CAA Environmental Statement
Permanent Airspace Change Proposals

Title of airspace change proposal	Northern LTMA Region Airspace Change (OFJES, CLN etc)
Change sponsor	NATS
Project reference	ACP-2025-023
Account Manager	[redacted]

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

1. Introduction

Post the Swanwick Airspace Improvement Programme - Airspace Deployment 6 (SAIP AD6) airspace change (ACP-2018-065), the change sponsor identified airspace congestion and Air Traffic Control (ATC) complexity to the north of the London Terminal Manoeuvring Area (TMA) associated with the convergence of Luton Airport arrivals from the east and south. The change sponsor identified that the issue has the potential to affect aviation safety if left unresolved and as traffic levels increase.

This airspace change proposal (ACP) seeks to move the boundary between Clacton Control Areas CTA11 and CTA12 (Class C airspace) approximately 9.1nm to the east to waypoint OFJES. This would have the effect of lowering the base level of CTA12 from Flight Level 12,500ft. (FL125) to Flight Level 10,500ft. (FL105), aligning with CTA11 and providing two additional levels and greater tactical flexibility for Air Traffic Controllers (ATCOs) to integrate the two flows. The change sponsor states that, *"a reduction in congestion and complexity would lead to ATC workload reduction and further improve safety in the region"*.

The current proposal is for an airspace change above FL100 and has been assessed as a Level 2 ACP with proportionate scaling applied as per the nature of the proposed change. In accordance with the Department for Transport's (DfT) altitude-based priorities, the environmental priority is to reduce

aircraft CO_2 emissions in support of the objective to ensure that the aviation sector makes a significant and cost-effective contribution towards reducing global emissions. Therefore, only an assessment of CO_2 emissions is required and there is no explicit requirement for the change sponsor to assess other environmental aspects, including impacts on noise, local air quality, tranquillity, and biodiversity.

2. Statement of Need		**Yes/No**
2.1	Does the statement of need include any environmental objectives, issues or opportunities to be addressed? *(CAP 1616f paragraph 2.11)*	No
	The Statement of Need (SoN) does not include any environmental objectives, issues or opportunities to be addressed.	

3. Current-Day Scenario		**Yes/No**
3.1	Has the change sponsor described the current-day scenario? *(CAP 1616f paragraph 2.36)*	Yes
	The change sponsor's Stage 4 submission (OFJES Issue 1.0) provided diagrams illustrating the current airspace arrangement together with quantitative data to describe airspace usage, airlines and fleet mix. The change sponsor identified the relevant Standard Terminal Arrival Routes (STARS) and the two airspace structures (CTA11 and CTA12) within the scope of the proposed airspace change. At Stage 3 of the ACP, the change sponsor provided observed radar trajectories for the 12-month period (August 2024 – July 2025) identifying aircraft utilising the proposed FL105-FL125 Controlled Airspace Structure (CAS) extension of CTA12. The change sponsor described the current operational performance in the area to the north of the London TMA, identifying where the base-step change between the CAS volumes of CTA11 and CTA12 are currently constraining ATCOs in their management of descents and where multiple vertical integration between arrival flows from the east (waypoint OFJES) and from the south (waypoint OXDUF) is necessary.	

4. Baseline Scenarios and Traffic Forecasts		**Yes/No**
4.1	Has the change sponsor developed the baseline scenarios for year 1 and year 10 by taking due consideration of known or anticipated factors that might affect it? *(CAP 1616f paragraph 3.12 – 3.13)*	Yes
	The change sponsor used the current day CAS design as the baseline for the options appraisal (Option 0 – Baseline (do nothing)). This	

	assumes no change to CAS base of CTA11. The change sponsor illustrated how the current base-step between CAS volumes CLN CTA11/12 (Class C) would continue to constrain ATCOs in their management of descents as effectively as required, where there is a need for multiple vertical integrations between the arrival flows from the east (OFJES) and from the south (OXDUF). The ACP will have no impact on traffic volumes, fleet mix, traffic distribution, instrument flight procedures, navigation waypoints or routes over the appraisal period.	
4.2	Has the change sponsor provided traffic forecasts for year 1 and year 10, indicating the traffic growth on the different routes as well as types of aircraft, particularly if a change in fleet mix is anticipated over the period of the forecasts? *(CAP 1616i paragraph 3.2 – 3.4)*	No
	The change sponsor only provided traffic forecasts in the wider context of the UK forecast growth from 2026-2035 in the engagement briefing pack. Explanatory text was included (section 6.1.6. of the Stage 3 submission), to explain how this data was derived, with the change sponsor stating that "*the airspace change is expected to have no impact to traffic levels*". The change sponsor also indicated that there is no anticipated change to traffic volumes, fleet mix, traffic distribution, instrument flight procedures, navigation waypoints or routes associated with this ACP. A Luton Airport specific growth forecast could have added additional wider context and allowed better assessment of the longevity and resilience of potential solutions; however, as it was previously agreed that qualitative methodologies would be sufficient for this scaled Level 2 ACP, and noting the proposed timescale for implementation (i.e., within 6 months) it was assessed that the additional work required would not be proportionate in terms of the value added.	

5. Final Airspace Design		**Yes/No**
5.1	Has the change sponsor described the final airspace design at year 1 and year 10 by taking into account any additional growth facilitated by the airspace change? *(CAP 1616f paragraph 3.18)*	Yes
	The final design, Option 2 (change to CAS FL105+), seeks to move the boundary between Clacton Control Areas CTA11 and CTA12 (Class C airspace) approximately 9.1nm to the east to waypoint OFJES. This would have the effect of lowering the base level of CTA12 from FL125 to FL105, aligning with CTA11 and providing two additional levels and greater tactical flexibility for ATCOs to integrate existing convergent traffic flows from the south and east. The ACP will have no impact on traffic volumes, fleet mix, traffic distribution, instrument flight procedures, navigation waypoints or routes over the appraisal period.	
5.2	To what extent does the final airspace design achieve any mandatory, discretionary, or bespoke environmental design principles?	Yes

	The change sponsor assessed the three design options against the Mandatory Design Principle (MDP) for Environment. The three design options were: • Option 0 – Baseline (do nothing) • Option 1 – Change to CAS below FL100 • Option 2 – Change to CAS FL105+ All three design options were evaluated to meet the MDP for Environment with no changes to greenhouse gas emissions anticipated for any of the options.	
5.3	Were there any design options other than the final airspace design that might have better met the environmental design principles and/or produced better environmental impacts as assessed in the full options appraisal? If so, is the rationale for rejecting those design options and selecting the final airspace design adequately explained?	No
	The three design options were evaluated qualitatively against the design principles at Stage 2. Option 0 and Option 1 failed to meet the MDP for Safety and therefore were discounted in line with the change sponsor's design principle evaluation (DPE) criteria. Therefore, following the DPE, Option 2 was taken forward as the final airspace design.	

6. Final Options Appraisal		**Yes/No**
6.1	Has the change sponsor conducted an options appraisal of the potential environmental impacts of the final airspace design against the baseline scenarios for the implementation year and across the forecast period (normally 10 years)? *(CAP 1616f paragraph 3.20)*	Yes
	The change sponsor conducted an options appraisal of the final airspace design against the baseline scenario. The appraisal was conducted on a qualitative basis with quantitative analysis scoped out due to the scaling applied to this Level 2 ACP. The proposed airspace change addresses an anticipated safety risk associated with airspace congestion and ATC complexity to the north of the London TMA associated with the convergence of Luton Airport arrivals from the east and south. The proposed airspace change is not anticipated to change traffic volumes or fleet mix. On this basis, the CAA determined that further quantified analysis based on traffic forecast data was not necessary.	

6.2	If a quantified and monetised environmental assessment has not been undertaken, has the change sponsor presented a robust rationale supported with appropriate evidence justifying that undertaking a specific metric or quantitative assessment of a proposed option would result in no environmental impact? *(CAP 1616i paragraph 2.17)*	Yes
	For the final design, Option 2 (change to CAS FL105+), the change sponsor provided a robust rationale to support the qualitative assessment that the impact on greenhouse gas emissions would be overall neutral. This was based on the assumption that the ACP will enable ATCOs to offer earlier and prolonged descents at reduced thrust settings and reduce the number of stepped descents under the current scenario, where aircraft alternate between short periods of descent and level flight which has an adverse effect on fuel burn and emissions. The change sponsor acknowledged that the actual degree of benefit would be dependent on airframe, operator, aircraft weight and environmental factors but made the case that it would be disproportionate to attempt to quantify and monetise the exact impact. The CAA accepts this position on the basis that the ACP is required to maintain a high level of safety and that the additional CAS remains a tactical environment.	
6.3	Has the change sponsor considered the environmental impacts resulting from its direct airspace operations as well as any environmental impacts caused due to indirect consequential changes on the flight behaviour of other airspace users? *(CAP 1616i paragraph 2.18)*	Yes
	The impacts on greenhouse gas emissions from direct airspace operations has been qualitatively evaluated by the change sponsor as being neutral. In terms of the indirect consequential changes on flight behaviour of other airspace users, the change sponsor stated that overall, the final design, Option 2 (change to CAS FL105+), was "*unlikely to cause greater fuel use and associated greenhouse gas emissions for traffic outside CAS (such as military and GA operations). However, it would also be unlikely to cause an improvement.*" This assessment is accepted by the CAA.	

7. Noise		**Yes/No**
7.1	Has the change sponsor considered and assessed the noise impacts resulting from the airspace change proposal as per the Government's environmental objectives and altitude-based priorities given in the Air Navigation Guidance 2017? *(CAP 1616i paragraph 2.4)*	N/A
	Proposed airspace change above 7,000 ft. with no anticipated impacts on noise.	

7.2	Where a quantified and/or monetised assessment for the following noise metrics has been undertaken, does the methodology follow the requirements given in Chapter 5 of CAP 1616i? • LAeq and TAG • Number above • Overflight	N/A
	N/A	
7.3	Has the change sponsor used operational diagrams overlaid on high-quality maps that are clearly legible and have sufficient details? *(CAP 1616i paragraph 5.37)*	N/A
	N/A	
7.4	Has the change sponsor presented additional analysis on any of the noise impacts using any additional noise metrics? *(CAP 1616i paragraph 5.40)*	N/A
	N/A	

8. Greenhouse Gas Emissions		**Yes/No**
8.1	Has the change sponsor considered and demonstrated how the design and operation of the airspace change proposal will impact greenhouse gas emissions? *(CAP 1616i paragraph 6.1)*	Yes
	The change sponsor demonstrated that the design and operation of the airspace change will have an overall neutral impact on greenhouse gas emissions. This is based on a qualitative assessment of direct and indirect impacts associated with the ACP, as agreed with the CAA. In terms of direct impacts of the airspace change, the change sponsor identified that the ACP would enable ATCOs to offer earlier and prolonged descents at reduced thrust settings and reduce the number of stepped descents under the current scenario, where aircraft alternate between short periods of descent and level flight which has an adverse effect on fuel burn and emissions. The actual degree of benefit, however, would be dependent on airframe, operator, aircraft weight and environmental factors. For indirect, consequential impacts of the airspace change, the change sponsor provided aviation statistical data for usage of the Class G	

	airspace relevant to the ACP which demonstrated that usage was limited, with very few General Aviation (GA) tracks displayed and very modest usage by United States Air Force in Europe (USAFE) aircraft. The assessment was also based on engagement with key stakeholders such as USAFE, the Ministry of Defence, and with other stakeholders comprising relevant airports, airlines, GA airfields and relevant National Air Traffic Management Advisory Committee (NATMAC) member organisations. Stakeholder feedback in response to the final design option highlighted that the airspace change was likely to have a "*minor adverse impact*". The change sponsor stated that overall, the final design, Option 2 (change to CAS FL105+), was "*unlikely to cause greater fuel use and associated greenhouse gas emissions for traffic outside CAS (such as military and GA operations). However, it would also be unlikely to cause an improvement.*" The CAA accepts this position on the basis that the ACP is required to maintain a high level of safety and that the additional CAS remains a tactical environment.	
8.2	Where a quantified and monetised greenhouse gas emissions assessment has been undertaken, does the methodology follow the requirements given in Chapter 6 of CAP 1616i?	N/A
	N/A	

9. Local Air Quality		**Yes/No**
9.1	Is there a possibility of pollutants breaching legal limits and target values following the implementation of the airspace change proposal (or worsening an existing breach of legal limits and target values)? *(CAP 1616i paragraph 7.5)*	N/A
	Proposed airspace change above 7,000 ft. with no anticipated impacts on local air quality.	
9.2	Where a quantified and monetised local air quality assessment has been undertaken, does the methodology follow the requirements given in Chapter 7 of CAP 1616i?	N/A
	N/A	

10. Tranquillity	**Yes/No**

10.1	Has the change sponsor considered and taken account of the impacts on tranquillity by using operational diagrams or overflight contours to identify any tranquillity receptors overflown below 7,000 feet? *(CAP 1616i paragraph 8.3)*	N/A
	Proposed airspace change above 7,000 ft. with no anticipated impacts on tranquillity.	

11. Biodiversity		**Yes/No**
11.1	Has the change sponsor used operational diagrams or overflight contours to identify any biodiversity receptors overflown below 7,000 feet? *(CAP 1616i paragraph 9.3)*	N/A
	Proposed airspace change above 7,000 ft. with no anticipated impacts on biodiversity.	
11.2	Has the change sponsor completed the habitats regulations assessment early screening criteria form and, where relevant, provided any additional assessments for habitats regulations assessment as specified by the CAA? *(CAP 1616f paragraph 3.69, 4.18, 5.24)*	Yes
	The change sponsor submitted the HRA early screening criteria at Stage 2 which confirmed no significant effects on European sites and hence, there was no requirement for any additional assessments.	
11.3	Is the airspace change proposal likely to have a significant effect - either alone or in combination with other plans or projects - on European sites? *(CAP 1616i paragraph 2.9)*	N/A
	N/A	

12. Linked Airspace Change Proposals		**Yes/No**
12.1	Is the airspace change proposal linked in any way with another airspace change proposal? *(CAP 1616i paragraph 2.20)*	N/A
	N/A	

12.2	If yes, have the environmental impacts of the linked proposals been assessed on a combined basis? *(CAP 1616i paragraph 2.21)*	N/A
	N/A	

13. Secretary of State Call-in Noise Criterion		Yes/No
13.1	Has the change sponsor presented their assessment as to whether the anticipated noise impacts meet the Secretary of State's call-in criterion? *(CAP 1616f paragraph 5.55)* *The criterion, as set out in the Civil Aviation Authority (Air Navigation) Directions 2023, Section 6, paragraph (7), and also present in the Air Navigation Guidance (2017), is that the proposed airspace change could lead to a change in noise distribution resulting in a 10,000 net increase in the number of people subjected to a noise level of at least 54 dB[1] as well as having an identified adverse impact on health and quality of life.*	N/A
	N/A	
13.2	Should there be a request for a call-in, does the airspace change proposal, as described, meet the call-in criterion for noise impacts? *(CAP 1616f paragraph 6.21)*	N/A
	N/A	

14. Public Evidence Session		Yes/No
14.1	If a public evidence session has been held, was any **new** evidence on potential environmental impacts of the airspace change proposal presented by stakeholders? *(CAP 1616f paragraph 6.27)*	N/A
	No public evidence session held.	
14.2	If so, was the new evidence reviewed and taken into account by the CAA's assessment of the environmental impacts of the airspace change proposal? *(CAP 1616f paragraph 6.29)*	N/A

[1] LAeq 16h noise exposure.

	No public evidence session held.

15. Conclusion

This airspace change proposal (ACP) seeks to move the boundary between Clacton Control Areas CTA11 and CTA12 (Class C airspace) approximately 9.1nm to the east to waypoint OFJES. This would have the effect of lowering the base level of CTA12 from Flight Level 12,500ft. (FL125) to Flight Level 10,500ft. (FL105), aligning with CTA11 and providing two additional levels and greater tactical flexibility for Air Traffic Controllers (ATCOs) to integrate the two flows associated with the convergence of Luton Airport arrivals from the east and south. The change sponsor states that *"a reduction in congestion and complexity would lead to ATC workload reduction and further improve safety in the region".*

The current proposal is for an airspace change above FL100 and has been assessed as a Level 2 ACP with proportionate scaling applied as per the nature of the proposed change. Therefore, only an assessment of CO_2 emissions is required and there is no explicit requirement for the change sponsor to assess other environmental aspects, including impacts on noise, local air quality, tranquillity, and biodiversity. Greenhouse gas emissions have been assessed qualitatively for both direct and indirect effects, concluding that the ACP will have an overall neutral impact.

On this basis, it has been assessed that the proposed change aligns with the Airspace Modernisation Strategy's strategic objective on environmental sustainability and reflects the Secretary of State's guidance on environmental objectives under section 70(2)(d) of the Transport Act 2000.

16. Recommendations/Conditions/Post Implementation Review Data Requirements		Yes/No
16.1	Are there any recommendations which the change sponsor **should try** to address either before or after implementation (if approved)? *(CAP 1616f paragraph 6.12)* *Recommendations are something that the change sponsor should try to address either before or after implementation, if indeed the airspace change proposal is approved. They may relate to an area in which the change sponsor is reliant upon a third party to actually come to an agreement and consequently they do not carry the same 'weight' as a condition.*	N/A
	N/A	
16.2	Are there any condition(s) which the change sponsor **must fulfil** either before or after implementation (if approved)? *(CAP 1616f paragraph 6.12)* *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*	N/A

	so will usually result in the approval being revoked.	
	N/A	
16.3	Are there any specific requirements in terms of the data to be collected by the change sponsor for the post implementation review (if approved)? *(CAP 1616f paragraph 8.9)* *PIR data requirements concern any specific data which the change sponsor should be instructed to collate post-implementation, if indeed the airspace change proposal is approved.*	N/A
	N/A	

Environmental Statement Sign-off	Name	Signature	Date
Environmental assessment completed by Airspace Regulator (Environment)	[redacted]	[redacted]	19/11/2025
Environmental assessment approved by Principal Airspace Regulator (Environment)	[redacted]	[redacted]	05/12/2025
Environmental assessment approved by Manager Airspace Regulation (or alternative delegation of authority)	[redacted]	[redacted]	8/12/2025