



DAP1916 - Statement of Need

Tracking Code: 7HL6X8D

BEFORE YOU BEGIN

- Please ensure the contents of CAP 1616f, Guidance on airspace change process for permanent airspace change proposals are referred to prior to completing this form. *

TYPE OF CHANGE

1. Category of Airspace Change

Does your proposal concern Changes to Notified Airspace Design or Planned and Permanent Redistribution of Air Traffic? *

- Changes to Notified Airspace Design Planned and Permanent Redistribution of Air Traffic

Which of the following categories is the proposal being progressed under? *

- Permanent Temporary Trial

2. Title of proposal

Please enter a title for this intended change, (max 80 characters - the title should be succinct and include a location (where appropriate)): *

Removal of Level Restriction at NEDUL on EGKK OTMET 1G STAR

- Have you previously submitted a Statement of Need?

If known, please provide the ACP/PPR reference number (###-YYYY-NNN)

ACP-2025-021

Please provide your rationale for submitting a revised Statement of Need below: *

The original SoN also included removing the level restriction at NEDUL from the Heathrow OTMET 1H STAR. However, the proposed change to the Heathrow STAR would not be PANS-OPS compliant and has thus been removed from scope. This revised SoN reflects the change in scope.

SPONSOR

3. Change Sponsor Details

Please select the appropriate category and complete. *

- A Company
 An Unincorporated Association or other body
 Individual (including sole traders and partnerships)

3a. A Company

Registered Company name (in full) *

NATS Holding Limited

Registered Company Number

03155567

Trading Address (primary site)

Trading name (if applicable)

E-mail

airspaceconsultation@nats.co.uk

Postcode

PO15 7FL

Registered Office Address

4000 Parkway, Whiteley, Hants

Country of Company Registration

United Kingdom

Country

Postcode

Email *

[REDACTED]

Confirm Email *

[REDACTED]

Do you require access to the CAA's Airspace Change Portal?

Telephone *

[REDACTED]

Primary Point of Contact Name *

[REDACTED]

Website address

Additional Contacts

You can add up to 4 additional contacts (this is useful to ensure that periods of absence are covered)

+ Add Contact

STATEMENT OF NEED

Independent Aviation/Airspace Consultancy

Is an Independent Aviation/Airspace Consultancy involved in this proposal?

Statement of Need

Please complete the following four sections. For administrative changes to the Aeronautical Information Publication, please complete relevant questions accordingly and mark the rest as "Not Applicable".

What is the objective of the proposed change? *

To enable flight plannable fuel efficiencies.

Please provide a summary of the issue or opportunity this proposal is seeking to address including any safety, operational, technical, environmental or economic factors. *

A 'level by' restriction on a STAR plate leads to airlines fuelling to this level. Removal of this will not impact on flight behaviours or descent profiles, but will enable more efficient fuel planning for airlines.

Please provide a description of the current airspace design (i.e. the airspace structure and flight procedures) relevant to this proposal. *

Current OTMET 1G STAR plate has a 'Level by 210' at NEDUL.
Procedurally there is a Standing Agreement for arrivals to be at FL210.
The initial and final level by points on the STAR will remain unchanged. Removal of the intermediate level at NEDUL will allow a higher and more efficient profile to be fuel planned for the final level by point on the STAR.

Please provide a description of the current prevailing air traffic situation (i.e. frequency and number of movements) and an indication of estimated forecast growth (where applicable). *

7,100 flights per annum flight plan via NEDUL on the OTMET 1G STAR, based on 2024 data.

As your request may include a change to and/or new instrument flight procedures, you are also required to submit a DAP1917 - Application for Approval of a PANS-OPS Designed Instrument Flight Procedure.

Are you submitting this Statement of Need to complete an Applicability and Policy Alignment Check (please refer to CAP 1616 version 5, paragraphs 2.8 to 2.11 for further details)?

Please confirm below which section of the Aeronautical Information Publication your proposed change relates to. Please use this section to specify the exact details of the nomenclature and / or qualifying remarks you are proposing to change. If your proposal contains large amounts of information (e.g. multiple latitudes/longitudes) please supply the information on a separate email. *

AD 2-EGKK-7-4

Instrument Flight Procedures

Does your proposal have the potential to include a change to and/or new IFPs?

Five-Letter Name Codes (5LNC)

Does this request solely concern the reservation of new Five-Letter Name Codes (5LNC) in advance of a future proposal?

CAP 1616h Pre-Scaled Airspace Change Proposals

Does your proposed change to airspace design fall within scope of one of the Pre-Scaled Airspace Change Proposals detailed in the appendices within CAP 1616h?

DVOR / DME / NDB Rationalisation - RNAV Substitution

Is the proposal being progressed against the requirements set out in CAP1781: VOR / DME / NDB Rationalisation: Guidance for the use of RNAV Substitution?

Secretary of State for Transport's priorities

Is the proposal being progressed under any of the priorities set by the Secretary of State for Transport or any other CAA priority such as safety or national security?

Airspace Modernisation Strategy *

Is the proposal supporting the delivery of the Airspace Modernisation Strategy? If not, please use the text box below to explain how the proposal is not inconsistent with the Airspace Modernisation Strategy

Additional Information

Please use the box below to add any further information which the CAA should be aware of when considering this submission (for example dependencies on other airspace change proposals, proposed operating date(s) and/or funding deadlines)

SUBMISSION INSTRUCTIONS

Submission

Your form has been successfully submitted. Please keep a copy of this acknowledgement for your records.

Date and Time:

06 Oct 2025 3:39:16 PM

Application Submission Number:

DAP1916V2-1655

Please note that the Airspace Regulation team will contact you to acknowledge receipt of your Statement of Need and to confirm the unique ACP reference number (ACP-YYYY-NNN) allocated to this submission. Following receipt of your unique ACP reference number, you will be required to create an associated airspace change proposal on the **CAA's Airspace Change Portal** (<https://airspacechange.caa.co.uk/>). Please refer to CAP 2385 Airspace Change Portal Important Information Guide.

Given the high number of new airspace change proposals (ACP), together with those proposals which are already in the system, it is possible that the proposal may not be assigned to a Technical Regulator/Account Manager immediately following submission of the Statement of Need. New proposals are allocated on a first come first served basis, unless the proposal is directly related to safety or national security matters, or as directed by the Secretary of State for Transport's priorities.

Once your submission has been assigned to an Account Manager/Case Officer, arrangements will be made for you to attend an Assessment Meeting. One of the key outputs from this meeting will be an indicative timeline for the proposed ACP. For Permanent changes (Level 1 and Level 2 only), to enable the CAA to consider your proposed timescales, you will be expected to present dates for the following milestones at the Assessment Meeting:

- DEFINE Gateway
- DEVELOP & ASSESS Gateway
- CONSULT Gateway
- Formal Airspace Change Proposal Submission
- DECIDE Gateway
- Target AIRAC

The CAA holds Gateway Assessment Meetings on a monthly basis and the annual schedule is published on the **CAA's airspace change portal** (<https://airspacechange.caa.co.uk/about-airspace-change/>).

Finally, you should also note that from September 2018 any amendments submitted by a Data Originator or ANSP for onward promulgation in the UK IAIP will be subject to the Aeronautical Data Quality Requirements. See Regulation (EU) No. 73/2010 as retained (and amended in UK domestic law) under the European Union (Withdrawal) Act 2018 and **CAP 1054: Aeronautical Information Management** (<https://publicapps.caa.co.uk/modalapplication.aspx?appid=11&mode=detail&id=6808>) guidance material for further information. These requirements will be discussed in greater details during the course of your initial meeting with the CAA.

When you have completed this form, click this button to submit the form for processing. Do not click this button more than once. You will then be provided with further instructions.