Northern LTMA Region Airspace Change (OFJES, CLN CTA11/12, FL105+)

Gateway Documentation: **Stage 3 Consult/Engage** Airspace Change Proposal ACP-2025-023

Issue 1.0



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Change History

Issue	Month Year	Change in this issue
Issue 1.0	Sep 2025	Issued

Roles

Action	Role	Date
Produced	Airspace Change Expert Operations Transformation	01/09/2025
Reviewed Approved	Operations Implementation Manager Operations Transformation	01/09/2025
Reviewed Approved	Airspace Concepts Manager Operations Transformation	01/09/2025

Referenced Documents

Ref Num	Name and Link	
1.	Airspace Change Portal ACP-2025-023	<u>Link</u>
2.	Airspace Change Process CAP1616 (main document) and CAP1616f (detailed guidance)	Link to CAP1616 Link to CAP1616f

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1. Introduction

1.1. Airspace change process

- 1.1.1. This document forms part of the document set required in accordance with the requirements of the UK Civil Aviation Authority (CAA) CAP1616 Airspace Change Process (Ref 2).
- 1.1.2. This airspace change proposal (ACP) is a scaled Level 2 For full details of the process requirements, see the assessment meeting minutes and assessment meeting presentation on the CAA's airspace portal page (Ref 1).
- 1.1.3. The change sponsor is NATS En-Route Ltd (NERL) and, presuming approval of this ACP, we intend to implement the change on 19th March 2026 in line with AIRAC 03/2026.
- 1.1.4. This document provides evidence to satisfy the requirements of Stage 3 Consult/Engage from CAP1616f. It explains how we will facilitate effective engagement with relevant stakeholders.

2. Objectives

- 2.1.1. The objectives of the engagement are:
 - to share the design option in its formative stage with relevant stakeholders, informing them of the predicted impacts
 - to obtain their views on the proposal, and consider their feedback in the development of the airspace design
 - to take due regard of ACP scaling opportunities while still ensuring effective two-way engagement occurs with key stakeholders

3. Summary of engagement activity

- 3.1.1. At Stage 1, we identified our key stakeholders as the MoD, and USAF via RAF Lakenheath's radar approach control (RAPCON). Both use DAATM to provide feedback.
- 3.1.2. We drafted Design Principles (DPs) and agreed these with those two key stakeholders via DAATM.
- 3.1.3. At Stage 2, we demonstrated two design options, and engaged with the same key stakeholders.
- 3.1.4. Their feedback, again via DAATM, influenced the DP Evaluation (DPE) and one option was rejected. We now progress a single design option¹.
- 3.1.5. We previously published our Stage 1 and Stage 2 engagement evidence on the CAA's airspace portal page (Ref 1), which together make up the full engagement activity so far.

Engagement date or period	Stakeholder(s)	Activity summary and key points
13/02/2025 and initial response on 07/03/2025	MoD DAATM	Explanation of the issue via slides, two potential design concepts for discussion. Included observed SSR codes within the region, at relevant flight levels. Minutes and slide pack were supplied to all attendees. Initial response was negative, however further discussions were invited.
08/05/2025	MoD DAATM with USAF RAPCON DSATCO rep and UK-USAF liaison	Updated version of the same slide pack for benefit of USAF RAPCON DSATCO. Discussions re: two potential design concepts, one would cause significant adverse impacts on RAPCON operations, the other concept would cause less significant impacts. Additional tech discussions around the concepts. Minutes and slide pack were supplied to all attendees.

Table 1 Summary of pre-engagement activities

¹ See also paragraph 6.1.7 on p.6.

4. Engagement Audience

4.1. Targeted engagement justification

- 4.1.1. At the Assessment Meeting, we discussed with the CAA that part of the scaling for this ACP would be to use targeted engagement rather than formal consultation.
- 4.1.2. Our justification is that there are a limited number of aviation stakeholders with the potential to be impacted by this proposal, we have evidence² to support our expectation that those impacts would be low, and no non-aviation stakeholders are impacted.

4.2. Key Stakeholders

- 4.2.1. Stakeholders where the impact may be greatest will be classified as Key Stakeholders.
- 4.2.2. We will *require* feedback from key stakeholders, as they are assessed to have the most potential impact from this ACP.
- 4.2.3. USAF has close proximity and is a regular user of airspace around/beneath the area of this ACP at high flight levels in the region. Lakenheath Radar Approach Control, known as RAPCON, serves as a combined air traffic services unit (ATSU) for both RAF Lakenheath and RAF Mildenhall. USAF is a key stakeholder.
- 4.2.4. DAATM is the Defence Airspace and Air Traffic Management unit of the MoD. It is a focal point for all aviation matters which may impact military airspace and operations, collecting feedback from all branches of the military which may be impacted, to provide a single response. The MoD is a key stakeholder.
- 4.2.5. Key Stakeholders: MoD and USAF Lakenheath RAPCON, via DAATM.

4.3. Other Stakeholders

- 4.3.1. We categorise Other Stakeholders as potentially having an interest in the change, but less likely to be significantly impacted. These include relevant airports, airlines, relevant General Aviation (GA) airfields, and relevant National Air Traffic Management Advisory Committee (NATMAC) member organisations.
- 4.3.2. We will *invite* feedback from these stakeholders, but we do not *require* it in order to progress the proposal.
- 4.3.3. Relevant Airports
 - The airspace within scope is used by London Luton Airport (LLA) arrivals, therefore LLA will be invited to respond.
 - Cambridge City airport is adjacent and beneath the proposed change to the CTAs, and will be invited to respond.

London Stansted traffic is not impacted, and no other airports are relevant to this proposal.

4.3.4. Relevant Airlines

We identified the proportion of airlines that flight planned to arrive at LLA via OFJES, in the calendar year 2024.

- Wizzair group (Wizzair, Wizzair UK and Wizzair Malta) consisted of 58.8%
- EasyJet consisted of 17.7%
- Ryanair consisted of 7.1%

These three airlines cover 83.6% of LLA arrivals via OFJES, and will be invited to respond. Of the remaining c.16%, the next largest proportion is BCS, part of the DHL cargo group (2.6%), then NetJets (1.6%), El Al (1.5%) and VistaJet (1.1%). All other operators make up fewer than 1% each. We will not invite members of the remaining 16% to respond, however they would be welcome to do so.

² See paragraph 6.1.5 on p.6.

4.3.5. Relevant GA airfields in the region

We drew a 30nm-diameter circle from the centre of the proposed change area, and studied a VFR chart. We looked for GA airfields and gliding sites within Figure 1's blue boundary. We saw there were GA airfields closely adjacent to the west, and included them in an additional blue circle. Combined, this is c.45nm long and 30nm wide.

We did not include farm strips (unlikely to fly high enough to be impacted), heliports (likewise), military airfields (already covered by DAATM), or Cambridge City Airport (previously covered above).

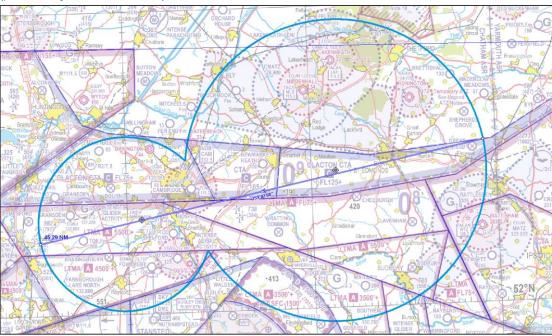


Figure 1 GA airfields in the region, invited to engage

- Powered GA: Duxford (EGSU); Fowlmere (EGMA); Little Gransden (EGMJ)
- Glider GA: Cambridge Gliding Club at Gransden Lodge; Essex Gliding Club at Ridgewell; and Rattlesden Gliding Club in Suffolk

We will invite these six GA airfields to respond.

4.3.6. Relevant NATMAC member organisations

The vast majority of GA occurs below 6,000ft, therefore NATMAC member organisations related to higher-flying GA will be invited to respond. Organisations representing lower-flying airspace users would not be impacted. This means we will not formally invite a response from organisations representing helicopters, microlights, hang-gliders, paragliders, balloons and drones/remotely piloted aerial systems. We will also not formally invite a response from other NATMAC member organisations as they are not relevant to the scope or region of this proposal.

NATMAC member organisations representing the interests of GA which may fly higher than 6,000ft:

- General Aviation Alliance (GAA)
- British Gliding Association (BGA)
- British Business and General Aviation (BBGA)
- PPL/IR Europe
- Light Aircraft Association (LAA)
- British Skydiving
- 4.3.7. Only the organisations listed will be formally invited to request feedback.

 However, **NERL welcomes feedback from any individual or organisation** which believes they may be impacted by this ACP.

5. Approach

5.1. Online presence

5.1.1. Our targeted audience is a limited number of English-speaking aviation stakeholders, all with an online presence. We have previously communicated with most of these stakeholders on other airspace projects.

5.2. Email contact, including a briefing pack

5.2.1. The main channel for communications will be email. We will send an email with a summary of the proposal in the email body. We will also attach a briefing pack, and will offer online group briefings upon request.

5.3. Use of intermediaries

- 5.3.1. We will engage national representative bodies of relevant airspace user groups (see above). We will ask them to respond as that body, but also to raise awareness of the proposed changes to their members who may be impacted.
- 5.3.2. We will engage the GA airfields (see above) and ask them to respond as that body, but also to raise awareness of the proposed changes to pilots using the airfield.

5.4. Successful outcome criterion

5.4.1. As described above in Sections 4.2 and 4.3, this engagement exercise will be deemed successful if we have responses from our key stakeholders. **NERL welcomes feedback from any individual or organisation** which believes they may be impacted by this ACP.

6. Engagement materials

6.1. Taking account of the audience

- 6.1.1. Aviation stakeholders would be expected to understand common aviation terminology, concepts and abbreviations. These would not need explanation within the engagement materials. The language used will be English throughout.
- 6.1.2. The briefing pack will describe the scope of the proposed change, and its drivers.
- 6.1.3. We will ensure that the most up to date and credible sources of data are used in engagement material. This will include the use of the most up to date VFR charts and data sets. No modelling will be conducted.
- 6.1.4. The current-day scenario will be illustrated, the airspace design and usage data for the last 12 months, including an illustration of a sample of radar trajectory data. Operational diagrams will be used to illustrate differences from the current-day arrangements.
- 6.1.5. We will provide an analysis of the occupancy of the design region using SSR, as all flights above FL100 must operate a transponder. This analysis will demonstrate current usage and assist in illustrating the potential impacts to stakeholders.
- 6.1.6. The anticipated % growth of UK traffic between the implementation year and 10 years post will be provided for context and the NATS June 2025 forecast used to calculate this. As the forecast only goes to 2033 at a UK level, 2035 will be extrapolated using the growth rate of 2032 to 2033. As the airspace change is expected to have no impact to traffic levels, further detail is not deemed proportionate.

- 6.1.7. The option rejected at Stage 2 will also be briefly mentioned, including its reasons for rejection.
- 6.1.8. An abridged version of the Stage 2 Consolidated Options Appraisal will be provided, this is a qualitative assessment of the impacts and is scaled as discussed with the CAA during the Assessment Meeting.

6.2. Accessibility and seldom-heard audiences

6.2.1. From an accessibility point of view, assistive technology is readily available, such as audible reading or written translations of online material and documents. Therefore, we will not prepare material in languages other than standard written English, nor are there any seldom-heard stakeholders.

7. Length of engagement period

- 7.1.1. We consider a four-week period of engagement to be appropriate. Our justification is that this is a targeted engagement exercise, to a limited group of professional aviation stakeholders.
- 7.1.2. We will engage from 10am Tuesday 2nd September to 5pm Tuesday 30th September 2025 inclusive, and aim to hold any online briefing calls in the first half of this period if possible.
- 7.1.3. We aim to send a mid-point reminder email to any unresponsive stakeholders, circa Wednesday 17th September or shortly thereafter.
- 7.1.4. This period is after the summer holiday season, and contains no public holidays.

8. Responding to the engagement

- 8.1.1. An online survey using the Microsoft Forms system will be used to capture stakeholder responses to the proposed changes. This link will be included within the briefing pack, and within the email.
- 8.1.2. Responses to the email itself will be accepted *in lieu* of completing the online form.
- 8.1.3. There will be no provision for paper/postal responses, and requests for paper copies of the engagement material will be denied, the requestor will be directed to use the supplied electronic material.

9. Unexpected events

9.1.1. Should any unexpected events disrupt the engagement to the extent that feedback may be significantly impacted, we will contact the CAA with a recovery plan, request guidance as needed, and agree a course of action.

Post-engagement action

- 10.1.1. We will collate and study the response themes, and consider how feedback may impact the airspace design.
- 10.1.2. As this is a scaled Level 2 proposal with targeted engagement instead of consultation, the engagement exercise and feedback will be summarised and presented within the Stage 4 Update and Submit documentation.
- 10.1.3. This approach has been agreed with the CAA as a proportionate way forward for this proposal.

11. Conclusion

11.1.1. This engagement strategy is proportionate, contains sufficient justification for stakeholder identification and selection, and is suitable for a scaled Level 2 ACP.

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