

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



**NATS**

Stage 4 Engagement Feedback and Response Document  
ACP-2025-023

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## Change History

Issue	Month/Year	Changes this issue (most recent first)
Issue 1.0	Oct 2025	Submitted to CAA and redacted version published to portal

## Roles

Action	Role Table	Month/Year
Produced	<b>Airspace Change Expert</b> Airspace Change Compliance & Delivery	Oct 2025
Reviewed Approved	<b>Manager Airspace Change Compliance &amp; Delivery</b> Airspace Change Compliance & Delivery	Oct 2025
Reviewed Approved	<b>Operations Implementation Manager</b> Operations Transformation	Oct 2025
Reviewed Approved	<b>Operations Development ATCO</b> Operations Transformation	Oct 2025

## Referenced Documents

Ref No	Name and description	Links
1.	CAA Airspace Change Portal for ACP-2025-023	<a href="#">Link to portal page</a>
2.	Engagement strategy	<a href="#">Direct link for PDF download</a>
3.	Engagement briefing pack	<a href="#">Direct link for PDF download</a>
4.	CAP1616 Edition 5.1: Airspace Change Process	<a href="#">Link to CAA guidance page</a>

# 1. Engagement conducted as per strategy

## 1.1 Scaled Strategy

- 1.1.1 This Engagement Feedback and Response document for ACP-2025-023 describes how the engagement was conducted in accordance with the engagement documentation published on the Airspace Change Portal<sup>(Ref 1)</sup>.
- 1.1.2 It quotes elements from the strategy document<sup>(Ref 2)</sup> but does not repeat it in full. For details, please see the complete document as published.
- 1.1.3 The complete briefing material<sup>(Ref 3)</sup> is included in Section 6 Appendix B from p.10.
- 1.1.4 Both documents were declared by the CAA to be compliant with the process at the Stage 3 gateway assessment. It was also agreed with the CAA that this ACP will be categorised as a scaled<sup>1</sup> Level 2.

## 1.2 Audience

- 1.2.1 Stakeholder identification and justification took place for the engagement strategy<sup>(Ref 2)</sup>, which was approved by the CAA.
- 1.2.2 The engagement audience was limited to two key stakeholders: MoD Defence Airspace and Air Traffic Management (DAATM) and United States Air Force in Europe (USAFE) and 17 other stakeholders:
- Relevant airports (London Luton Airport LLA and Cambridge City Airport)
  - Relevant airlines (Wizz Air, easyJet and Ryanair)
  - Relevant powered GA airfields (Duxford, Fowlmere, Little Gransden)
  - Relevant glider GA airfields (Cambridge Gliding Club at Gransden Lodge, Essex Gliding Club at Ridgewell, Rattlesden Gliding Club in Suffolk)
  - Relevant NATMAC GA organisations (GAA, BGA, BBGA, PPL/IR, LAA and British Skydiving)

## 1.3 Approach, Materials and Length

- 1.3.1 All stakeholders have an online presence and email addresses, and are native English speakers.
- 1.3.2 We sent launch emails (see Section 5 Appendix A from p.8 for examples) with a call to respond to our short survey (via online form) between 2<sup>nd</sup> and 30<sup>th</sup> September 2025.
- 1.3.3 The email included:
- A summary of the proposal within the email itself
  - A detailed briefing pack<sup>(Ref 3)</sup> which was written taking account of its intended audience, describing the single option with a qualitative assessment of its predicted impacts
  - An offer of briefings upon request
  - A link to the online survey form for response gathering.
- 1.3.4 We monitored responses and held a briefing session for LLA. Shortly after the midway point of the engagement period, we sent out reminder emails to unresponsive stakeholders. We repeated this with one week to go, as a final reminder, and the engagement period closed as planned.
- 1.3.5 Due to availability constraints of key stakeholders, we held an online briefing meeting with MoD DAATM and USAFE before the formal engagement period started, using highly mature draft material – note we had already engaged them during earlier stages. We followed up

<sup>1</sup> See the CAA Scaling Document published on the portal at <https://airspacechange.caa.co.uk/documents/download/7871>

with finalised material within the engagement period, and the key stakeholders reconfirmed their response (see Section 2 below for engagement activities).

## 2. Summary of engagement activities

2.1.1 The following activities occurred in date order, including the pre-engagement work with our key military stakeholders.

Period	Date of activity	Who	Activity summary and key points
Early pre-engagement	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 technical discussions around the concepts. Minutes and slide pack were supplied to all attendees.
Pre-engagement (see para 1.3.5)	20/08/2025	MoD DAATM with USAF RAPCON DSATCO rep and UK-USAF liaison	Further updated engagement material supplied (see also para 1.3.5). Briefing and discussion. A response was provided within the meeting with the expectation NATS would reconfirm during the formal engagement period.
Launch	02/09/2025	Formal engagement email sent to all identified stakeholders	
Engagement period	11/09/2025	LLA	Online briefing and discussion with London Luton Airport
	17/09/2025	NATS to unresponsive stakeholders	Mid-point reminder emails sent to those yet to respond to the engagement request, two weeks to go.
	23/09/2025	NATS to unresponsive stakeholders	Final reminder emails sent to those yet to respond to the engagement request, one week to go.
	25/09/2025	MoD DAATM with UK-USAF liaison	Further brief of the proposed change including sending a copy of the finalised engagement material. MoD DAATM and UK-USAF Liaison reconfirmed their response from 20/08/25. See also para 1.3.5.
Closure	30/09/2025	Survey form closes, responses are complete.	

*Table 1 Summary of all engagement activities including pre-engagement*

## 3. Feedback summary and results

### 3.1 Feedback summary

- 3.1.1 The survey invited opinion on the statement “To what extent would this airspace change benefit, or adversely impact, your aviation activities?”.
- 3.1.2 Stakeholders could choose a response option from 1 to 5, and were invited to explain how it would impact them. The table below summarises the responses:

Response options: 1 Major benefit 2 Minor benefit 3 No benefit or impact 4 Minor adverse impact 5 Major adverse impact

Ref	Organisation	Response	Summary
KEY1	DAATM on behalf of other MoD units	4	Except for USAFE, no other MoD units would be impacted
KEY2	DAATM on behalf of USAFE	4	Minimal impact on their operation
AIR2	EasyJet	2	Mitigates future traffic volumes and improves vectoring efficiency
AD1	London Luton Airport	2	Adds flexibility to LLA arrivals
AD2	Cambridge City Airport	3	No impact
NM2	British Gliding Association	4	If a glider wanted to fly at these levels it would need to enter Class C and comply with additional requirements
NM6	Aircraft Owners & Pilots Association	4	May cause a limited impact on some higher-flying GA. Minor loss of flexibility for this small proportion of GA. Most GA operates below 6,000ft therefore would not be affected
GA2	Duxford Aerodrome	4	Would reduce vertical distance between CAS and aerobatic aircraft, otherwise no significant impacts as most Duxford traffic operates lower
GL1	Essex Gliding Club	3	Does not fly this high in this area
GL3	Cambridge Gliding Club	3	Does not fly this high in this area

*Table 2 All 10 responses, summarised*

- 3.1.3 See Section 7 Appendix C on p.12 for the complete record of all responses (names and other identifying information is either omitted or redacted). Unredacted complete records will be supplied to the CAA.

### 3.2 Results

- 3.2.1 Of the 19 stakeholders invited to respond, 10 provided feedback, a response rate of 52.6%.
- 3.2.2 Of those 10, the responses were as follows:

- 1 Major benefit No responses
- 2 Minor benefit 20%, due to increased vectoring flexibility and futureproofing
- 3 No benefit or impact 30%, due to not flying high enough in the area
- 4 Minor adverse impact 50%, including the two key military stakeholders<sup>2</sup>, due to the low impact this ACP would actually cause stakeholders
- 5 Major adverse impact No responses

<sup>2</sup> For most ACPs the MoD is considered as a single stakeholder countrywide. DAATM is their agency responsible for promulgating ACP engagements to all relevant units, collating their responses and providing feedback to the ACP sponsor. For this ACP we agreed with DAATM to treat USAFE separately from other MoD units due to their proximity to the proposed change. We met directly with USAFE (with DAATM present) to effectively target discussions, and negotiate design considerations at the earliest stages of this ACP. Therefore, there are two military stakeholders, DAATM non-USAFE and DAATM USAFE.

## 4. Outcome and conclusion

### 4.1 Analysis of feedback details

4.1.1 Half of all responses stated there would be a minor benefit or no impact. The other half stated there would be a minor adverse impact.

4.1.2 Analysis of the details of each response revealed that:

- Military stakeholders were content with the design, accepting the minor level of adverse impact, and were also content that their early feedback had been considered in the development of the design as engaged upon
- The airline stakeholder would benefit
- One airport stakeholder would benefit, the other would not be impacted
- NATMAC stakeholders and the powered-GA aerodrome provided examples of how the proposed change may result in minor adverse impacts on their operations under certain circumstances
- Local gliding clubs stated they would not actually be impacted as they do not fly that high in the region

### 4.2 Design outcome following engagement

4.2.1 Considering the analysis of the responses, none of the feedback we received would cause the design to be updated, therefore we will progress the design as engaged upon.

### 4.3 Review of design principles

MDP Safety	MDP1	The airspace change proposal must maintain a high standard of safety and should seek to enhance current levels of safety.
MDP Policy	MDP2	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.
MDP Environment	MDP3	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.
DDP Technical (Ministry of Defence requirements)	DDP1	The airspace change proposal should be compatible with the requirements of the Ministry of Defence.
DDP Technical (Controlled airspace)	DDP2	The volume and classification of controlled airspace required for the provision of air traffic control services to IFR flights should be the minimum necessary to deliver an efficient airspace design, taking into account the needs of other airspace users.

4.3.1 We consider the final design is consistent with all five DPs.

### 4.4 Review of engagement objectives

4.4.1 The objectives of the engagement were:

- 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

4.4.2 As described in our engagement strategy document<sup>(Ref 2)</sup> paragraph 5.4, the engagement is deemed successful if we receive responses from our two key military stakeholders.

4.4.3 Both our key stakeholders responded, as did eight other stakeholders, therefore this was a successful engagement and we consider these objectives to be met.

### 4.5 Conclusion

4.5.1 This was an effective engagement with responses that were analysed and considered.

4.5.2 No design changes are required as a result of the feedback received, and no further engagement was required.

## 5. Appendix A: Example engagement emails

Original unredacted emails will be supplied to the CAA.

### 5.1 Launch: typical email sent to stakeholders

Controlled Airspace Change (FL100+) proposed east of Cambridge – please respond

Blue Category

NATS Internal

You replied to this message on 17/09/2025 14:46.

ACP-2025-023 OFJES Engagement Briefing Pack Issue 1.0.pdf 2 MB

Tue 02/09/2025 09:57

Dear [REDACTED]

NATS plans to introduce a small volume of Class C CAS, from FL105-FL125 between Newmarket and Bury St Edmunds, to provide additional flexibility for London Luton Airport arrivals from the east via waypoint OFJES. This will provide additional resilience and enhance the already-high standards of safety in the region.

We identified [REDACTED] as being a stakeholder, and invite you to respond to our [very short engagement survey via this link](#) by 5pm Tuesday 30<sup>th</sup> September 2025.

We have attached a short engagement briefing pack, describing the background and predicted impacts of this proposal. A summary of the proposed design is below, and full details of the history of this airspace change are available on the CAA's [Airspace Change Portal](#).

We offer an online briefing of the attached pack, please respond to this email with any such request, and we will make arrangements.

We ask for a response on behalf of your organisation, but please also pass this on to any associated local flying organisations/clubs for awareness – any individual or organisation is welcome to respond.

We thank you in advance for your response.

Kind regards,  
[REDACTED] on behalf of NATS Airspace Change Team

The current airspace and proposed change is shown below, in schematic and VFR charts.



Schematic diagram of current CAS (above), proposed CAS (below)



VFR chart edited with the proposed change (below)

As the air traffic recovery from COVID continues, the base-step between CAS volumes CLN CTA11 (FL105) and CLN CTA12 (FL125) constrains controllers in their management of descent profiles, as they integrate arrival flows from the east (via waypoint OFJES) and from the south (via waypoint OXDUF).

This impacts ATC and cockpit workload because this CAS base constraint makes it more complex to merge the two flows, requiring additional clearances and increasing the number of stepped descents.

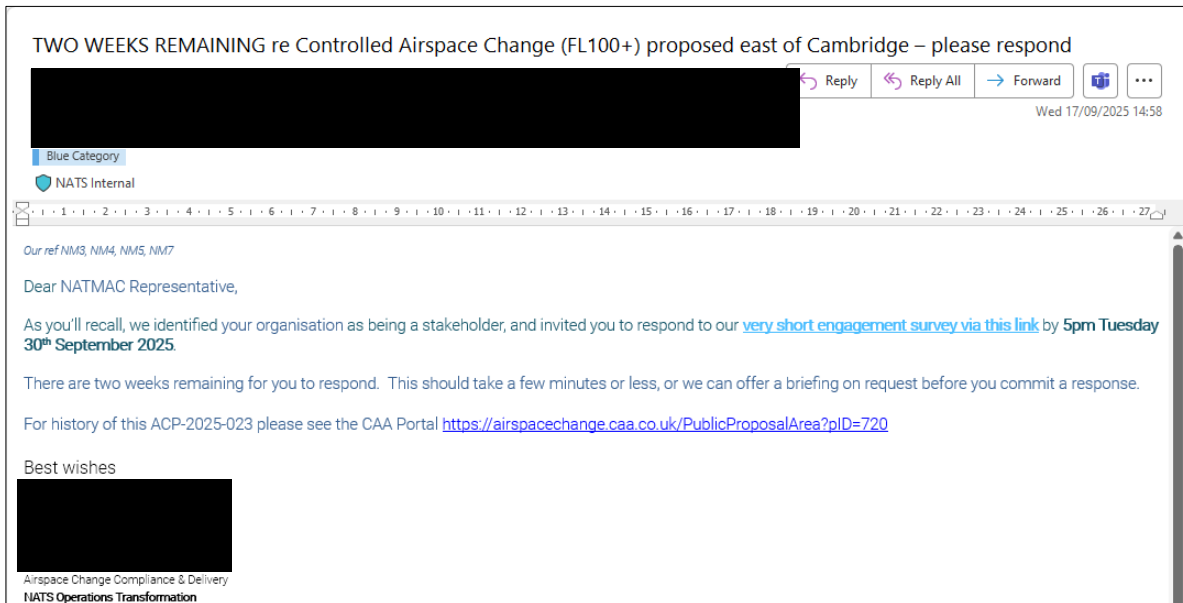
We believe the way forward is an airspace change to amend the CAS base-step boundary between CLN CTA11 and CTA12, which would provide two more flight levels for the OFJES arrival flow. This would give ATC more flexibility to safely merge the two traffic flows.

If we do not do this now, traffic will continue to increase and ATC complexity will build, with the potential for a future increase in safety risk.

[Please complete our very short engagement survey via this link](#) by 5pm Tuesday 30<sup>th</sup> September 2025.

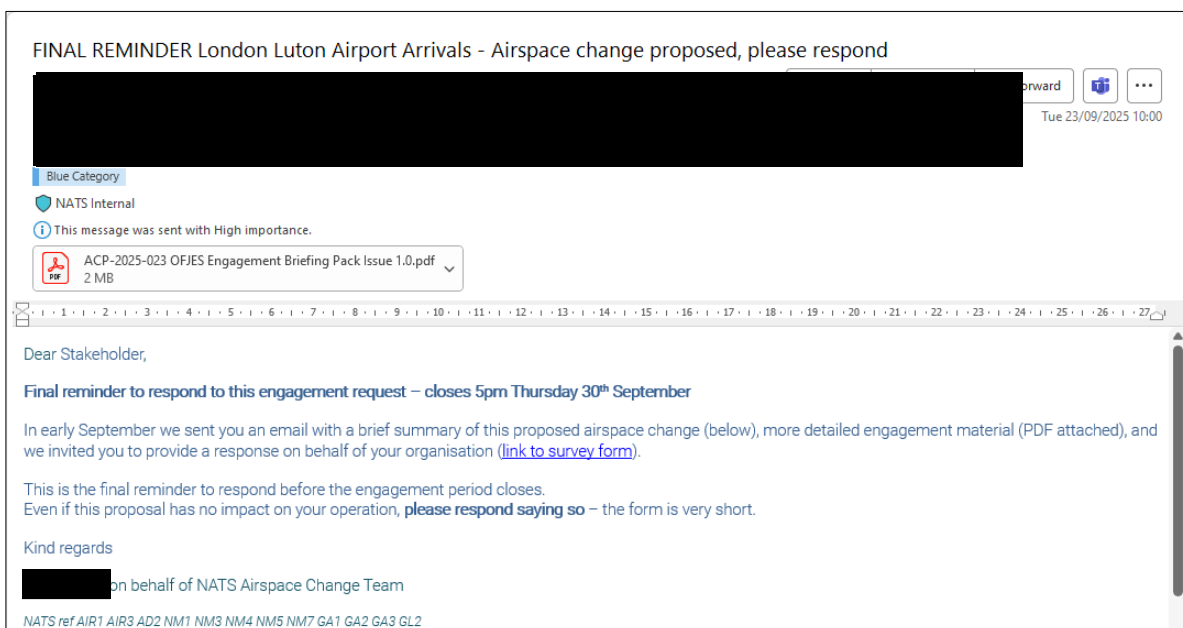


## 5.2 Mid-point: typical email sent to stakeholders



Mid-point emails also included the diagrams from the launch email, below the signature, omitted here to reduce duplication.

## 5.3 Final reminder: typical email sent to stakeholders



Final emails also included an attached copy of the engagement briefing pack, and the complete text and diagrams from the launch email, below the signature, omitted here to reduce duplication.

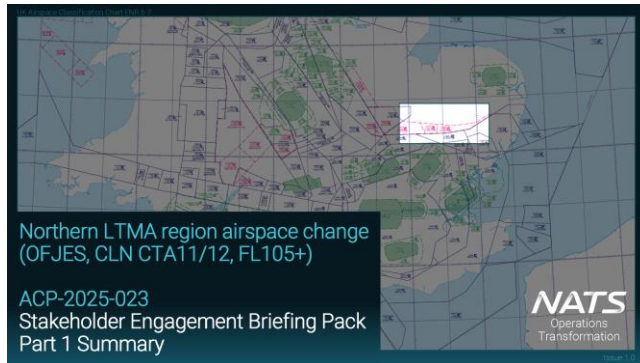
## 6. Appendix B: Engagement briefing pack

The following images are slides reduced in size and placed here from the briefing material<sup>(Ref 3)</sup> PDF pack.

The pack contained both parts in order, supplying the reader with *Part 1: Summary*, and *Part 2: Further Details*.

They are in row order, to be read left to right.

### 6.1 Part 1: Summary



#### Introduction, background, and driver for change

**NATS**

- The first 5 slides are Part 1 of this briefing pack, with a summary of the proposed change and a feedback form. This is sufficient for most readers to understand the change, and its potential impacts. More details are supplied in Part 2.
- On 24 February 2022, an airspace change known as SAIP AD6 (ACP-2018-65) delivered new airspace and STARs for London Luton Airport (LLA) and new CAS volumes at the northern edge of the LTMA. This was successful, and improved safety in the region.
- As the air traffic recovery from COVID continues, the base-step between CAS volumes CLN CTA11 (FL105) and CLN CTA12 (FL125) constrains controllers in their management of descent profiles, as they integrate arrival flows from the east (via waypoint OFJES) and from the south (via waypoint OXDUF).
- This impacts ATC and cockpit workload because this CAS base constraint makes it more complex to merge the two flows.
- We believe the way forward is an airspace change to amend the CAS base-step boundary between CLN CTA11 and CTA12, which would provide two more flight levels for the OFJES arrival flow. This would give ATC more flexibility to safely merge the two traffic flows.
- If we do not do this now, traffic will continue to increase and ATC complexity will build, with the potential for a future increase in safety risk.
- There were 2,100 LLA arrivals more in 2024 than 2023. In the first six months of 2025 there were already 600 more LLA arrivals than the same period in 2024, before the main summer holidays start, with the trend expected to continue. UK traffic is expected to increase by 5.3% from 2026 to 2035 (Source: NATS June 2025 Base Case Forecast extended to 2035).
- We are targeting implementation on Thursday 19<sup>th</sup> March 2026 (AIRAC 03/2026).
- The driver for change is to reduce ATC complexity/workload where this flow interaction occurs.
- Safety is at the heart of everything we do, so when we identify a potential future safety issue, we act.

2

#### Proposed CAS change: Option 2\* (FL105 and above)

**NATS**

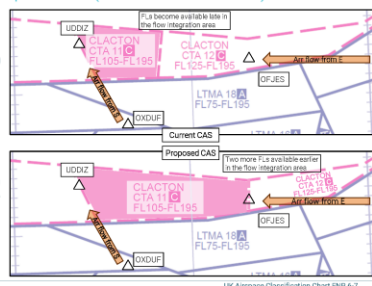
Design intent: provide more levels for ATC to integrate OFJES arrivals with OXDUF arrivals (which would not change)

Concept: extend CLN CTA11 (base FL105) east to OFJES, reduce CLN CTA12 (base FL125) by equivalent volume

Outcome: two more levels would be available to ATC, west of OFJES

Impacts: Minimised on other airspace users – least CAS required, least impact on USAF operations at RAF Lakenheath and RAF Mildenhall, least direct impact on GA, and least consequential impact on GA if USAF operations were slightly lower in the new area

Simple: minimal change to overall lateral dimensions, with which users of this region are familiar. No change to STARs.



\*Option 1 was previously rejected – see Slide 9 for summary

UK Airspace Classification Chart ENR 6-7

#### VFR chart illustrating the proposal (FL105+)

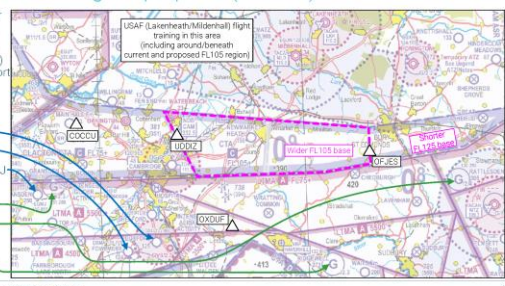
**NATS**

Relevant stakeholder sites in the region (not inc farm strips)

Powered GA: Duxford EGSU, Fowlmere EGMA

Gliding GA: Little Gransden EGMJ, Gransden Lodge

Rattlesden, Ridgewell



1:500K Southern England VFR chart Ed 51

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#### How to provide feedback – by Tues 30<sup>th</sup> Sept 2025

**NATS**



Please answer the questions in the Microsoft Form via [this link](#) or use your smartphone to read this QR code

If you are unable to use the form, please email [AirspaceConsultation@nats.co.uk](mailto:AirspaceConsultation@nats.co.uk) with your name, contact details and your responses to the following:

- Q1** To what extent would this airspace change benefit, or adversely impact, your aviation activities?  
1 major benefit, 2 minor benefit, 3 no benefit or impact, 4 minor adverse impact, 5 major adverse impact
- Q2** Please provide reasons for your answer

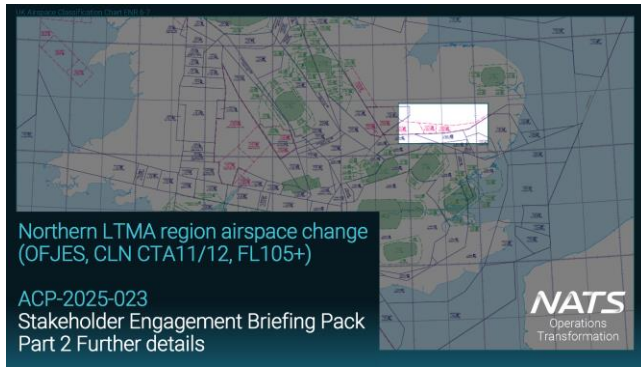
For more details of the proposal (including a rejected design option), see Part 2 of this briefing pack on the following pages

The engagement period closes at **5pm on Tuesday 30<sup>th</sup> September**

Thank you for taking the time to provide your feedback

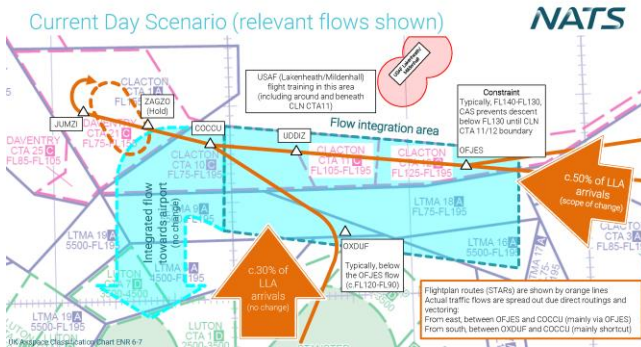
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## 6.2 Part 2: Further details



### Part 2: Further details

- This part presumes Part 1 has been read and understood. It provides further details of:
  - How we identified our stakeholders, and the justification for doing so (see below)
  - The current airspace arrangements – operational diagrams of relevant flows, and a radar trajectory density illustration
  - The rejected Option 1 (CAS extension below FL100), with reasons
  - Evidence of how the proposed FL105+ CAS region was occupied over the last year
  - An abridged options appraisal, illustrating our assessment of potential impacts on standard topics
  - Next steps and key dates
- Stakeholders: we are targeting engagement at our key stakeholders: USAF (RAF's Lakenheath and Mildenhall), and the MoD (who both have the most potential for impact due to their type and proximity of their operations). Other stakeholders include:
  - Relevant airports
    - London Luton Airport LLA (the CTAs contain 50% of their arrivals) and Cambridge City Airport (adjacent/beneath the relevant CTAs)
  - Relevant airlines and fleet mix (data based on 2024 calendar year)
    - Wizzair Group made up 58.8% of the arrival flow using Airbus A320 variants, EasyJet 17.7% of that flow also using A320 variants, and Ryanair 7.1% of that flow, using Boeing 737 variants
    - These three airlines covered 83.6% of the arrival flow where the CAS change is proposed
  - Most GA occurs below 6,000ft and would not be impacted by this proposal. GA airfields in the region where users may fly above 6,000ft are considered stakeholders (see Slide 4 in Part 1 above)
  - We will target member organisations of the National Air Traffic Management Advisory Committee (NATMAC) 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



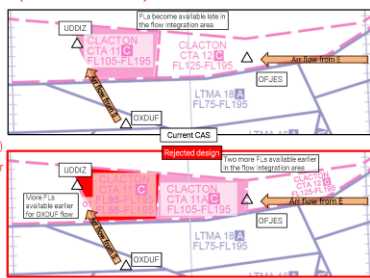
### Airspace design Option 1 (below FL100) REJECTED

Design intent: provide more levels for ATC to integrate OFJES arrivals with OXDF arrivals, which could also descend earlier

Concept: Lower the base of CLN CTA11 to FL95 or FL85, add a new CTA base FL105 west of OFJES, reduce CLN CTA12 by equivalent volume

Outcome: two more levels would be available to ATC, west of OFJES, and one or two further levels for both flows (UDDZ)

Impacts: Making CLN CTA11 base FL95 or lower would significantly adversely impact USAF operations at RAF Lakenheath and RAF Mildenhall which have multiple flight procedures beneath the current FL105 base. If USAF ops were forced to be this low across a wider area, then there would be a potentially significant increase to GA interactions.



Option 1 was rejected at Stage 2 and is provided for illustration of design progress only

### Radar occupancy evidence of traffic in the region

We identified and assessed the observed radar trajectories (ARTAS data) for the 12-month period from 01 Aug 2024 to 31 July 2025, occupying the proposed FL105-FL125 CAS extension. All flights FL100+ are required to be electronically conspicuous on radar.

We determined the type of flight, and predicted the impact this CAS extension would have. There were 58 flights in the assessment area over the year, of which 54 (93%) were arrivals traffic known to be receiving a radar-based air traffic service.

The remaining 4 (7%) were receiving a radar-based air traffic service from RAF Lakenheath. There were no other flights in the region that would be impacted.

Traffic type	Number	Impact of proposed change on those flights
Flights via air route network leaving CAS for Norwich EGS	34	Minor benefit, arrivals flights would leave CAS slightly later
Flights via air route network leaving CAS for another destination	6	Minor benefit, arrivals flights would leave CAS slightly later
Flights joining CAS to continue along the air route network	6	Minor benefit, arrivals flights would join CAS slightly sooner
Traffic known to be receiving a radar-based service from RAF Lakenheath	4	Additional coordination required, or would need to operate below FL105, or avoid the lateral extent. Could cause reduced headroom (GA beneath). USAF and MoD previously stated these impacts are acceptable
Other flights known to be receiving a radar-based air traffic service, such as routing around weather or other excursion	8	Minor benefit, e.g. arrivals flights avoiding weather would remain in CAS for longer and would re-enter CAS sooner
Traffic providing a radar return otherwise unknown to radar-based air traffic services in the area, such as high-flying GA	Nil	Would need to operate below FL105, or avoid the lateral extent (There were no radar records of this traffic type)

### Consolidated options appraisal (abridged)\*

Impact type	Option 0 (do-nothing) assessment	Option 2 (add small area of CAS FL105+)
Noise, local air quality, tranquillity, biodiversity	Not applicable (too high to change these impacts)	Not applicable (too high to change these impacts)
Fuel burn Greenhouse gas emissions	Airlines: potential for adverse impacts over time due to continued lack of ATC flexibility (increase in stepped descents and constant changing of thrust settings is more likely as traffic grows, leading to decrease in flight efficiency) Other airspace users such as GA: no change in impact	Airlines: increase in ATC flexibility would allow for reduction in stepped descents as traffic grows, offsetting a proportion of slightly earlier descents, likely to be broadly neutral overall Other airspace users such as GA: unlikely to cause a change in impact
GA access	No change in impact	Minimal impact (see Slide 11)
Airspace capacity/resilience	Resilience would continue to erode over time as traffic grows, a potential increase in risk leading to increased safety impact Likely to have negative impact on capacity	Resilience would increase, offsetting against the additional complexity caused by traffic growth Broadly neutral impact on capacity
Airline training costs, other costs, Airport/ANSP infrastructure costs, operational costs, other costs	No change in impact	No change in impact
Airport/ANSP deployment costs	No change in impact	Updates to radar maps and associated systems

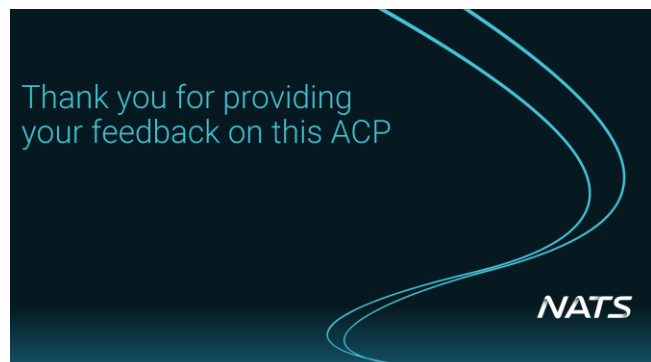
\*See separate Stage 2 document ([direct portal link](#)) for full details

### Next Steps and Key Dates

- Please provide your feedback by Tuesday 30<sup>th</sup> September – see [Slide 5](#) for how to do so
- We will study the feedback and consider it in our final design decisions
- We will write the formal ACP, collate supporting material and submit to the CAA in early October 2025
- The ACP and supporting material will also be published on the CAA airspace portal ([link](#)) in a redacted form
- The CAA will aim to decide by early December 2025
- Presuming approval, deployment activities such as engineering/system updates will occur behind the scenes, and the AIP amendment will be published by AIS on 5<sup>th</sup> February 2026
- Implementation of the change is planned for 19<sup>th</sup> March 2026, as part of AIRAC 03/2026

### Additional information

- If implemented, is the proposal reversible?
  - We have thoroughly thought through this proposal and its impacts
  - However, it is always possible that unforeseen issues or consequences could arise following the implementation of any airspace change
  - If this should occur, we would discuss with the CAA how to address those issues
  - This may be by NOTAM, by the inception of a new airspace change proposal, or there may be other solutions depending on the specific situation
  - This proposal was designed to address a potential future safety issue therefore it is highly unlikely that it would be reversed once implemented
- Does this proposal align with the UK's Airspace Modernisation Strategy CAP171?
  - This proposal, and Option 2 specifically, was designed to align with the highest priority 'ends' of the AMS, which reads: *Maintaining and, where possible, improving the UK's high levels of aviation safety has priority over all other 'ends' to be achieved by airspace modernisation*





## 7. Appendix C: Record of all responses

### 7.1 Extract from response record sheet

7.1.1 The extract below shows the original response output from the Microsoft Forms survey.

Which organisation do you represent?	Our ref	What is your position/title?	To what extent would this airspace change benefit, or adversely impact, your aviation activities?	Please provide reasons for your answer
Cambridge Gliding Club	GL3	CFI	3 No benefit or impact	FL105 is above our normal operating level in this area.
easyJet	AIR2	Flight Operations Manager Aircraft Operations	2 Minor benefit	Expected benefits based on change enabling use as mitigation for future traffic volumes plus affording more efficient vectoring. Due to tactical nature of the vectoring, modelling benefits is slightly complex.
British Gliding Association	NM2	CEO	4 Minor adverse impact	Whilst welcoming use of class C, the adverse impact is of course that should a glider need to utilise that airspace, it will need to comply with the associated airspace requirements. We would like to use this opportunity to highlight a significant legacy mismatch between UK airspace classifications and SERA. Class A denies opportunities for integration. SERA dictates that any new airspace not connected to the surface should now be Class C or less (as in proposed in this ACP). Should that policy be applied to legacy airspace, amongst the many benefits would be better integration, compliance with CAP 1711, reduced track mileage with concomitant environmental benefits and compliance/harmonisation with SERA. Such policy as part of AMS would increasingly harmonise an ICAO compliant UK FIS. Experience of UK ATC management of VFR traffic results in gold plating of Class D requirements. Compliance with a given classification's requirements - including specifically classes C and D - are what they are rather than a minimum requirement.
Essex Gliding Club	GL1	Airspace Officer / Deputy CFI	3 No benefit or impact	Gliders from our airfield (Ridgewell) generally do not reach FL100. This proposal is better for us than the original (rejected) Option 1, since that rejected option would potentially have forced the Mildenhall/Lakenheath traffic to be closer to our operations, which may in turn have increased the threat of mid-air collisions.
London Luton Airport	AD1	Flight Operations Manager	2 Minor benefit	This ACP will be of benefit to London Luton Airport (LLA) and provide flexibility to our arrivals. However, UDDIZ (Cambridge and Bury St Edmunds) is around the area that we currently receive the highest number of complaints relating to the most recent AD6 airspace change. We appreciate that noise is not seen as an impact at the levels within this ACP, but we still see complaints as an airport regardless of their altitude.
Cambridge Airport ATC	AD2	ATC Safety and Compliance Manager	3 No benefit or impact	Although the airspace is part of Cambridge ATC's area of interest the lowering of the controlled airspace will have no direct impact to the air traffic management requirements for Cambridge. However, it would be prudent for a review of co-ordination and handover procedures with NERL to ensure that any opportunities for improvements can be identified. Notwithstanding this, it is expected that there will be no adverse effect on existing interface procedures but this should be monitored and then reviewed as part of the PIR.
Duxford Airfield	GA2	Duxford Airfield Team staff	4 Minor adverse impact	No significant impacts on Duxford airfield are anticipated, most Duxford traffic operates at lower levels and the altitude change is minimal. However the gradual erosion of Class G GA Airspace is noted and acts to further restrict operations particularly by higher performance and aerobatic aircraft, (which Duxford is a major hub for), reducing the margin of separation between them and Class C airspace. It was also noted that documentation seemed to have slight bias towards the view that any increase in controlled airspace is a positive.

Table 3 Original responses from the Microsoft Forms platform (screenshot extract)

7.1.2 The original Excel file will be supplied to the CAA as the full record of MS Forms responses.

### 7.2 Email response from AOPA

7.2.1 The Aircraft Owners and Pilots Association (AOPA) responded via email, as follows:

**From:** [REDACTED]  
**Sent on:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** RE: Controlled Airspace Change (FL100+) proposed east of Cambridge – please respond

Dear [REDACTED] thank you for AOPA's response.  
On our scale of benefit vs impact I plan to categorise your response as "4 minor adverse impact" when I build the pie chart of responses, where 1 is major benefit, 3 is neither benefit nor impact, and 5 is major adverse impact.  
If this is an incorrect inference then please let me know.  
The text of all responses will be included in the published airspace change proposal document later this year, with names redacted but organisations stated.  
Kind regards,  
[REDACTED] on behalf of NATS Airspace Change Team

**From:** [REDACTED]  
**Sent:** 02 September 2025 18:54  
**To:** [REDACTED]  
**Subject:** [EXTERNAL] Re: Controlled Airspace Change (FL100+) proposed east of Cambridge – please respond

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

To NATs

The proposals in ACP-2025-023 would have only a limited impact on General Aviation (GA) flights. The change lowers the base of controlled airspace between FL105–FL125 over the OFJES area to provide controllers with two additional flight levels for integrating London Luton arrivals from the east and south. For most GA pilots, who typically operate below 6,000 ft, this change will not affect daily flying. However, pilots of higher-flying GA aircraft (including IFR-capable touring aircraft and gliders on wave days) may notice reduced access to airspace above FL105 in this area, requiring earlier coordination or a different routing to remain outside controlled airspace.

The design deliberately minimises GA impact by keeping the controlled airspace base as high as possible and avoiding Option 1 (lowering below FL100), which would have increased interactions with both GA and USAF operations. Radar analysis showed no unidentified GA flights above FL105 over the past year, suggesting very low usage. Overall, the change improves safety and efficiency for commercial traffic while creating only a minor loss of flexibility for the small proportion of GA traffic that uses upper levels, particularly IFR transits or glider flights. The class C rules allow for VFR so gliders could be accommodated and GA IFR would be subject to flight plan approvals so on balance there is no major impact on GA in this proposal.

[REDACTED]

Sent from Outlook for iOS

## 7.3 Meeting notes and relevant emails: DAATM (MoD units, USAFE units)

### 7.3.1 Pre-engagement meeting notes from online briefing 20<sup>th</sup> August 2025, before the formal engagement period began (see paragraph 1.3.5 on p.4 and activities Table 1 on p.5):

#### 2025-08-20 NERL-USAFE-MoD early engagement re OFJES CAS area 1000-1100

##### Attendance

##### USAFE

USAFE RAPCON SATCO  
USAFE RAPCON DSATCO  
US-UK Airspace Liaison

##### MoD

MoD (DAATM)

##### NERL

Operations Implementation Manager  
ATM Development ATCO  
Airspace Change Specialist  
Airspace Change Expert (apologies)

##### Agenda

1. Welcome and introductions
2. Early engagement briefing on this ACP
3. Summary, actions, and feedback
4. AOB

[Link](#) to CAA portal for this ACP.

##### Notes

NATS welcomed the attendees and thanked them for joining us today for this early engagement briefing session. Introductions were completed.

NATS presented the slide pack. This built on a previous MoD early engagement session in February and another MoD-USAFE ATC session in May 2025. The reasons for, and background of, this ACP were reviewed and discussed.

The design known as Option 2 is a result of the previous early engagement. A previous design, Option 1, was rejected specifically due to earlier feedback, and DAATM has previously written to confirm that the FL105 CAS design would be acceptable.

Option 2's predicted impacts were presented, based on radar evidence for flights in the region FL105-FL125 for the year 1<sup>st</sup> Aug 2024 – 31<sup>st</sup> July 2025.

NATS asked MoD-USAFE ATC attendees the following questions:

##### **Q1** To what extent would this airspace change benefit, or adversely impact, your aviation activities?

1 major benefit, 2 minor benefit, 3 no benefit or impact, 4 acceptable minor adverse impact, 5 unacceptable major adverse impact

##### **Q2** Please provide reasons for your answer

MoD (DAATM) indicated that USAFE ATC would be the unit most likely impacted but that response may change as feedback is sought from various MoD stakeholders during the formal engagement period.

Consistent with previous feedback, USAFE ATC stated that proposed change would have very minimal impact on their operation, and they support the change. They would class this change as **4 Acceptable minor adverse impact**.

US-UK Airspace Liaison [REDACTED] is separate to this airspace change proposal. NERL agreed to discuss this separately.

Meeting closed with NERL giving thanks to USAFE ATC and DAATM attendees for the open engagement, and NERL will advise on any update. NERL will reconfirm the feedback provided today during the formal Stage 3 engagement period.

##### Summary of actions and feedback

NATS to send notes and presentation to all, discharged upon receipt. Minutes agreed 21<sup>st</sup>. No AOB. End of document

### 7.3.2 Engagement meeting notes from online briefing 25<sup>th</sup> September 2025, during the formal engagement period (see paragraph 1.3.5 on p.4 and activities Table 1 on p.5):

**2025-09-25 NERL-USAFE-MoD meeting re USAFE topic and OFJES ACP**  
1000-1020

Invitees and Attendance

**USAFE**  
[REDACTED] USAFE RAPCON SATCO (Apologies)  
[REDACTED] USAFE RAPCON DSATCO (Apologies)  
[REDACTED] US-UK Airspace Liaison

**MoD**  
[REDACTED] DAATM  
[REDACTED] DAATM (Apologies )

**NERL**  
[REDACTED] Operations Implementation Manager  
[REDACTED] ATM Development ATCO  
[REDACTED] Airspace Change Expert

Agenda

1. Welcome and reintroductions
2. US-UK Airspace Liaison topic
3. DAATM statement re OFJES ACP MoD response
4. Summary and Actions
5. AOB

Link to CAA portal for this ACP.

Notes  
Welcome and reintroductions.

US-UK Airspace Liaison expanded on the previously-initiated topic re [REDACTED] and a technical discussion was had, with further to take place separately. This is outside the scope of the OFJES ACP and the details are not recorded in these notes.

DAATM reconfirmed their formal response to the engagement, i.e. **4 Minor adverse impact** on behalf of USAFE ATC, with no other MoD units impacted.

Meeting closed with mutual thanks.

Actions  
NATS to send notes to all, discharged upon receipt.  
End of document

### 7.3.3 Emails from DAATM and USAFE UK-US Liaison confirming their responses as captured in the meeting notes:

[EXTERNAL] RE: 1000 NATS request briefing [REDACTED]

Thu 25/09

NATS Internal

You replied to this message on 25/09/2025 10:50.

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

[REDACTED]

Content with the minutes and the capture of the minimal MOD impact.

Best regards,

[REDACTED]

[REDACTED] Defence Airspace and Air Traffic Management | Aviation  
House 11E Beehive Ringroad, Crawley, West Sussex RH10 0YR

[EXTERNAL] RE: 1000 NATS request briefing [REDACTED]

Thu 25/09

NATS Internal

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Content,


Thanks again.

Regards

[REDACTED]

Air Traffic Control Liaison Officer  
USAFE-UK/A3 - Airspace Operations  
RAF Mildenhall, UK

[REDACTED]



## 7.4 Meeting notes and relevant emails: London Luton Airport (LLA)

### 7.4.1 Engagement meeting notes from online briefing 11<sup>th</sup> September 2025:

**2025-09-11 NERL-London Luton Airport meeting re OFJES CAS area  
ACP-2025-023**

**Attendance**  
London Luton Airport (LLA)  
[REDACTED] Head of Flight Operations  
[REDACTED] Flight Operations Manager

**NERL**  
[REDACTED] Operations Implementation Manager  
[REDACTED] Operations Development ATCO  
[REDACTED] Airspace Change Expert

**Agenda**

1. [REDACTED] Welcome and introductions
2. NATS Introducing the issue
3. All Technical discussion
4. [REDACTED] Summary and Actions
5. AOB

**Notes**  
Introductions 1215hrs

NATS presented the slide pack, which had been supplied to LLA in advance, as part of the engagement launch email.

NATS and LLA discussed the CAS constraint and the design's intent to mitigate a potential future safety risk.

LLA stated that noise complaints occur in the vicinity of Cambridge (waypoint UDDIZ) and Bury St Edmunds (waypoint OFJES). Traffic in this region is no lower than FL110 (Cambridge/UDDIZ) and FL140 (Bury St Edmunds/OFJES).

NATS stated that the descent profile from the east to OFJES would remain FL140 under this proposal, and the descent profile after FL110 at UDDIZ would also remain the same. However, the proposal would likely cause more continuous descents between these two waypoints, with a corresponding reduction in stepped descents.

LLA stated that NATS can expect a response before the engagement period ends.

**AOB**  
LLA asked if there was any update on the CAA's response to the SAIP AD6 PIR. NATS stated that the most recent information we had was that the CAA anticipated publication of their response by the end of Q3 2025 (30<sup>th</sup> Sept). NATS committed to inform LLA if we received any further information.

Meeting closed 1245hrs with NATS giving thanks to LLA attendees for the open engagement.

**Actions**  
NATS to send notes (presentation already sent), discharged upon receipt.  
LLA to respond to the engagement via the survey form, discharged same day.  
End of document

### 7.4.2 Email from LLA confirming the meeting notes are accurate. LLA provided their formal response via the online survey form and are included in Table 3 on p.12.

**From:** [REDACTED]  
**Sent on:** Monday, September 22, 2025 10:47:30 AM  
**To:** [REDACTED]  
**Subject:** [EXTERNAL] RE: ACP engagement for London Luton Airport Arrivals OFJES ACP

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you are expecting this email.

Hi [REDACTED]

Thanks for the meeting notes, nothing else to add from me.

Kind regards,  
[REDACTED]

  
London Luton Airport

[REDACTED]  
Flight Operations Manager  
London Luton Airport  
Percival House, Percival Way  
Luton, LU2 9NU  
[W london-luton.co.uk](http://www.london-luton.co.uk)

## End of Stage 4 Engagement Feedback and Response Document