CAA Operational Assessment

Title of airspace change proposal	Northern LTMA Region Airspace Change (OFJES, CLN etc)
Change sponsor	NATS
Project reference	ACP-2025-023
Account Manager	[redacted]
Case study commencement date	10/10/2025
Case study report as at	05/12/2025

Instructions

In providing a response for each question, please ensure that the 'status' column is completed using the following options:

- YES
- NO
- PARTIALLY
- N/A

To aid the SARG Lead it may be useful that each question is also highlighted accordingly to illustrate what is:

resolved YES not resolved PARTIALLY not compliant NO

Executive Summary

The change sponsor is proposing moving the boundary between Clacton (CLN) CTA11 and CTA 12 (Class C airspace) to the east by approx. 9.1nm to OFJES. This will have the effect of lowering the airspace of that 9.1nm portion of airspace by 2000ft to FL105 (CTA12 base level is FL125 vs. FL105 for CTA 11). There are no proposals to amend IFP. This proposed change will provide greater tactical flexibility for controllers, making 2 additional levels available from OFJES to tactically descend traffic to facilitate flow integration of arrival traffic into London Luton (EGGW) from the east, with arrival traffic into EGGW from the south.

This ACP builds upon airspace change implemented in ACP-2018-65 (SAIP AD6). Due to the context of the change (above FL100) and the bounded scope of the change proposed (an additional two flight levels made available earlier to controllers by shifting the CTA11/12 boundary to OFJES), following the assessment meeting it was decided that this would be a scaled level 2 ACP, with scaling applied to engagement and evidence requirements. Limited options were assessed by the sponsor, which is proportionate to the nature and scale of the proposed change, and these were

down selected to a favoured option (Option 2) which delivered the desired outcomes with the least impact on other airspace users – the most important of these being USAFE. A diagram of the proposed change is included below for reference (*Airspace Change Proposal Document, figure 3, p6*):

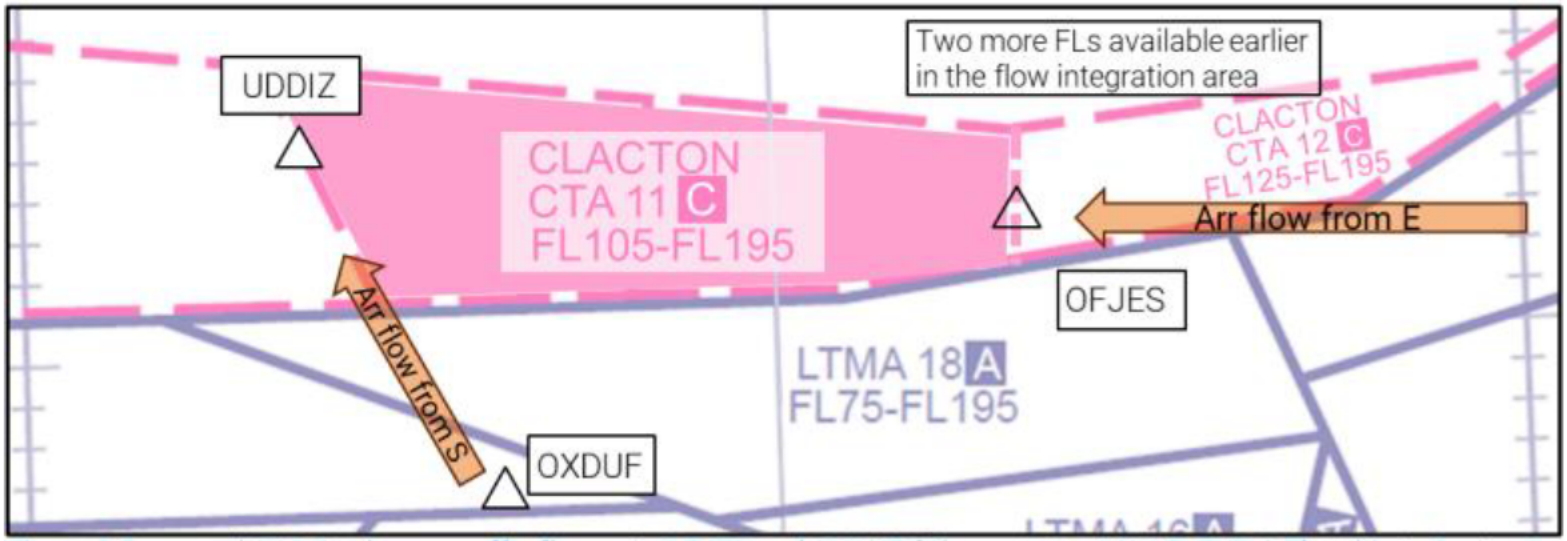

Figure 3 Proposed CAS & relevant traffic flows via OFJES and OXDUF (Chart extract UK AIP ENR-6-7) – this is Option 2

1.	Justification for change and options analysis (operational/technical)	Status
1.1	Is the explanation of the proposed change clear and understood?	YES
	The sponsor is clear that they wish to reduce ATC complexity in the flow convergence area for arrivals into EGGW from the east and the south. The sponsor summarises the constraints of the current airspace structures of CTA11/CTA12 and goes on to explain that amending the CTA11/12 boundary, pushing it further east to OFJES, would make available 2 more flight levels earlier in the flow integration area, which would assist integration, and reduce ATC workload and complexity. The ACP explains the case succinctly, using predominately qualitative evidence (as previously agreed in the assessment meeting and subsequent scaling document). The explanatory text is supported by clear diagrams which outline the current complexity, the current airspace design and the proposed change.	
1.2	Are the reasons for the change stated and acceptable?	YES

	The sponsor is clear in the SoN that they wish to reduce Air Traffic Control (ATC) complexity and workload in an area to the north of the London Terminal Manoeuvring Area (TMA) where traffic flows into Luton (EGGW) from the east and south are integrated. The sponsor explains the current airspace and operation and highlights the main issue resides with the airspace boundary between CLN CTA11 and CLN CTA12, which results in flight levels becoming available late in the flow integration area for arrivals from the east. The sponsor states that the reason for the change is to mitigate a future potential safety risk, which is anticipated to arise when forecast traffic levels increase, and this rationale for change has been verified, and is supported by, the ATS inspector, who notes that the challenge posed by the current airspace design (i.e. to get aircraft descending as early as possible to facilitate integration) is particularly noticeable when there is a strong tailwind from the east. In the assessment meeting the sponsor clarified that all tactical measures to mitigate the risk have been implemented. This was evidenced with supporting documentation, which was provided following a Stage 5 clarification request. The remaining outstanding mitigation available is to implement an airspace change. The ACP itself is light on detail of the ATC challenges that the current airspace design poses (an example being division of attention due to need to 'catch' aircraft arriving from the east and descend them as soon as they enter a portion of airspace with a lower base level to avoid aircraft being 'stuck' above southerly arrivals); however, supporting documentation provided relevant analysis. In addition, rather than mitigating a 'potential…future increase in risk' as stated in the ACP (*3.3.3 Airspace Change Proposal Document, p8*), the proposed timeline of the change points to a need to mitigate in the near term i.e. before the next summer season. Irrespective, the case is made for the need to act to address a "potential future safety issue" *(3.3.4, Airspace Change Proposal Document, p8*).	
1.3	Have all appropriate alternative options been considered, including the 'do nothing' option?	YES
	The sponsor considered three options in the ACP. Option 0 was the baseline 'do nothing' option, which was rejected as it did not address the potential safety issue. Option 2, which was progressed, proposed the movement of the boundary of CLN CTA 11 and CLN CTA 12 east to OFJES which had the effect of extending the FL105 base of Controlled Air Space (CAS). Option 1 (which was rejected) proposed a lower base of CAS than Option 2. For Option 1, the boundary of CTA11 and CTA12 moved to OFJES (as per Option 2); however, CTA11 was split into two, with the base of CTA11A lowered to FL105 and the base of CTA11 lowered to FL85/FL95. This was rejected due to stakeholder feedback about the impact on other airspace users if CAS extended below FL100. Given the bounded nature of the issue which the ACP attempts to resolve (reducing complexity and workload in the area of flow integration), the sponsor's consideration of three options (which provided modest adjustments to the existing airspace structure), is assessed to be proportionate and justified.	
1.4	Is the justification for the selection of the proposed option sound and acceptable?	YES
	The sponsor explains that Option 1 was rejected at an early stage in the ACP as early feedback indicated that lowering CAS below FL100 would have caused an unacceptable and disproportionate impact on the main user of the airspace proposed for change – USAFE. As the baseline 'do nothing' it was anticipated that Option 0 would be rejected. Option 0 was indeed rejected because it would not resolve the ATC workload/complexity over time and would therefore not maintain a high level of safety when traffic demand increased. Option 2 is	

	therefore assessed by the sponsor to best maintain a high level of safety and balance the needs of all airspace users by proposing the least amount of additional Class C airspace to deliver the intended outcomes. One consideration which is not stated in the documentation is the resilience/longevity of the proposed option. The sponsor states that the proposal is required to address a potential future issue. However, there is no indication as to when this issue might manifest (i.e. is there a traffic level threshold above which a different solution might be required?) and the expected 'resilience' of the proposed solution (i.e. the preferred option can work optimally up to a certain level of traffic). However, noting the timelines for UKADS, one could reasonably expect a comprehensive airspace redesign in the area that this proposal covers in the medium term, meaning the preferred option will only be a short term build on the existing SAIP AD6 design. However, it would have potentially been useful for the sponsor to set out this context in the proposal. Ongoing Human Factors (HF) monitoring will be required to provide assurance that the design continues to deliver the desired effect.

2.	Airspace description and operational arrangements	Status
2.1	Is the type of proposed airspace design clearly stated and understood?	YES
	The change proposes an adjustment to Class C airspace – moving the boundary of CTA 11 and CTA 12 further to the east to, in effect, extend the base of CAS (FL105) further to the east. This provides two additional levels to allow the tactical descent of arrivals from the east at OFJES which assists with flow integration with aircraft from the south, allowing earlier descent than at present. The ACP is clear that this is not a proposed amendment to IFPs – which will remain as published. This ACP simply amends the dimensions of two portions of Class C airspace in order to provide controllers with greater tactical flexibility to descend aircraft earlier, where required.	
2.2	Are the hours of operation of the airspace and any seasonal variations stated and acceptable?	N/A
	CLN CTA 11 and 12 are currently operated H24 and this ACP will not amend the hours of operation. There are no seasonal variations. The sponsor makes no specific reference to hours of operation as a result.	
2.3	Is any interaction with adjacent domestic and international airspace structures stated and acceptable including an explanation of how connectivity is to be achieved? Has the agreement of adjacent States been secured in respect of High Seas airspace changes?	YES
	There is no change to the interaction with adjacent airspace structures and the sponsor states that there will be "no change" to connectivity (*Airspace Change Proposal Document, Table 2, final row*). The sponsor states that "there would be no change to any instrument flight procedures, navigation waypoints or routes under this ACP, purely a change to the two controlled airspace volumes…CLN CTA11 and CTA 12." (*Stage 4 Airspace Change Proposal Document para 2.6.2, p6).*	

	Clacton CTA 10, 11 and 12 remain coherently connected with the step down of the base level of CAS remaining at FL125 (CTA 12), FL105 (CTA11) and FL75 (CTA10), with the extent of the FL105 base level extended to the east by approx. 9.1nm. There is no interaction with international airspace structures.	
2.4	Is the supporting statistical evidence relevant and acceptable?	YES
	The ACP contains limited statistical evidence as it was agreed in the assessment meeting, and subsequent scaling document, that the assessment could be primarily qualitative. The key aviation statistical data which has been provided is the analysis of the usage of the Class G airspace relevant to the ACP. This data demonstrated that usage was limited, with very few GA tracks displayed and very modest usage by USAFE aircraft. This data assisted the sponsor with their engagement, as they were able to demonstrate the limited usage to potentially impacted user groups. The sponsor provided details of traffic levels for previous years to demonstrate the trend of traffic growth. At a previous Gateway, the sponsor was asked to provide forecast year 10 traffic levels for EGGW. The sponsor provided a 10-year forecast for UK traffic levels and stated that the effort required to provide newly calculated forecast traffic levels specifically for EGGW would be disproportionate given the change context. Noting the proposed change is addressing a near term issue of complexity, and the fact that UKADS will implement future changes to the LTMA in the medium term, it was assessed that statistics providing a 10 year forecast would not add value to the CAA's decision-making process. As noted in 1.4, ongoing HF monitoring will be the most effective method of assessing the ongoing effectiveness of the proposed design, in the context of increased traffic levels over time.	
2.5	Is the analysis of the impact of the traffic mix on complexity and workload of operations complete and satisfactory?	N/A
	The sponsor states that the traffic mix will not change under this ACP (*Stage 4 Airspace Change Proposal Document, Table 2, p 12*). Irrespective of the traffic mix remaining unchanged, the ACP has been proposed in order to reduce ATC complexity and workload in the flow convergence area and the ACP explains how the proposed design will achieve this by providing greater tactical freedom for controllers to descend aircraft earlier from the east, thus aiding flow convergence and reducing controller and aircrew workload. No simulations are proposed, which is proportionate considering the scope of the proposed change to CAS. The sponsor states that "an ATC Procedures Safety Assessment (APSA) will be carried out in due course and prior to implementation" (*Stage 4 Airspace Change Proposal Document, 8.1.1, p13*). As stated in 1.4, the resilience/longevity of the proposed option is not assessed by the sponsor. It would have potentially been useful for	

	the sponsor to set out this context in the proposal, notwithstanding the expected implementation of a UKADS LTMA solution in the medium term . Ongoing Human Factors (HF) monitoring will be required to provide assurance that the design continues to deliver the desired effect in the short to medium term.	
2.6	Are any draft Letters of Agreement and/or Memoranda of Understanding included and, if so, do they contain the commitments to resolve ATS procedures (ATSD) and airspace management requirements?	N/A
	The sponsor has identified in para 2.11.2 of the Stage 4 Airspace Change Proposal Document that no changes are required to any Letters of Agreement as a result of this proposal.	
2.7	Should there be any other aviation activity (low flying, gliding, parachuting, microlight site etc) in the vicinity of the new airspace structure and no suitable operating agreements or ATC Procedures can be devised, what action has the change sponsor carried out to resolve any conflicting interests?	YES
	Stage 3 stakeholder engagement indicated there were no outstanding conflicting interests to resolve. MoD, USAFE, the BGA, AOPA and Duxford Aerodrome indicated in their feedback that the airspace change would have a "minor adverse impact," (*Stage 4 Engagement Feedback and Response Document table 2, p6*). Discounting Option 1 at an earlier stage of the ACP, addressed a previous conflicting interest with USAFE and DAATM's feedback on behalf of USAFE stated that there would be a 'minimal impact on their [USAFE] operation" (*Stage 4 Engagement Feedback and Response Document, Table 2, Ref KEY2*). There are therefore no outstanding conflicting interests to resolve.	
2.8	Is the evidence that the airspace design is compliant with ICAO SARPs, airspace design & FUA regulations, and Eurocontrol guidance satisfactory?	YES
	An expansion of Class C airspace is proposed with the preferred option, with the boundary between CTA11/CTA 12 moving east by approx. 9.1nm and the base lowering to FL105 from FL125. As such, the amount of CAS, and the airspace classification (Class C) is assessed to be the minimum required to maintain a high standard of air safety and is therefore assessed to be in accord with the AMS. The ACP itself states that it aligns with the UK AMS (*Airspace Change Proposal Document, 2.9, p7*). No IFP changes are proposed. The sponsor provides a statement that the proposal "will comply with all CAA airspace design policies and regulations" (*Airspace Change Proposal Document, 7.1.1., p13*) and the documentation and evidence supports this being the case.	
2.9	Is the proposed airspace classification stated and justification for that classification acceptable?	YES
	The Final Options Appraisal (9.1.1.1 General Aviation: Access) states that the airspace classification for option 2 will remain Class C for both CTA 11 and CTA 12, in line with SERA and the surrounding airspace structures (i.e.: airspace not connected to the surface should be Class C or lower airspace classification). In terms of the reduction of Class G airspace, the base of CAS at FL105 would be extended by approx. 9.1nm to OFJES reducing the base of FL125 CAS by the same. This is assessed to be the minimum CAS required to achieve the desired outcome.	

	It is noted that in the Stage 4 Engagement Feedback and Response Document, both the BGA (section 7.1.1, p12) and the Aircraft Owners and Pilots Association (AOPA – section 7.2.1, p12) both comment favourably on the rules for Class C allowing for VFR gliders to be accommodated, albeit having to abide by the rules of that airspace classification.	
2.10	Within the constraints of safety and efficiency, does the airspace classification permit access to as many classes of user as practicable?	YES
	Class C is the optimal airspace classification as it affords the necessary protection to IFR arrivals into EGGW. However, as noted by AOPA and the BGA in their feedback to this ACP, Class C rules allow for VFR traffic. Indeed, the BGA and AOPA responses welcome the use of class C (Stage 4 Engagement Feedback and Response Document, 7.1.1 (BGA) and 7.2.1 (AOPA). The final options appraisal states that "in practice GA flights rarely fly this high [FL105], and neither do they request entry to the within-scope CTAs" (*Airspace Change Proposal Document, Final Options Appraisal: Access*). Based on the data available, the CAA agrees that it is unlikely that GA would require transit of this airspace; however, in accordance with the classification, a VFR transit request could be made. A query was sent to the sponsor to clarify how VFR traffic would be managed, should a VFR transit be requested, given the comments made by the BGA and AOPA vs. the final sentence in the *Access* section of the Final Options Appraisal which states, "This very small number of flights would need to either avoid the CAS extension laterally, or fly slightly lower" (*Airspace Change Proposal Document, Final Options Appraisal: Access).* The sponsor provided clarification that, *"*in accordance with the classification, should any pilot request transit of the airspace, the controller would consider the request in context of the current traffic situation, the nature of the request itself, and the performance of the type of aircraft involved" (para 2.1.8, *Stage 5 CAA-requested clarifications ACP-2025-023*).	
2.11	Is there assurance, as far as practicable, against unauthorised incursions? (This is usually done through the classification and promulgation.)	YES
	The Stage 4 Draft Summary of AIP Changes outlines the proposed changes to the new CLN CTA 11 and CTA 12 (Class C) which will be promulgated in the AIP, if the ACP is approved. It also details the changes required to the ENR 6-7 and ENR 6-42 charts. There was a broad consensus from the GA community in their feedback that the majority of GA traffic would be below 6000ft AMSL which reduces the risk of unauthorised incursion due to very low traffic volumes of other airspace users in the area impacted by the proposed change. This was supported and evidenced by the sponsor's analysis of airspace usage over a 12 month period. There was one comment from Duxford that the proposal would "restrict operations, particularly for higher performance and aerobatic aircraft…reducing the margin of separation between them and Class C airspace" (*Engagement Feedback and Response Document, Table 3, p12*) and a clarification question was sent to the sponsor to ask how they analysed this feedback. The sponsor provided robust evidence that, with almost all aerobatic manoeuvres taking place below 6000ft AGL, the margin of separation would be more than sufficient and would maintain existing levels of safety (Section 3.2, *Stage 5 CAA-requested clarifications ACP-2025-023*).	

2.12	Is there a commitment to allow access to all airspace users seeking a transit through controlled airspace as per the classification, or in the event of such a request being denied, a service around the affected area?	YES
	CLN CTA 11 and CTA 12 have a standard entry in the ENR2.2, "*To operate UAS within this area, UAS operators are required to notify NATS via the NATS Non-Standard Flight (NSF) Portal. UAS operators are required to notify NATS at least 14 days before the date of each activity*." An additional frequency (121.230) is provided. ENR2.2 CLN CTA 12 column 5 states that the frequency is used for: "GAT inbound/outbound to/from and/or overflying the LTMA and Clacton CTA 12." If the ACP is approved, this additional frequency would be removed from CLN CTA 12 and would become available within CLN CTA 11 (not available in current AIP). This 'switch' reflects the minor sector boundary change resulting from the ACP. No stated commitment is made in the ACP document to allow access to all airspace users seeking a transit. The likelihood of GA traffic requesting access is very low due to analysis of current airspace usage and stakeholder feedback. Indeed, the final options appraisal states that "in practice GA flights rarely fly this high [FL105], and neither do they request entry to the within-scope CTAs" (*Airspace Change Proposal Document, Final Options Appraisal: Access*). A clarification query was sent to the sponsor regarding how VFR traffic could be managed, noting the BGA and AOPA feedback regarding Class C and VFR flights vs. the final sentence in the *Access* section of the Final Options Appraisal which states, "This very small number of flights would need to either avoid the CAS extension laterally, or fly slightly lower" (*Airspace Change Proposal Document, Final Options Appraisal: Access).* The sponsor confirmed that, *"*in accordance with the classification, should any pilot request transit of the airspace, the controller would consider the request in context of the current traffic situation, the nature of the request itself, and the performance of the type of aircraft involved. A clearance to transit may be issued by the controller, provided the pilot can accept the terms of that clearance. If no such clearance can be given under the evolving traffic scenario, the controller would have no choice but to instruct the aircraft to remain outside CAS until such time as a clearance may be viable, or it may be that the traffic scenario is expected to preclude a clearance for a significant period of time. This is standard for radar controllers operating in Class C." (para 2.1.8 and 2.19, *Stage 5 CAA-requested clarifications ACP-2025-023*).	
2.13	Are appropriate arrangements for transiting aircraft in place in accordance with stated commitments?	YES
	There are no proposed changes to how aircraft transit the airspace within scope of the change (i.e. CTA11/CTA12). Of note the minor sector boundary amendment is reflected in the AIP amendments, with the additional frequency (provided for "GAT inbound/outbound to/from and/or overflying the LTMA and Clacton CTA 12" ENR2.2 CLACTION CTA column 5) moving from CTA12 to CTA11 in the proposed AIP amendment (Summary of AIP Changes Document, 2.1.1. and 2.1.2).	

	The sponsor states that, "in practice GA flights rarely fly this high [FL105], and neither do they request entry to the within-scope CTAs" (*Airspace Change Proposal Document, Final Options Appraisal: Access*). The sponsor provided a comprehensive response to the CAA's clarification query about airspace access in Section 2: Airspace Access of their document *Stage 5 CAA-requested clarifications ACP-2025-023*.	
2.14	Are any airspace user group's requirements not met?	YES
	Stage 3 stakeholder engagement was reviewed. MoD, USAFE, the BGA, AOPA and Duxford Aerodrome's feedback was that the airspace change would have a "minor adverse impact," (Stage 4 Engagement Feedback and Response Document table 2, p6). Discounting Option 1 at an earlier stage of the ACP, mitigated the concerns of the key stakeholder – USAFE and ensured that their requirements were met. Cambridge Airport and both Essex and Cambridge gliding clubs stated that the ACP would have no benefit or impact (due to the users not flying high enough in this area). Notwithstanding the fact that no stakeholders fed back that their requirements would not be met, a clarification query was sent to the sponsor to understand how they have closed the loop/followed up on some feedback made by Cambridge and Duxford airport. The sponsor provided clarification on these clarification queries in "Section 3: Stakeholder Feedback Follow on Actions" of their document *Stage 5 CAA-requested clarifications ACP-2025-023*.	
2.15	Is any delegation of ATS justified and acceptable? (If yes, refer to Delegated ATS Procedure).	N/A
	This ACP requires no delegation of ATS.	
2.16	Is the airspace design of sufficient dimensions with regard to expected aircraft navigation performance and manoeuvrability to contain horizontal and vertical flight activity (including holding patterns) and associated protected areas in both radar and non-radar environments?	YES
	No IFP amendments are proposed. The additional two flight levels provided by the lowering of the base of CTA 11 from FL125 to FL105 and the shift of the boundary between CTA 12 and CTA11 to the east by 9.1nm simply provides additional tactical flexibility for air traffic controllers to descend arrival traffic from the east earlier, to aid flow integration with traffic arriving from the south.	
2.17	Have all safety buffer requirements (or mitigation of these) been identified and described satisfactorily (to be in accordance with the agreed parameters or show acceptable mitigation)? (Refer to buffer policy letter.)	N/A
	There is no proposed Special Use Airspace or requirement for a buffer.	
2.18	Do ATC procedures ensure the maintenance of prescribed separation between traffic inside a new airspace structure and traffic within existing adjacent or other new airspace structures?	PARTIALLY

	The sponsor has stated there will be "no change" to ATC procedures (*Airspace Change Proposal Document, Table 2, p 12*). This would be the anticipated outcome, given the context and modest scope of the change, the airspace classification (class C) and the fact that no IFP changes are proposed. The sponsor states an APSA will be carried out prior to implementation which will identify potential consequential impacts for ATC. The drafting of ATC instructions for inclusion in Swanwick Manual of ATC Part 2 will cover any details and be managed through the unit's SMS with submissions to the CAA. Any inclusion will be submitted to the respective ATS inspectors via the SRG1430 form. This notification will be reviewed and approved where necessary. Any ATC instructions must be submitted at least 30 working days prior to implementation of the change so are not visible at this time to be reviewed.	
2.19	Is the airspace structure designed to ensure that adequate and appropriate terrain clearance can be readily applied within and adjacent to the proposed airspace?	N/A
	Not applicable. The proposed airspace change is at FL105. No IFP changes are proposed.	
2.20	If the new structure lies close to another airspace structure or overlaps an associated airspace structure, have appropriate operating arrangements been agreed?	YES
	The new airspace is managed by NERL, therefore operating arrangements will be maintained and managed by the sponsor. The sponsor states that "London Terminal Control has identified this change would raise no issues within the terminal environment, and would not impact the en-route environment." (*Airspace Change Proposal Document, 8.1.2, p13*).	
2.21	Where terminal and en-route structures adjoin, is the effective integration of departure and arrival routes achieved?	YES
	There is no change to the way in which arrivals from the east leave the enroute structures and the ACP proposes no IFP changes to any STARs. As above, the sponsor states that "London Terminal Control has identified this change would raise no issues within the terminal environment, and would not impact the en-route environment." (*Airspace Change Proposal Document, 8.1.2, p13*).	

3.	Supporting resources and communications, navigation and surveillance(CNS) infrastructure	Status
3.1	Is the evidence of supporting CNS infrastructure together with availability and contingency procedures complete and acceptable? The following are to be satisfied:	

	• **Communication:** Is the evidence of communications infrastructure including RT coverage together with availability and contingency procedures complete and acceptable? Has this frequency been agreed with AAA Infrastructure?	YES
	The sponsor states that "the CAS boundary change is in a region well covered by communications, navigation and surveillance (CNS) infrastructure and is demonstrably sufficient" (Airspace Change Proposal document, 6.1.1, p13). This is supported by evidence provided for SAIP AD6 (ACP-2018-65) which show a high level of CNS resilience down to 5,00ft AMSL in the area encompassed by this ACP. No new frequencies are proposed.	
	• **Navigation:** Is there sufficient accurate navigational guidance based on in-line VOR or NDB or by approved RNAV-derived sources, to contain the aircraft within the route to the published RNP value in accordance with ICAO/ Eurocontrol standards? For example, for navaids, has coverage assessment been made, such as a DEMETER report, and if so, is it satisfactory?	N/A
	There are no proposed amendments to IFP, which remain as published.	
	• **Surveillance:** Radar provision – have radar diagrams been provided, and do they show that the ATS route/airspace structure can be supported?	N/A
	Radar diagrams have not been provided and are not necessary, due to the limited nature of the change (limited to a lowering of the base level of CAS from FL125 to FL105), and the base level of CAS of adjacent airspace structures i.e. LTMA 18 immediately to the south of CLN CTA 11 and CTA 12 has a base level of FL75 and CLN CTA 10 immediately to the west, has a base level of FL75. As above, evidence provided for SAIP AD6 (ACP-2018-65) demonstrates provision and a high level of CNS resilience down to 5,00ft AMSL in the area encompassed by this ACP.	
3.2	Where appropriate, are there any indications of the resources to be applied, or a commitment to provide them, in line with current forecast traffic growth acceptable?	N/A
	The sponsor provides a brief outline about deployment costs in the final options appraisal (*Airspace Change Proposal Document, Table 4, p 14).* The nature of the proposed change means that no additional operating resources are required because of this proposal. The deployment resources are modest: principally updating radar maps and associated systems and briefing controllers.	

4.	Maps/charts/diagrams	Status
4.1	Is a diagram of the proposed airspace included in the proposal, clearly showing the dimensions and WGS84 co-ordinates? (We would expect sponsors to include clear maps and diagrams of the proposed airspace structure(s) – they do not have to accord with aeronautical cartographical standards (see airspace change guidance), rather they should be clear and unambiguous and reflect precisely the narrative descriptions of the proposals.)	YES
	Diagrams of the proposed change to CTA11 and CTA 12 are clearly detailed in Fig 7 (p11) of the Airspace Change Proposal Document. Draft CAS charts (ENR 6-7 and ENR 6-42) are included at 2.2.1 and 2.2.2 respectively of the Draft Summary of AIP Changes Document (p3) as well as associated WGS84 co-ordinates at 2.1.1 and 2.2.2 of the same document. Clear draft charts were also provided during the engagement (*example at 5.1 - sample email (p8) Engagement Feedback and Response Document and in Appendix B: Engagement Briefing Pack, p10*), which also provides helpful labels to clearly highlight the arrival flows, and 5LNCSs (NB: 5LNCs are not being amended) to aid understanding and situational awareness for the aviation stakeholders the engagement targeted.	
4.2	Do the charts clearly indicate the proposed airspace change?	YES
	Proposed changes to CTA11 and CTA 12 are clearly detailed in Fig 7 (p11) of the Airspace Change Proposal Document. Draft CAS charts (ENR 6-7 and ENR 6-42) are included at 2.2.1 and 2.2.2 respectively of the Draft Summary of AIP Changes Document (p3). Clear draft charts were also provided during the engagement (*example at 5.1 - sample email (p8) Engagement Feedback and Response Document and in Appendix B: Engagement Briefing Pack, p10*), which also provides helpful labels to clearly highlight the arrival flows, and 5LNCSs (NB: 5LNCs are not being amended) to aid understanding and situational awareness for the aviation stakeholders the engagement targeted.	
4.3	Has the change sponsor identified AIP pages affected by the change proposal and provided a draft amendment?	YES
	Stage 4 Summary of AIP Changes Document provides a draft amendment to the AIP for the relevant data/text in ENR2.2.	
4.4	Has the change sponsor completed the WGS84 spreadsheet and submitted to the CAA for approval?	YES
	Two AeroData spreadsheets have been provided by the sponsor. The sponsor explains that the first AeroData workbook amends the lateral airspace vertices; the second is out with the ACP and is corrective technical work which is needed because adjacent airspace volumes have legacy vertices which were originally calculated using a different methodology. These two workbooks have been checked and approved by the data team and are ready for submission to AIS on receipt of the Airspace Change Approval.	

5.	Operational impact	Status
5.1	Is the change sponsor's analysis of the impact of the change on all airspace users, airfields and traffic levels, and evidence of mitigation of the effects of the change on any of these, complete and satisfactory? Consideration should be given to:	
	a) Impact on IFR General Aviation traffic, on Operational air traffic or on VFR General Aviation traffic flow in or through the area.	YES
	The sponsor has identified key stakeholders (USAFE and MoD) early in the CAP1616 process and have engaged with them throughout, incorporating their input into the proposed options. Section 5 for the Airspace Change Proposal document (p12) provides a checklist of the anticipated operational impacts. For the most part this cross refers to paras 2.8-2.9 on p.7 and the Engagement Feedback document. The sponsor's analysis points to there being benefits for Operational Air Traffic and ATC, as a result of the reduced complexity and greater tactical flexibility. The responses from those stakeholders representing General Aviation traffic indicated either 'no impact' or minor adverse impact. This aligns with the sponsor's traffic analysis of the airspace in scope for change. As per 2.10, 2.12 and 2.13 above, a clarification question has been posed as to how VFR traffic would be managed in this airspace, given the comments made by the BGA and AOPA regarding Class C allowing VFR. Noting that it would be a rare occurrence for GA traffic to request access to this proposed airspace, the sponsor nevertheless confirmed that, "in accordance with the classification, should any pilot request transit of the airspace, the controller would consider the request in context of the current traffic situation, the nature of the request itself, and the performance of the type of aircraft involved. A clearance to transit may be issued by the controller, provided the pilot can accept the terms of that clearance. If no such clearance can be given under the evolving traffic scenario, the controller would have no choice but to instruct the aircraft to remain outside CAS until such time as a clearance may be viable, or it may be that the traffic scenario is expected to preclude a clearance for a significant period of time. This is standard for radar controllers operating in Class C." (para 2.1.8 and 2.19, *Stage 5 CAA-requested clarifications ACP-2025-023*). The CAA is satisfied that there will be minimal impacts due to the levels of the proposed airspace and the minimal usage of the current Class G airspace that is proposed to become Class C under this proposal.	
	b) Impact on VFR Routes.	N/A

	There is no impact on VFR routes.	
	c) Consequential effects on procedures and capacity, i.e. on SIDs, STARs, holds. Details of existing or planned routes and holds.	N/A
	No IFP changes are proposed in this ACP.	
	d) Impact on airfields and other specific activities within or adjacent to the proposed airspace.	YES
	The sponsor has considered local airfields and airspace users in their submission and during the process. As mentioned in 2.11 above, although not consequential to the airspace design, there was one comment from Duxford Airfield that the proposal would "restrict operations, particularly for higher performance and aerobatic aircraft…reducing the margin of separation between them and Class C airspace" (*Engagement Feedback and Response Document, Table 3, p12*) and a clarification question was sent to the sponsor to ask how they analysed and followed up this feedback. The sponsor provided clarification in "Section 3: Stakeholder Feedback Follow on Actions" of their document *Stage 5 CAA-requested clarifications ACP-2025-023*, providing expert input from the British Aerobatic Association that aerobatics would rarely take place above 5000-6000ft AGL which allowed the loop to be closed on the Duxford feedback.	
	e) Any flight planning restrictions and/ or route requirements.	N/A
	No IFP changes are proposed in this ACP and the sponsor states there would be 'no change' (*Airspace Change Proposal Document, Table 2, p 12)*	
5.2	Does the change sponsor consultation material reflect the likely operational impact of the change?	YES
	The consultation material provides a concise and clear summary of the proposal to for the aviation stakeholders to which it was targeted and the associated briefing pack specifically outlined the impacts (*slide3, p10, Part 2: Further details, Engagement Feedback and Response Document).* The most useful part of the consultation material is the slide which demonstrates the results of the airspace analysis conducted, which breaks down the traffic into traffic types for the period 1 Aug 2024 to 31 Jul 2025 (*slide 11, p11, Part 2: Further details, Engagement Feedback and Response Document*). This allows the potentially impacted stakeholders to better understand the potential impact based on	

	current usage statistics and, reviewing the responses, this helped them to assess the potential impact on their operation, as only 58 flights were recorded during this period in the area proposed for the CAS extension. Of these, 54 were airways traffic know to be receiving a radar based air traffic service. The remaining 4 were receiving a service from USAFE. By including the discounted option in the consultation material (*slide 10, p11, Part 2: Further details, Engagement Feedback and Response Document*), the sponsor's have demonstrated the efforts made to minimise operation impacts on other airspace users and to ensure that the design uses the minimum Class C airspace to achieve the objective of the airspace proposal.

Case study conclusions – to be completed by Airspace Regulator (Technical)	**Yes/No**
Has the change sponsor met the SARG airspace change proposal requirements and airspace regulatory requirements above?	YES
Yes. The sponsor has met the requirements of CAP1616, appropriate to the scaled Level 2 Airspace Change Proposal, which this ACP was categorised as.	

RECOMMENDATIONS/CONDITIONS/PIR DATA REQUIREMENTS	**Yes/No**
Are there any Recommendations which the change sponsor **should try** to address either before or after implementation (if approved)? If yes, please list them below.	NO
Are there any Condition(s) which the change sponsor **must fulfil** either before or after implementation (if approved)? If yes, please list them below.	YES
GUIDANCE NOTE: *Conditions are something that the change sponsor **must fulfil** either before or after implementation, if indeed the airspace change proposal is approved. If their proposal is approved, change sponsors **must observe** any condition(s) contained within the regulatory decision; failure to do so **will usually** result in the approval being revoked. Conditions should specify the consequence of failing to meet that condition, whether that be revoking the ACP or some alternative.* 1) The briefing of the requisite staff must be completed prior to implementation. 2) An APSA must be completed prior to implementation. 3) ATC Instructions, which include the proposed ATC mitigation procedures, charts, etc must be submitted at least 30 working days	

prior to implementation of the change.

Are there any specific requirements in terms of the data to be collected by the change sponsor for the Post Implementation Review (if approved)? If yes, please list them below.	YES

1) Human Performance monitoring on controller performance post implementation will be required at Stage 7 (Post Implementation Review).

General summary

This Airspace Change Proposal (ACP) was submitted in order to address a specific ATC complexity in the flow convergence area for arrivals into Luton (EGGW) from the east and the south in the vicinity of OFJES. The sponsor summarises the constraints of the current airspace structures and highlights the main issue resides with the airspace boundary between CLN CTA11 and CLN CTA12, which results in flight levels becoming available late in the flow integration area for arrivals from the east. The sponsor explains how amending the CTA11/12 boundary, pushing it further east to OFJES, would make two more flight levels available earlier in the flow integration area, which would aid integration, and reduce ATC workload and complexity.

The change sponsor's preferred option proposes to move the boundary between Clacton (CLN) CTA11 and CTA 12 (Class C airspace) to the east by approx. 9.1nm to OFJES. This will have the effect of lowering the airspace of that 9.1nm portion of airspace by 2000ft to FL105 (CTA12 base level is FL125 vs. FL105 for CTA 11). There are no proposals to amend IFP, only the volume of these two blocks of airspace. This proposed change will simply and effectively provide greater tactical flexibility for controllers, making 2 additional levels available from OFJES to descend traffic to facilitate flow integration.

The ACP explains the case succinctly and clearly, using predominately qualitative evidence (previously agreed by the CAA as appropriate and proportionate for this scaled Level 2 ACP). The ACP documentation is supported by clear diagrams which outline the current complexity, the current airspace design and the proposed change.

This ACP builds upon airspace change implemented in ACP-2018-65 (SAIP AD6). Limited options were assessed by the sponsor, which is proportionate to the nature and scale of the proposed change, and these were down selected to a favoured option which delivered the desired outcomes with the least

impact on other airspace users. The sponsor explains that Option 1 was rejected at an early stage in the ACP as early feedback indicated that lowering CAS below FL100 would have caused an unacceptable and disproportionate impact on the main user of the airspace proposed for change – USAFE. Option 0 (baseline) was, as expected, rejected because it would not resolve the ATC workload/complexity over time and would therefore not maintain a high level of safety when traffic demand increased. Option 2 is therefore assessed by the sponsor to best maintain a high level of safety and balance the needs of all airspace users by proposing the least amount of additional Class C airspace to deliver the intended outcomes.

Overall, the operational impact to other airspace users is assessed to be minimal. Airspace analysis data provided for the airspace in scope for the proposed change demonstrated that usage was limited, with very few GA tracks displayed and very modest usage by USAFE aircraft. This was backed up by CAA analysis. This data helped to situate and inform stakeholder responses. Stakeholder feedback indicated there were no outstanding conflicting interests to resolve, with MoD, USAFE, the BGA, AOPA and Duxford Aerodrome providing feedback that the airspace change would have a "minor adverse impact." No significant concerns were raised by stakeholders and there was no requirement to amend the design post Stage 3 engagement. This demonstrated the benefit of early engagement with USAFE and MoD, whose feedback informed the development and amendment of designs at an early stage in the ACP.

The sponsor was able to demonstrate that all other tactical measures to mitigate the future safety risk have been implemented. The remaining outstanding mitigation is to implement an airspace change. The CAA, based on the evidence provided, agrees with the sponsor that the change proposed addresses the future risk described, by reducing complexity and ATC workload through the amendment of Class C airspace to make available additional flight levels earlier in the flow integration area. Likewise, the CAA agrees with the sponsor that the proposed design achieves the objective while minimising the impact on other airspace users. The sponsor does not make an assessment of the medium term resilience and longevity of the proposed design. Notwithstanding the expected implementation of a UKADS LTMA design in the medium term, ongoing HF monitoring is included as a data requirement for the PIR, as this is assessed to be the best methodology for assessing the continued effectiveness of the design.

As per standard at this stage of the ACP process, the only outstanding elements at this point are the completion of the APSA and ATC instructions and other associated implementation processes. These will be implemented via the sponsor's standard SMS procedures and have been captured in the conditions.

The changes proposed are recommended for approval.

Operational assessment sign-off	Name	Signature	Date
Operational assessment completed by Airspace Regulator (Technical)	[redacted]	[redacted]	19/11/2025
Manager AR comment / Decision	**Name**	**Signature**	**Date**
Operational assessment conclusions approved by Manager AR	[redacted]	[redacted]	5/12/2025
Manager AR Comments and Decision: Comments contained in decision log			