

## CAA Engagement Assessment – permanent change

### CAP 1616 – Edition 5

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	06/11/2025

#### 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

NATS proposes introducing a small volume of Class C controlled airspace (CAS) between FL105 and FL125, located between Newmarket and Bury St Edmunds, to provide additional flexibility for London Luton Airport (EGGW) arrivals from the east via waypoint OFJES.

Currently, the alignment of Luton arrival flows in this region creates congestion and ATC complexity. To address this, NATS plans to move the boundary between Clacton (CLN) CTA11 and CTA12 eastward by approximately 9.1 NM to OFJES and lower the base level from FL125 to FL105. This adjustment will give controllers two additional flight levels for descending traffic, improving flow integration for Luton arrivals from the east and south.

This ACP was classified as a scaled Level 2 ACP during the assessment meeting. The sponsor applied scaling to their engagement, opting for targeted engagement rather than formal consultation, which was approved by the CAA at stage 3.

MoD and USAFE were identified early as the most likely impacted users, and their feedback shaped the design, leading to the rejection of the first option

that would have caused greater operational impacts.

A 4-week engagement period was conducted via email, inviting 19 stakeholders, with 10 responses received. Feedback included minor adverse impacts (primarily from GA and military stakeholders), mitigated by earlier design changes, alongside comments indicating minor benefits, neutral positions, and low-level concerns. No significant objections were raised.

Overall, the engagement was proportionate, ensuring that stakeholder input was considered and documented. The sponsor confirmed that none of the feedback lead to design changes, and no further engagement was necessary.

#### PART A – Summary of Airspace Change Process to date

A.1		
A.2	Stage 1 DEFINE Gateway/Output	N/A
A.2.1		
A.3	Stage 2 DEVELOP and ASSESS Gateway/Output	N/A
A.3.1		
A.4	Stage 3 ENGAGE Gateway	28/08/25
A.4.1	The change sponsor produced an engagement strategy and engagement material which was submitted to the CAA for review at the stage 3 gateway. CAA completed the review and was satisfied that the change sponsor had met the requirements of the process up to that point.	
A.5	Stage 4 UPDATE and SUBMIT	10/10/25
A.5.1	The sponsor formally submitted their proposal and the required documentation.	

#### PART B – Engagement Assessment

B.1	AUDIENCE	
B.1.1	Did the change sponsor's engagement target the right audience?	YES
	As part of scaling this ACP, Sponsor opted for targeted engagement rather than a formal consultation stating that it was due to limited stakeholder impact, low expected impact and the fact that no non-aviation stakeholders could be impacted. Engagement was therefore	

limited to 2 key stakeholders and 17 other aviation stakeholders. According to the sponsor, this approach ensured proportionality and relevance, aligning with the expected low impact of the change.

**Key Stakeholders** (Military stakeholders where the potential impact is greatest) included:

- Ministry of Defence (MoD) via Defence Airspace and Air Traffic Management (DAATM): DAATM acts as the central point for military aviation matters and coordinates feedback across all branches of the military.
- United States Air Force in Europe (USAFE) via Lakenheath RAPCON: RAPCON provides air traffic services for RAF Lakenheath and RAF Mildenhall. USAF regularly operates at high flight levels in the vicinity of the proposed change and is therefore a key stakeholder.

**Other Stakeholders** (stakeholders that may have an interest but are less likely to be significantly impacted) included:

Relevant Airports

- London Luton Airport (LLA) as arrivals use the airspace within scope.
- Cambridge City Airport as located adjacent to and beneath the proposed change.

Relevant Airlines- Based on 2024 flight planning data for LLA arrivals via OFJES:

- Wizzair Group: 58.8%, EasyJet: 17.7% and Ryanair: 7.1%

Together, these 3 airlines account for 83.6% of relevant traffic and were invited to respond. Other operators (each <2.6%) were not formally invited but were welcome to provide feedback.

Relevant GA Airfields- Sponsor identified powered and glider GA airfields within a 45nm x 30nm area around the proposed change:

- Powered GA: Duxford (EGSU), Fowlmere (EGMA), Little Gransden (EGMJ)
- Glider GA: Cambridge Gliding Club, Essex Gliding Club, Rattlesden Gliding Club

Excluded: farm strips, heliports, military airfields (covered via DAATM), and Cambridge City Airport (already addressed).

Relevant NATMAC Member Organisations - Only those representing GA users who may operate above 6,000ft were invited:

- General Aviation Alliance (GAA)
- British Gliding Association (BGA)
- British Business and General Aviation (BBGA)
- PPL/IR Europe
- Light Aircraft Association (LAA)

	<ul style="list-style-type: none"> <li>• British Skydiving</li> </ul> <p>Sponsor stated that other NATMAC organisations were not relevant to the scope or region of the proposal and were not formally invited. However, NERL welcomed feedback from any individual or organisation that believed they may be impacted.</p>
	<p>Please provide a summary of responses the sponsor received below</p> <p>A total of 19 stakeholders were invited to respond to the survey question: "<i>To what extent would this airspace change benefit or adversely impact your aviation activities?</i>" 10 responses were received, resulting in a 52.6% response rate. Stakeholders were asked to rate the impact on a scale from 1 (major benefit) to 5 (major adverse impact), and to provide supporting comments.</p> <p>2 stakeholders - EasyJet and LLA, indicated a minor benefit, citing improved vectoring and increased flexibility for arrivals as positive outcomes. 3 stakeholders - Cambridge City Airport, Essex Gliding Club, and Cambridge Gliding Club, reported no benefit or impact, as their operations do not extend to the altitudes affected by the proposed change.</p> <p>5 stakeholders identified a minor adverse impact. The MoD, represented by DAATM, noted minimal impact, with only USAFE potentially affected. USAFE itself confirmed a minor operational impact. The BGA raised concerns about additional requirements for gliders entering Class C airspace. The AOPA mentioned a limited loss of flexibility for higher-flying general aviation, although most GA operates below the affected level. Duxford Aerodrome highlighted reduced vertical separation for aerobatic aircraft but noted that most of its traffic operates at lower altitudes.</p> <p>No stakeholders selected "major benefit" or "major adverse impact." So, no responses were received in those categories.</p> <p>Feedback from MoD, USAFE, BGA, AOPA, and Duxford Aerodrome are summarised in the Stage 4 Engagement Feedback document consistently indicated a minor adverse impact. Earlier in the process, the removal of Option 1 helped mitigate some concerns, particularly for USAFE, ensuring their operational requirements were met. Overall, the responses reflect a mix of minor benefits, neutral positions, and low-level concerns, with no significant objections raised.</p>
B.1.2	<p><b>APPROACH</b></p> <p>Did the change sponsor engage stakeholders in a suitable way? If the change sponsor produced an engagement strategy, was the conduct of the engagement aligned with that strategy?</p> <p>The change sponsor engaged stakeholders appropriately and the engagement was aligned with the engagement strategy. The sponsor produced an engagement strategy which was shared with the CAA at stage 3. Email was the primary communication channel, with stakeholders receiving a summary of the proposal in the email body, an attached briefing pack containing a link to an online survey, and an offer to attend online group briefings upon request. According to the sponsor, the engagement targeted a limited number of English-speaking aviation stakeholders, all of whom had an online presence and had previously been involved in other ACPs. To extend the reach of the engagement, the sponsor asked groups such as NATMAC and GA to use intermediaries, to respond on behalf of their organisations and to raise awareness of the proposed changes among their members.</p>
B.2.1	<p>YES</p>

	What steps did the change sponsor take to encourage stakeholders to participate in the engagement?	YES
B.2.2	<p>The change sponsor took the below steps to encourage stakeholder participation.</p> <ol style="list-style-type: none"> <li>Carried out early pre-engagement as follows: <ul style="list-style-type: none"> <li>13/02/25: Initial engagement with MoD DAATM then a follow-up with MoD DAATM on 07/03/25.</li> <li>08/05/25: Meeting with MoD DAATM, USAFE RAPCON representative, and UK USAFE liaison.</li> <li>20/08/25: Pre-engagement meeting with MoD DAATM and USAFE (minutes enclosed in Appendix C).</li> </ul> </li> <li>Formal Engagement Launch: <ul style="list-style-type: none"> <li>02/09/25: Launch email sent to all stakeholders (evidence in Section 5 Appendix A) stating engagement period from 2 September to 30 September 2025 (4 weeks).</li> </ul> </li> <li>Reminders to Encourage Participation: <ul style="list-style-type: none"> <li>17/09/25: Midpoint reminder email sent to unresponsive stakeholders.</li> <li>23/09/25: Final reminder email sent a week before the deadline.</li> </ul> </li> <li>Flexible Response Options: <ul style="list-style-type: none"> <li>Stakeholders could respond via the online form and responses to the email itself was accepted in lieu of completing the online form.</li> <li>No paper/postal responses were accepted; stakeholders were directed to use the electronic materials.</li> </ul> </li> <li>Briefings as follows: <ul style="list-style-type: none"> <li>Offer of online briefings upon request, ideally held in the first half of the engagement period.</li> <li>11/09/25: Online briefing held with LLA (meeting minutes in Appendix C).</li> <li>Pre-launch briefing held with MoD DAATM and USAFE using near-final materials due to availability constraints.</li> <li>25/09/25: Follow-up with MoD DAATM and USAFE liaison to share finalised materials and reconfirm their response.</li> </ul> <p>Due to availability constraints of key stakeholders, an online briefing meeting was held with MoD DAATM and USAFE before formal engagement start, using mature draft material- engagement had already been done with them in earlier stages. A follow up was sent with finalised material within the engagement period and key stakeholders reconfirmed their response.</p> </li> <li>Use of Intermediaries: <ul style="list-style-type: none"> <li>NATMAC groups were asked to respond on behalf of their organisation and raise awareness among their members and GA airfields were asked to submit a response as an organisation and inform pilots operating from their airfields</li> </ul> </li> </ol>	

about the ACP.		
B.2.3	Was the change sponsor required to respond to any unexpected events and/or challenges?  However, a contingency was in place as per the submission document stating that should any unforeseen events disrupted the engagement to the extent that stakeholder feedback was significantly impacted, the sponsor would have contacted the CAA, provide a recovery plan, request guidance, and agree on a suitable course of action.	NO
<b>B.3 MATERIALS</b>		
B.3.1	What materials were used by the change sponsor to engage with stakeholders?  The engagement email: <ul style="list-style-type: none"><li>Included a summary of the proposal in the email body.</li><li>Attached a detailed briefing pack describing the single proposed option.</li><li>Contained a link to an online Microsoft forms survey for submitting responses.</li></ul> Briefing Pack (referenced in Section 6, Appendix B): <ul style="list-style-type: none"><li>Provided comprehensive details about the ACP.</li><li>Designed to support stakeholders in understanding the proposal and its potential impacts.</li></ul> Survey Platform: <ul style="list-style-type: none"><li>Microsoft Forms was used to collect feedback.</li><li>Stakeholders could also respond directly via email if preferred.</li></ul>	
B.3.2	Did the materials provide stakeholders with enough information to ensure that they understood the issue(s) and potential impact(s) on them?  The engagement materials provided stakeholders with a comprehensive and appropriately detailed overview to support informed responses. <ul style="list-style-type: none"><li>The briefing pack clearly outlined the scope and rationale for the ACP, supported by up-to-date and credible data sources, including the latest VFR charts and relevant datasets.</li><li>Operational diagrams and draft CAS charts (e.g., CTA 11 and CTA 12) were included to visually illustrate the proposed changes. These were supplemented with sample radar trajectory data to enhance situational awareness.</li><li>The materials included an analysis of airspace occupancy using SSR data, showing current usage patterns above FL100, and provided forecasted UK traffic growth to contextualise the proposal.</li><li>A summary of the rejected option from Stage 2 and an abridged version of the Stage 2 Consolidated Options Appraisal were included to explain the decision-making process.</li></ul>	YES

<ul style="list-style-type: none"> <li>The language used was standard written English, appropriate for the targeted audience of aviation professionals familiar with technical terminology and airspace concepts.</li> <li>While the survey used a 1–5 scale to assess impact, with terms such as “minor” or “major”, there is no indication that this caused limited stakeholder participation. A range of stakeholders responded using the scale without raising concerns about its clarity or appropriateness.</li> </ul> <p>Overall, the materials were well-structured, technically sound, and tailored to the needs and knowledge level of the intended audience.</p>		
<b>B.4</b>	<b>LENGTH</b>	
<b>B.4.1</b>	<p>Please confirm the start/end dates and the duration of the engagement below</p> <p>Started: 10:00 AM on Tuesday, 2nd September 2025 Ended: 5:00 PM on Tuesday, 30th September 2025</p> <p>A four-week (28-day) engagement period.</p>	
<b>B.4.2</b>	<p>What was the justification for the duration of the engagement period?</p> <p>The sponsor considered the engagement period to be appropriate given the nature of the exercise. This was a targeted engagement aimed at a limited group of professional aviation stakeholders, all of whom were known to have an online presence and prior experience with similar ACPs.</p>	<b>YES</b>
<b>B.4.3</b>	<p>Was the period of engagement proportionate, giving stakeholders adequate time for consideration and response?</p> <p>The period of engagement was proportionate and gave stakeholders adequate time to consider and respond. For a scaled Level 2 ACP, the 4-week formal engagement period was appropriate as early pre-engagement with key stakeholders, including MoD DAATM and USAFE, began as early as February 2025. These early discussions ensured that the most affected stakeholders had advance notice and the opportunity to shape their responses ahead of the formal engagement.</p>	<b>YES</b>
<b>B.5</b>	<b>FEEDBACK</b>	
<b>B.5.1</b>	<p>Has the change sponsor correctly identified all the issues raised during engagement and accurately captured them in the engagement summary document?</p> <p>The change sponsor has provided a spreadsheet containing all stakeholder responses and has clearly stated in the submission that 10 responses were received. This engagement summary spreadsheet shows that stakeholders were asked to rate the extent to which the ACP would benefit or impact stakeholder activities on a scale from 1 (major benefit) to 5 (major adverse impact) and provides supporting comments and reasons for their answers.</p> <p>Additional raw evidence that was provided includes:</p>	<b>YES</b>

- The launch email initiating engagement sent to aviation stakeholders
- A selection of stakeholder responses and meeting minutes from discussions with the MoD, USAFE, and LLA
- Reminder emails prompting responses

Based on this evidence, all issues raised during engagement has been captured and reflected in the final submission documents.

B.5.2	<p>Does the engagement summary document detail the change sponsor's response to the identified issues? Is the change sponsor's response to the issues raised appropriate/adequate?</p> <p>Although the engagement summary document does not explicitly detail the change sponsor's response to each identified issue, the change sponsor has explained whether each element of feedback carried forward from the engagement response document did, or did not, influence the final design option through the evidence provided.</p> <p>As the raw evidence and original engagement summary did not clearly show how stakeholder concerns were addressed, a clarification question was sent to the sponsor. In response, the sponsor issued a subsequent document titled CAA-requested clarifications, which provided detailed responses and confirmed follow-up actions where necessary.</p>	YES
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#### Key Issues and How They Were Addressed by Sponsor

1. MoD and USAFE highlighted that the ACP would lead to a minor adverse impact; USAFE suggested minimal operational impact.  
*Sponsor response:* Military stakeholders were content with the design, accepting the minor level of adverse impact and confirmed that their early feedback had been considered in the design engaged upon. Meeting notes and emails show USAFE ATC agreed impact is minimal and supported the change. No design changes were required.
2. LLA noted that the change would lead to a minor benefit and adds flexibility for arrivals. However, they raised a concern about complaints near UDDIZ despite low noise impact.  
*Sponsor Response:* Operational benefit acknowledged; noise concern noted in meeting minutes with sponsor stating that the descent profile from the east to OFJES would remain FL140 and the descent profile after FL110 at UDDIZ would also remain the same. No design changes were required.
3. Cambridge City Airport responded by stating that the ACP would have no impact to their activities however, suggested review of coordination and handover procedures with NERL.

*Sponsor Response:* Sponsor confirmed LoA procedures reviewed biennially (last update September 2025, next review March 2026). Improvements can be implemented at any time. No design changes were required.

4. BGA noted that the ACP would lead to a minor adverse impact and highlighted legacy mismatch with SERA and CAS.

*Sponsor Response:* Sponsor provided detailed explanation stating that CAS base kept high, radar analysis showed minimal GA use, Class C rules allow VFR access. No design changes were required.

5. Aircraft Owners & Pilots Association (AOPA) highlighted that the ACP would lead to a minor adverse impact specifically noting the limited flexibility for higher GA flights.

*Sponsor Response:* Sponsor provided detailed justification in the clarifications document, including mitigation rationale. No design changes required.

For both BGA & AOPA, sponsor confirmed Class C procedures allow VFR transit requests; controllers would consider glider performance and traffic context. Sponsor further stated that 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. Radar analysis showed no glider activity at proposed levels over 12 months, making such requests extremely unlikely.

6. Duxford Aerodrome stated that the change would result in a minor adverse impact specifically, reduced vertical distance for aerobatic aircraft and noted bias toward CAS expansion.

*Sponsor Response:* Sponsor took follow-up action, engaged British Aerobatic Association, which confirmed aerobatic flights rarely exceed 6,000 ft, validating minimal impact. Email record included in evidence.

The sponsor's responses were appropriate and adequate (See ops assessment re; technicalities) with the clarifications document reinforcing assurance that all feedback was considered proportionately. None of the feedback influenced the final design, so no design changes were required, and no further engagement was deemed necessary. In total, 10 responses were received, including two key stakeholders (MoD and USAFE) and eight additional stakeholders.

B.6 GENERAL		
B.6.1	Has the change sponsor ensured that the final airspace change proposal does not include any design elements that have not been engaged on, unless they were approved by the CAA in advance?	YES
The change sponsor has ensured that the final ACP does not include any design elements that were not previously engaged on.		
B.6.2	Is the final airspace change proposal aligned with the conclusions of the engagement summary document?	YES
The sponsor identified the right audiences and provided a rationale for selecting them. Sponsor also explained the approach used for engagement using emails and other forums that were deemed necessary. An acceptable rationale for pursuing the engagement period was provided. For audit trail purposes, sponsor also provided raw evidence in terms of email correspondence which show that stakeholders did not object to the change.		
B.6.3	If there is a substantial difference between the airspace change proposal engaged on and the final design option, has the change sponsor re-engaged? If not, has the change sponsor provided a rationale why additional engagement was not required?	N/A
	N/A	
B.7 RECOMMENDATIONS/CONDITIONS/PIR DATA REQUIREMENTS		
B.7.1	Are there any recommendations which the change sponsor <u>should try</u> to address either before or after implementation (if approved)? If yes, please list them below.  None	NO
B.7.2	Are there any condition(s) which the change sponsor <u>must fulfil</u> either before or after implementation (if approved)? If yes, please list them below.  None	NO
B.7.3	If a Post Implementation Review is required, are there any additional engagement requirements in terms of the data to be collected by the change sponsor for the Post Implementation Review? If yes, please list them below.	YES

Change sponsor must collate data from feedback/complaints received from stakeholders in the period between implementation and post-implementation review and present it to the CAA.

### PART C – Engagement Assessment Conclusion(s)

C.1	Does the engagement meet the CAA's regulatory requirements for this airspace change, the Government's guidance principles for consultation and the Secretary of State's Air Navigation Guidance?	YES
	<p>I am satisfied that the change sponsor has conducted this engagement in accordance with the requirements of CAP 1616, that they have demonstrated the Government's consultation principles and that the engagement undertaken was aligned to the Gunning Principles. The evidence for this is summarised below:</p> <ul style="list-style-type: none"> <li>• The engagement took place when the proposal was at a formative stage. This is evidenced by early stakeholder contact beginning on the 2<sup>nd</sup> of September 2025, prior to finalising the design, allowing time for meaningful input.</li> <li>• Sufficient information was available to enable stakeholders to give 'intelligent consideration' to the proposals. This is evidenced by the provision of a detailed explanatory email and the briefing material outlining the proposed changes and their context.</li> <li>• The engagement provided an adequate time to allow for consideration and response. This is evidenced by an engagement period running from the 2<sup>nd</sup> of September 25 for 4 weeks, with initial engagement and briefing sessions held with key stakeholders to encourage participation.</li> <li>• The change sponsor has demonstrated how they have conscientiously taken into account the feedback. This is evidenced by the engagement summary and supplementary documentation, which record all responses received and explain how the feedback was addressed.</li> </ul>	

**Level 2 ACP**

<b>PART D – Engagement Assessment sign-off</b>			
	<b>Name</b>	<b>Signature</b>	<b>Date</b>
Engagement assessment completed by Airspace Regulator (Engagement and Consultation)	[REDACTED]	[REDACTED]	19/11/25
Engagement assessment conclusions approved by Principal Airspace Regulator (Engagement and Consultation)	[REDACTED]	[REDACTED]	20/11/25