOR and NATS forecasts used in the final proposal are still reasonable when compared to actual traffic figures.

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⁷ Includes the impacts of COVID-19 pandemic.

Traffic dispersion comparisons

- 32. It is necessary to establish whether aircraft are flying routes and/or utilising airspace forecast in the CAA's decision to approve the change. A key part of the CAA's post-implementation review will be to analyse the 'before and after' dispersal of aircraft to understand whether the new airspace design is being operated as anticipated.
- 33. The change sponsor must collate the data requests below, analyse and submit a qualitative statement against each data request which supports the conclusion reached in each case.
- 34. The CAA will assess whether there have been any unforeseen or unintended operational impacts of the approved change.

		Required for the review?	Format of the data required.	Any information of relevance in support of the request.
a)	Density plots that show concentration.	Yes⊠ No⊡	Narrative supported by heat plots showing where aircraft have concentrated within the acceptable tolerances of the procedure design.	Trajectories of aircraft rerouting around the Danger Area. The density plots should be overlaid on the same maps/charts as the lateral vertical plot analysis. The maps/charts should be suitable such that they can be
b)	Lateral and vertical analysis.	Yes⊠ No□	Narrative supported by traffic density plots, that shows aircraft dispersion along with height gained or lost for each plot.	understood by non-aviation stakeholders. The individual lateral plots will be governed by the data. The vertical plots can be colour-coded and broken down into 1000, 2000 or 3000ft swathes depending on the
c)	Weather/MET impacts.	Yes⊠ No□	Should be considered if there was a significant weather event	procedure being considered and can be combined with the individual track plots.
d)	Any changes to operating fleet mix.	Yes□ No⊠	Narrative evidenced by supporting data (table format).	

Operational Feedback

- 35. The change sponsor will have to present any feedback directly received by aviation stakeholders operating in, or affected by, the revised airspace design.
- 36. The change sponsor must collate the data requests below, analyse and submit a qualitative statement against each data request which supports the conclusion reached in each case.
- 37. The CAA will assess whether there have been any unforeseen or unintended operational impacts of the approved change.

		Required for the review?	Format of the data required.	Any information of relevance in support of the request.
a)	Any direct feedback from airlines/ air traffic controllers.	Yes⊠ No□	Narrative supported by a table showing the feed-back in relation to the change and explaining what the change sponsor has done to address the feed-back.	This is not just negative feed-back. The presented format must make it clear that the change sponsor has dealt with the feed-back within the context of the implemented change.
b)	Any additional feedback from relevant flight operation subcommittee (sub-group of airport consultative committee).	Yes⊠ No□	Narrative supported by evidence of minutes or notes of actions from meetings.	

Denied Access

- 38. This links to service provision/resources mentioned above. The change sponsor should provide data on refusals of access to the revised airspace design and any underlying factors.
- 39. The change sponsor must collate the data requests below, analyse and submit a qualitative statement against each data request which supports the conclusion reached in each case.
- 40. The CAA will assess whether other airspace users are being impacted other than as anticipated as a result of the change⁸.

		Required for the review?	Format of the data required.	Any information of relevance in support of the request.
a)	Data concerning the refusals of access (month on month/ before and after the change).	Yes□ No⊠	Narrative evidenced by logged refusals. (table format).	
b)	Reasons for individual refusals of access.	Yes⊠ No□	Narrative evidenced by logged refusals. (table format).	Whilst the Danger Area is not expected to facilitate access to other airspace users, where situations have been reported relating to not being able to access the airspace then the information should be presented.

⁸ A review of any relevant data from the CAA's safety intelligence database will also be conducted.

Utilisation of SIDs/STARs/IAPs

- 41. Information concerning the utilisation of the various procedures implemented as part of the change. The information may highlight areas of unforeseen consequence, for example where a particular procedure is being used more than anticipated with a subsequent impact.
- 42. The change sponsor must collate the data requests below, analyse and submit a qualitative statement against each data request which supports the conclusion reached in each case.
- 43. The CAA will assess whether the utilisation data is other than expected.

		Required for the review?	Format of the data required.	Any information of relevance in support of the request.
a)	Data on the % of flights that actually flew the procedure(s) vs the total number of flights (departing or arriving), compared for the relevant time periods before and after the change.	Yes⊡ No⊠	Narrative evidenced by supporting data (table format).	The utilisation figures must match the figures in the density, lateral and vertical plots in order to see only the aircraft that flew the new procedures; the data would be skewed by VFR departures for example.

Letters of Agreement (LoAs)

- 44. Where a Letter of Agreement detailing specific procedures was a specific condition of the CAA approval, the change sponsor will need to evidence the level of use of that agreement.
- 45. The change sponsor must collate the data requests below, analyse and submit a qualitative statement against each data request which supports the conclusion reached in each case.
- 46. The CAA will assess whether the LoA is being utilised and that it is working as expected.

		Required for the review?	Format of the data required.	Any information of relevance in support of the request.
a)	Evidence of usage of operational agreements between ANSPs and airspace users.	Yes⊠ No□	Narrative.	
b)	Data concerning the activation/ utilisation of LoA procedures.	Yes⊠ No□	Narrative evidenced by supporting data (table format).	

Impact on environmental factors (including noise)

47. Typically, change sponsors will undertake an updated assessment of the environmental impacts that informed the approved change proposal. This updated assessment will be informed by actual flight behaviours following implementation and presented in a comparable format to that used for the change proposal. All updated assessments must be consistent with those presented in the consultation and the submission to the CAA. When using data samples to represent periods of operation, sample periods after implementation must be comparable with any sample periods used before the change.

Depending on the scaling level of the change, updated assessments may include:

- Local air quality
- Noise
- Fuel and CO2 emissions
- Tranquillity
- Biodiversity

The change sponsor will have to either;

- a) Provide supporting evidence to confirm that the impacts presented in the approved airspace change proposal are as anticipated and the conclusions remain unchanged; or
- b) Undertake an updated assessment of the impacts presented in the airspace change proposal using actual data collected post-implementation.
- 48. Should the change sponsor be required to undertake an updated assessment and depending on the scaling level, the change sponsor must collate the data requests below, analyse and submit a qualitative statement against each data request which supports the conclusion reached in each case.
- 49. The CAA will review and assess the change sponsor's assessment and determine the extent to which the CAA agrees.

		Required for the review?	Format of the data required.	Any information of relevance in support of the request.		
Loca	Local Air Quality – required where:					
	there is a change in aviation emiss the location of the emissions is with		· · · · · · · · · · · · · · · · · · ·	feet; and		
a)	Ambient air quality limit concentrations (in µg.m-3).	Yes□ No⊠	Narrative describing impact on AQMA with supporting concentration data (table format).			
b)	TAG Local Air Quality workbook outputs.	Yes□ No⊠	Workbook outputs (table format).			
c)	TAG Air Quality Valuation Workbook outputs.	Yes□ No⊠	Workbook outputs (table format).			
d)	Description of prediction model and version number.	Yes□ No⊠	Narrative.			
e)	Supporting input data (for example movement logs).	Yes□ No⊠	Narrative evidenced by supporting data (table format).			
Nois	se – required where:					
	There is a change which alters lateral aircraft tracks or dispersion, or changes aircraft height, below 7,000 feet (above mean sea level) over an inhabited area (Level 1).					
f)	N60 (night-time) / N65 (daytime) contours.	Yes□ No⊠	Noise contour figures overlaid on Ordnance Survey maps (or similar).			
g)	Leq contours (down to 51 dB LAeq,16h / 45 dB LAeq,8h).	Yes□ No⊠	Noise contour figures overlaid on Ordnance Survey Maps (or similar).			
h)	Leq contour population counts (in thousands), area counts (in km2) and noise sensitive area counts.	Yes□ No⊠	Table format.			
i)	TAG Noise Workbook – Aviation outputs.	Yes□ No⊠	Workbook outputs (table format).			
j)	Operational diagrams (for example, radar track diagrams and track density diagrams).	Yes⊠ No□	Operational diagrams overlaid on Ordnance Survey maps (or similar).	See data collection requirements for 'traffic dispersion comparisons' a) and b).		
k)	Confirmation of CAA CAP 2091 noise modelling category.	Yes□ No⊠	Narrative.			
I)	Description of prediction model and version number.	Yes□ No⊠	Narrative.			
m)	Description of modelling assumptions, for example	Yes□ No⊠	Narrative evidenced by supporting data (table format).			

	modal split, route utilisation and respite.			
n)	Supporting input data (for example movement logs).	Yes□ No⊠	Narrative evidenced by supporting data (table format).	
Fuel	and CO2 emissions:			
0)	Annual fuel and CO2 usage (tCO2).	Yes⊠ No□	Table format.	All information required as part of the ACP approval conditions.
p)	Per flight fuel and CO2 usage (tCO2).	Yes⊠ No□	Table format.	Confirmation that the impacts are as anticipated and presented in the approved proposal (together
q)	TAG Greenhouse Gases Workbook outputs.	Yes⊠ No□	Workbook outputs (table format).	with any necessary supporting evidence) or, a re-assessment of fuel burn and CO2 emissions using DfT's TAG with actual data if
r)	Supporting input data.	Yes⊠ No□	Narrative evidenced by supporting data (table format).	any of the assumptions considered in the assessment as presented in the final submission have changed
s)	Description of prediction model and version number.	Yes⊠ No□	Narrative.	after implementation of the ACP (e.g., number of DA activations). If the anticipated impact for each data request is assessed as positive, a qualitative assessment against each of the required data requests supported by an explanation is adequate (narrative format).
	equillity:			
t)	Operational diagrams clearly identifying AONBs, National Parks, designated quiet areas and noise sensitive areas identified during Stage 1 (1B Design Principles).	Yes□ No⊠	Narrative and Operational diagrams overlaid on Ordnance Survey maps (or similar).	
Biod	liversity:			
u)	Assessment of biodiversity factors including those identified during Stage 1 (Step 1B Design Principles).	Yes□ No⊠	Narrative.	

Impact on International obligations

- 50. The change sponsor will need to demonstrate that any international obligations identified at the time of the change have been discharged.
- 51. The change sponsor must collate the data requests below, analyse and submit a qualitative statement against each data request which supports the conclusion reached in each case.
- 52. The CAA assesses whether the obligations have been met.

		Required for the review?	Format of the data required.	Any information of relevance in support of the request.
а)	Details on any feedback from operators or neighbouring States.	Yes⊠ No□	Narrative.	

Impact on Ministry of Defence operations

- 53. The change sponsor will need to demonstrate that there has been no unforeseen impact on Ministry of Defence operations.
- 54. The change sponsor must collate the data requests below, analyse and submit a qualitative statement against each data request which supports the conclusion reached in each case.
- 55. The CAA assesses whether there has been any unforeseen impact on the Ministry of Defence that would need rectifying.

		Required for the review?	Format of the data required.	Any information of relevance in support of the request.
а)	Details on any feedback from Ministry of Defence.	Yes⊠ No□	Narrative.	Whilst this is an MOD airspace change, information relating to unexpected impacts on broader MOD use of airspace and provision of services may be relevant.

Stakeholder feedback

- 56. Feedback is needed to identify any issues from a community perspective that were not anticipated a part of the approved change; monthly data over the course of a year is needed so that seasonal traffic changes are taken into account.
- 57. The change sponsor must collate the data requests below, analyse and submit a qualitative statement against each data request which supports the conclusion reached in each case.
- 58. A review is made by the CAA of the change sponsors conclusions in identifying any unforeseen or unintended impacts of the change.

		Required for the review?	Format of the data required.	Any information of relevance in support of the request.
a)	Feedback/complaints received by the change sponsor and CAA in the period between implementation and post- implementation review.	Yes⊠ No□	Narrative evidenced by supporting data (table format).	Reference point C, AR Project Officer to liaise with Airspace Classification Team to ascertain applicability.
b)	Details of location of complaints.	Yes⊠ No□	Ordnance Survey map identifying pinned locations.	
c)	Feedback/complaints received via an FCS 1522 Form (UK Airspace Access or Refusal of ATS Report).	Yes⊠ No□	Copies of the FCS 1522 Form relevant to the PIR being conducted.	

Other information of relevance (if appropriate)

		Required for the review?	Format of the data required.	Any information of relevance in support of the request.
a)	Number, timings, and duration of the Danger Area activation.	Yes⊠ No□	Table format.	
b)	Confirmation that there are no impacts to civil traffic patterns below 7,000 ft. beyond those identified in the final submission.	Yes⊠ No□	Narrative evidenced by supporting data (table format).	Analysis of any impacts on local airports (eg Aberdeen, Dundee, Edinburgh, Newcastle and Teesside) and GA activities in the local area.

Airspace Regulation Project Officer
Signed:
Name:
Date: 12/12/2023

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