

DONCASTER SHEFFIELD AIRPORT AIRSPACE CHANGE PROPOSAL

ACP-2024-039



Stage 1 Design Principles Submission Document Appendix B

Stage 1 & Stage 2 Stakeholder Feedback December 2025-January 2026 Engagement

Version 1.0

From: [REDACTED]
Sent: 09 January 2026 11:52
To: Doncaster Sheffield Airport <DSA@doncaster.gov.uk>
Subject: RE: [External] REQUEST FOR FEEDBACK - Doncaster Sheffield Airport Airspace Change Proposal

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Good morning,

Thank you for your invitation to comment on Stages 1 and 2 of ACP 2024-039. On behalf of the UK Airprox Board I can confirm that the Board agrees with the Stage 1 Design Principles and suggests that, for Stage 2, consideration be given to the provision of a Lower Airspace Radar Service (LARS) for pilots of aircraft operating in Class G airspace in the environs of the proposed Class D airspace associated with the airport.

Yours

[REDACTED]



Director UK Airprox Board

[REDACTED]

From: [REDACTED]
Sent: 08 January 2026 18:27
To: Doncaster Sheffield Airport <DSA@doncaster.gov.uk>
Subject: Airspace Change Proposal 2024-039

Dear [REDACTED]

Thank you for sharing the engagement material and the accompanying recommendations. Having reviewed the information presented, I can confirm that I am supportive of the proposed approach.

I agree with the design principles outlined for Stages 1 and 2, as well as the recommendation to reinstate the previous controlled airspace structure and associated procedures as the initial design option. This provides a sensible and well-evidenced foundation for progressing the Airspace Change Proposal and supports the safe and timely reopening of Doncaster Sheffield Airport.

The Public Consultation completed in 2018, considered Noise Preferential Routes (NPRs) and the reinstatement of these routes would make sense and would link into the previous published departure and arrival procedures. As stated within the document, DSA operated for more than 17 years and I suspect the local communities have not changed significantly since the airport opened.

The previous airspace, considered General Aviation activities at Sandtoft, Gamston and Netherthorpe and provides a range of Visual Reporting Points (VRPs). Humberside Airport operated alongside DSA and I am not aware of any conflicts. However, the airport is situated within a complex part of UK airspace, which involves a range of general aviation, military and commercial movements. The reintroduction of controlled airspace is essential to ensure safe movement of all traffic.

I look forward to continued engagement as the ACP develops and to contributing further as the proposals move towards the next stages of consultation. The key issue is that the airport requires controlled airspace to ensure it can attract a wide range of airlines and operators to ensure the safe and efficient movement of aircraft.

Kind regards,

[REDACTED]

Chair, Airport Consultative Committee

[REDACTED]

From: [REDACTED]
Sent: 09 January 2026 09:58
To: Doncaster Sheffield Airport <DSA@doncaster.gov.uk>
Subject: RE: REQUEST FOR FEEDBACK - Doncaster Sheffield Airport Airspace Change Proposal

Good afternoon,

Thank you for sharing the initial engagement material. I have shared with a number of military airspace users who operate in the region and we have the following feedback.

Firstly, with regards the Current Day Scenario, there is no analysis of the surrounding airspace (classifications / restrictions / SUA), airspace usage, users, flight patterns, choke points etc to base line the change off, as ordinarily required in the CAP1616 process. This is of particular note as since the closure of DSA in 2022 a new danger area has been established in the vicinity of RAF Waddington, EGD324A/B, which abuts the Lincolnshire CTA up to FL195 for BVLOS operations and will have likely changed traffic patterns in the area when active. Also, generally speaking, since the removal of the DSA CTA/R traffic patterns and routings will have inevitably changed as that airspace was made available. Historical data doesn't tell us the volume and patterns of traffic currently operating in the area and without this analysis it is difficult to fully assess the impact of the ACP.

A few specifics based off what is currently presented:

The section of the proposed CTA that encroaches into the Lincolnshire AIAA (2000ft-FL60) will reduce the space available for general handling for 3 FTS from RAF Cranwell.

Reduction in the Class G airspace under Y70 will create a potential bottleneck for traffic transiting to and from the Vale of York from East Anglia / Lincolnshire.

Reduction of the northerly transit routes west of the Trent will create a possible pinch point for military traffic transiting that way.

The design principals are sound but the consensus is that the design should aim to achieve the minimum possible airspace required to provide a safe and efficient operating area for DSA based on analysis of the *current day* usage of the surrounding airspace.

On a positive note, Cranwell did identify potential benefits for them with an increase in air traffic provision in the area and would wish to engage with DSA operators at a suitable juncture to discuss mutual opportunities, for example practise diversions to provide training for both aircrew and controllers; as well as the use of DSA as a div.

We look forward to continued engagement as this ACP progresses.

Regards

[REDACTED]

[REDACTED] /Defence Airspace and Air Traffic Management / [REDACTED]
[REDACTED]

From: [REDACTED]
Sent: 07 January 2026 15:11
To: [REDACTED]
Subject: FW: REQUEST FOR FEEDBACK - Doncaster Sheffield Airport Airspace Change Proposal

Afternoon,

This is the NATS NERL plc feedback to Airspace Change Proposal 2024-039

- Question 1

NATS NERL plc has no comment on the proposed Design Principles.

- Question 2:

Unfortunately, NATS NERL plc cannot support the proposed approach to reinstate DSA's previous controlled airspace, procedures, Noise Preferential Routes and associated arrangements exactly as they were when the airport was last operational. This is for the following reasons,

NATS NERL plc does not believe this will provide the most optimal solution to meet DSA's design principles.

NATS NERL plc has been working with other Airports within the MTMA under ACP-2019-77 which is currently at Stage 3. The reinstatement of DSA's previous controlled airspace , procedures and Noise Preferential Routes would be at odds with the work already undertaken and create conflicts within the current FASI MTMA cluster. This would require DSA's proposal to be coordinated with the MTMA cluster and would create a risk that it may not be possible to deploy DSA's change ahead of the MTMA cluster. The MTMA cluster is due to be deployed in 2030, which is in line with the Government's open letter on NATS prioritisation. However, through engagement with NATS NERL plc, we believe that there may be a more optimal solution which will meets DSA's design principles and reduce the scale of future change. We would welcome a meeting with the sponsor to discuss their proposals.

The En-route network in the vicinity of DSA has become a Network Hotspot. This could be a good opportunity to revise procedures and develop new ways of working that could support future growth in your Area of Interest.

Regards

[REDACTED]

NATS

[REDACTED]

My normal working hours are Tuesday-Friday, 07:15-16:00

I have adopted flexible working - so whilst it suits me to email now, I do not expect a response or action outside of your own working hours

From: [REDACTED]
Sent: 07 January 2026 17:21
To: Doncaster Sheffield Airport <DSA@doncaster.gov.uk>
Subject: RE: REQUEST FOR FEEDBACK - Doncaster Sheffield Airport Airspace Change Proposal

Dear [REDACTED]

Thank you for your email and the opportunity to respond to this initial consultation on Doncaster Sheffield Airport's Airspace Change Proposal.

[REDACTED]

We agree that commercial airlines cannot operate from Doncaster Sheffield Airport (DSA) without the restoration of controlled airspace, flight procedures, and air traffic control services. As the consultation points out, DSA is close to other major airports in the Manchester Terminal Manoeuvring Area. Controlled airspace is essential to ensure safe and efficient passenger operations.

We support the five proposed design principles. Given DSA's location it is important that the ACP should consider the impacts on air navigation service providers, nearby airport operators, and other aviation stakeholders. Furthermore, we agree that as the Noise Preferential Routes (NPRs) for DSA departures were established through public consultation as recently as 2018, it makes sense to reinstate them as they were operating prior to closure.

Based on our previous positive experience operating safely and efficiently at DSA, we think it makes sense to simply reinstate the same controlled airspace structure and flight procedures that were in operation before the airport closed in 2022. We welcome the proposal for the airport to operate on a 24-hour basis as before; with night operations managed through a Night Noise Quota System. Commercial airlines need to be able to both meet consumer demand and operate a cost-efficient flying programme, which for most carriers does require early morning departures and some late evening and nighttime arrivals. While there may be opportunities for changes to be explored during this lengthy consultation process, we do not have any initial suggestions at this stage.

Your sincerely

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 13 January 2026 15:54
To: Doncaster Sheffield Airport <DSA@doncaster.gov.uk>
Subject: CAP1616 Stage 1/Stage 2 consultation for ACP-2024-039 Doncaster-Sheffield Airport -Response from MAG
Importance: High

Afternoon

I am mailing in response to the CAP1616 Stage 1/Stage 2 consultation for ACP-2024-039 Doncaster Sheffield Airport which began on Wednesday 3rd December 2025 and runs until Wednesday 14th January 2026.

In the text below we have itemised the questions posed and provided answers where appropriate on behalf of MAG. MAG operate airports in the Northwest (Manchester Airport), East Midlands (East Midlands Airport) and South East (London Stansted Airport) of England. As such this MAG response covers our experience of operating airports across England.

Doncaster-Sheffield Airport Stage 1 Engagement

For Stage 1, we are inviting feedback stakeholders on our proposed design principles:

1. The airspace change proposal must maintain a high standard of safety and should seek to enhance current levels of safety.
2. The airspace change proposal should not be inconsistent with relevant legislation, the CAA's airspace modernisation strategy or Secretary of State and CAA's policy and guidance.
3. The airspace change proposal should deliver the Government's key environmental objectives with respect to air navigation as set out in the Government's Air Navigation Guidance 2017.
4. The airspace change proposal should consider the impacts on air navigation service providers and other aviation stakeholders such as nearby airport operators.
5. The airspace change proposal should not modify DSA's previous NPRs unless required

MAG response

The first three Design Principles align to the three Mandatory Design Principles outlined in [CAP1616v5.1/CAP1616F](#). Design Principle 3 does though state alignment to the Governments Air Navigation Guidance 2017. However, the timing of the Stage 2 Gateway (30th April 2026) coincides with the expected implementation of the revised Air Navigation Guidance that is currently being consulted upon. Doncaster Sheffield Airport may wish to change the wording to an alignment to published 'Air Navigation Guidance'.

We note that one of the remaining Design Principles is taken from the Discretionary Design Principles (in [CAP1616v5.1/CAP1616F](#)) and the other is a Bespoke Design Principle. We welcome Design Principle 4 as the Future Airspace Strategy Implementation Airspace Change Proposals at Liverpool John Lennon, Leeds Bradford, Manchester, and East Midlands Airports (the Manchester Terminal Manoeuvring Area MTMA 'cluster') are already well advanced. MAG has observed multiple delays, in the last two years, with work in the MTMA cluster. MAG welcome the commitment of Doncaster Sheffield Airport to not impede progression further through this Airspace Change Proposal/their reopening.

Doncaster-Sheffield Airport Stage 2 Engagement

For Stage 2, we are inviting feedback from stakeholders on the initial design option described in this document

The area of controlled airspace and proposed operation seems practical. As outlined in response to the Stage 1 Engagement question (above) we would urge Doncaster Sheffield Airport to be mindful of the, already well progressed the Future Airspace Strategy Implementation in the Manchester Terminal Manoeuvring Area (MTMA) 'cluster'. The design sought by Doncaster Sheffield Airport should cause no change to the Future Airspace Strategy Implementation Airspace Change Proposals underway by Liverpool John Lennon, Leeds Bradford, Manchester and East Midlands Airports.

If anything is in anyway unclear, please let us know and we will be happy to provide clarification. It only remains for me to congratulate Doncaster Sheffield Airport, on behalf of all at MAG, on progressing your plans to reopen and wish you every success in your endeavours.

Best wishes

[Redacted]
[Redacted]
Stansted Airport | East Midlands Airport | Manchester Airport

[Redacted]

W: www.manchesterairport.co.uk/futureairspace | www.stanstedairport.com/futureairspace | www.eastmidlandsairport.com/futureairspace



From: [REDACTED]
Sent: 12 January 2026 12:21
To: Doncaster Sheffield Airport <DSA@doncaster.gov.uk>
Subject: Feedback Doncaster Sheffield Airport ACP 2024-039

Good afternoon,

Thanks for the invitation to feedback on the Doncaster Sheffield Airport ACP 2024-039

Please find our response attached.

Kind Regards

[REDACTED]
ATC Airspace Change Coordinator
Leeds Bradford Airport.

[REDACTED]
[REDACTED]

 **Leeds Bradford Airport**
From the heart of Yorkshire



Leeds Bradford Airport Stakeholder Feedback to the Doncaster Sheffield ACP 2024-39 Consultation Documentation

1. Introduction

This report details Leeds Bradford Airports stakeholder response to the engagement document "DSA ACP Stage 1 and 2 Engagement Document" submitted by City of Doncaster Council (CDC) as the Change Sponsor for ACP-2024-039.

ACP 2024-039 is intended to cover the stakeholder engagement requirements for Stage 1 (Define) and Stage 2 (Develop and Assess) of the CAP 1616 airspace change process. While the document provides a useful overview, our assessment identifies several areas where the proposal, as presented, does not conform with the mandatory requirements and defined procedures of CAP 1616 version 5.1. We believe that these non-conformities must be addressed before a combined Stage 1/2 Gateway submission can be accepted for assessment.

2. Stage 1: Define – Inadequate Current Day Scenario (Para 3.10, CAP 1616)

CAP 1616 Requirement: "***The change sponsor must describe the current-day scenario.***" (Para 3.10). This forms a fundamental baseline against which the need for change and the impacts of options are measured.

The document describes the physical and operational current situation (airport unlicensed, no commercial flights). However, it fails to describe the current-day airspace scenario as required. There is no analysis of how the wider airspace network currently functions without DSA's controlled airspace, including current traffic flows, patterns of other airspace users (e.g., general aviation, military), and the existing environmental (particularly noise) baseline for communities in the region.

Without a robust current-day airspace scenario, it is impossible to accurately assess the need for the change, to develop meaningful design principles, or to appraise the impacts of any design option against a valid baseline. This undermines the evidence-based foundation of the entire process.

3. Stage 1: Define – Incorrect and Insufficient Design Principles (Paras 3.11, CAP 1616)

The sponsor must use the three Mandatory Design Principles (MDPs), consider using the Discretionary Design Principles (DDPs), and consider developing Bespoke Design Principles (BDPs) (Para 3.11). The output must be a "list of design principles" (Para 3.11).

The document lists the MDPs verbatim but presents them as questions for stakeholder agreement (Page 13). This is procedurally incorrect. The MDPs are not for stakeholder agreement; they are mandatory requirements that the proposal must demonstrably satisfy. Stakeholder engagement in Stage 1 should focus on informing and refining non-mandatory (discretionary and bespoke) principles.

The sponsor states it reviewed 18 DDPs and selected only one: DDP Technical. No rationale is provided for rejecting the other 17, many of which are highly relevant (e.g., DDPs related to efficiency, capacity, access, predictability, and resilience). CAP 1616 requires sponsors to "consider using the discretionary design principles". The document must demonstrate that consideration, including justification for why specific DDPs are not adopted.

The proposed BDP on Noise Preferential Routes (NPRs) states the "ACP should therefore not change DSA's existing NPRs unless this is necessary..." (Page 3). This is a pre-determination that contradicts the purpose of Stage 2 (developing and assessing options) and Stage 3 (consultation). A design principle should be an objective criterion for evaluation (e.g., "minimise community noise impact"), not a pre-emptive design constraint that prohibits change. Furthermore, NPRs are outside the formal scope of CAP 1616 (Para 1.36), so a principle governing them is of questionable relevance to the CAA's regulatory assessment.

We believe that the design principles framework is flawed. It misapplies mandatory requirements, fails to demonstrate proper consideration of discretionary principles, and includes a bespoke principle that could unduly restrict objective option development. This risks the subsequent Design Principle Evaluation (Stage 2) being ineffective or biased.

4. Stage 2: Develop and Assess – Single Design Option & Lack of Developed Baseline Scenarios (Paras 3.15, CAP 1616)

CAP 1616 Requirement states that "The sponsor must develop a list of design options" (Para 3.15) and must "provide evidence and supporting rationale to justify where single or limited design options are presented." The sponsor must also develop baseline scenarios for the year of implementation and 10-years after, both with and without the airspace change proposal.

The sponsor presents only one initial design option: reinstatement of the pre-2022 airspace. The justification provided ("most practical starting point... proven design... quickest way") is operational and programmatic, not evidence-based in terms of airspace design. CAP 1616 requires a justification rooted in the airspace change process itself (e.g., that other options were considered and discounted on technical or safety grounds following stakeholder engagement). Presenting a single option at this stage severely limits meaningful stakeholder feedback and objective appraisal.

No credible alternatives have been explored or presented for stakeholder consideration. Specifically, modern airspace design techniques—such as the use of RNP AR, RF (Radius to Fix) procedures combined with steeper minimum climb/approach gradients could enable a more flexible, efficient, and less restrictive airspace structure. These techniques can maintain safety while reducing the geographic footprint of controlled airspace. By not exploring these modern, performance-based alternatives, the sponsor has not demonstrated that its proposal is the optimal solution, breaching the fundamental requirement of the 'develop and assess' stage."

5. Future Baseline Scenarios

The future baseline scenarios ("year of implementation without the ACP" and "10-years after without the ACP") are not developed. The document only references traffic forecasts returning to 2022 levels by 2032. There is no description of how the *airspace* would evolve over the next decade without DSA's controlled airspace, considering other regional changes (e.g., the referenced Manchester TMA modernisation).

A single, pre-selected option does not demonstrate that alternatives have been properly explored to find the optimal solution. The lack of future baselines prevents a proper comparison of the option's impacts over time.

6. Stage 2: Develop and Assess – Missing Methodological Framework for Initial Options Appraisal (Para 3.18, CAP 1616)

The engagement document makes no reference to the methodology or scope of the forthcoming IOA. Stakeholders cannot provide informed feedback on a design option if they do not understand the criteria (beyond the stated design principles) and metrics against which it will be appraised.

Transparency is a key principle (Para 1.30). Failing to outline the appraisal methodology at the point of seeking stakeholder feedback on options deprives stakeholders of the context needed to provide meaningful input. It also means the sponsor cannot yet demonstrate it has a plan to meet this core Stage 2 requirement.

7. Lack of Proportionality in the Proposed Airspace Design

The sponsor proposes to reinstate a large and complex Class D/E controlled airspace structure originally designed for a busier operational concept.

The original airspace structure was designed to accommodate 2.3-2.5 million passengers annually. These figures were extremely optimistic, with passenger numbers peaking at around 1.4 million in 2019.

Based on the DSAACP consultation document, the 1.4 million passenger peak resulted in 11,569 Air Transport movements (ATM). Based on these figures, the projected ATM numbers which the airspace was initially designed for would have been around 18,000 ATM annually.

The ACP consultation document states that “*With the first new passenger services expected to begin in 2027/28, current forecasts indicate that DSA will return to its previous 2022 Air Transport Movement levels from around 2032*”. The 2022 annual ATM movements were 7,966, **around 44% of the movements that the original large area of Controlled Airspace was designed for.**

The current traffic forecasts (c. 8000 ATM movements/year by 2032) and the phased reopening do not justify a structure of this scale and classification. The proposal is a 'copy-paste' of a historical design which was designed to accommodate a hugely optimistic figure of 18,000 ATM per year. We consider that this proposal is not one proportionately scaled to the actual, near-term need. This could unnecessarily restrict other airspace users for marginal safety benefit.

It is our opinion that DSA should produce some further realistic airspace options, downsized to accommodate the projected lower number of ATM numbers than the original ACP was designed for.

8. Failure to Integrate with or Consider Impact on Strategic Airspace Change Programmes

The sponsor acknowledges the existence of the Manchester TMA FASI (Future Airspace Strategy Implementation) project but has made no attempt to demonstrate how its proposed historical airspace aligns with or supports this critical modernisation programme. Reinstating a legacy structure in this key region risks creating a 'lock-in' effect, potentially delaying, or necessitating costly rework of the FASI design. This represents a failure to carefully consider the 'impacts on...other aviation stakeholders' (their own DDP) and is inconsistent with the strategic intent of the Airspace Modernisation Strategy.

9. Unsubstantiated Need and Pre-Determination

a. The consultation document claims that "airlines have been clear they cannot operate without...controlled airspace" is presented without evidence. Multiple UK airports with similar traffic profiles operate safely and successfully without such extensive controlled airspace. The sponsor should provide the specific safety or operational evidence submitted by these airlines to justify this absolute requirement of airspace of the original dimensions.

b. Slide 10 of the DSA Assessment Meeting Presentation states "*Longer-term growth projections anticipate passenger throughput reaching approximately 2.5 million passengers per annum (mppa) by ten years after the restart of operations. **These figures are consistent with the airport's previous performance prior to closure.***"

We believe that the above figures are inaccurate. The CAA Terminal and Transit Passengers Publication for 2019 states that only 1,407,862 passengers passed through DSA in it's busiest year, far short of the 2.5 million figures shown in the presentation.

c. Slide 12 of the DSA Assessment Meeting Presentation states "***CDC and Government expectations are that airspace reinstatement should be expedited so that airline engagement and operational planning can proceed on schedule and enable the safe recommencement of commercial operations from 2027.***"

The sponsor's justification for expediting the process and limiting option development appears to be commercial and political pressure. The CAP 1616 process is designed to be an objective, evidence-based regulatory exercise, not a tool to validate pre-determined commercial or political outcomes. Attempting to shortcut the process on this basis undermines its integrity.

10. Insufficient Information for a Proper Impact Assessment (Safety, Operational, Economic)

CAP 1616 contains requirements for Initial Options Appraisal, including impacts on other airspace users (Para 3.18, 3.24).

The submission lacks the necessary detail for stakeholders or the CAA to assess the proposal's cumulative impact on the wider airspace network. There is no analysis of how the reinstated structure will interact with the Leeds Bradford arrival/departure flows, military training areas, or general aviation routes to the north. This omission prevents a proper assessment of:

Safety: The potential for complexity and increased controller/pilot workload at the boundary.

Operational Efficiency: Risk of delays or rerouting for flights operating to Leeds Bradford Airport.

Economic Impact: Potential negative impact on the efficiency and competitiveness of our operations.

The sponsor has failed in its duty to 'consider both the direct and consequential impacts' (Para 2.43)."

11. Summary

In summary, Leeds Bradford Airport considers the current submission for ACP-2024-039 to be fundamentally deficient and non-compliant with the CAP 1616 process. The proposal is built on an incomplete baseline, a flawed and predetermined design framework, and a single, historically derived option that is neither proportionate to the forecast demand nor aligned with modern airspace design principles. Critically, the sponsor's attempt to expedite the process via a combined Stage 1/2 Gateway assessment, justified by commercial timelines, risks undermining the sequential integrity and evidential rigour that CAP 1616 is designed to ensure.

From: [REDACTED]
Sent: 08 January 2026 15:22
To: Doncaster Sheffield Airport <DSA@doncaster.gov.uk>
Cc: [REDACTED]
Subject: GAA Response / Feedback ACP-2024-039

Dear Sirs,

Please find attached feedback from the General Aviation Alliance regarding the combined Stage 1 & 2 documentation.

We look forward to reviewing any further documentation at Stage 3 (Consultation).

Kind Regards

[REDACTED]
acp program manager



From: Doncaster Sheffield Airport <DSA@doncaster.gov.uk>
Date: Thursday, 8 January 2026 at 16:10
To: [REDACTED]
Cc: Doncaster Sheffield Airport <DSA@doncaster.gov.uk>
Subject: FW: GAA Response / Feedback ACP-2024-039

DONCASTER SHEFFIELD AIRPORT ACP-2024-039

GAA Response to Stage 1 & Stage 2

The many statements within the combined Stage 1 & 2 documentation that suggest that the complete restoration of the previous DSA controlled airspace (CAS) are 'essential' for the airport to re-open **are not correct.**

The "do nothing" scenario is to re-open the airport as an unlicensed facility. Many air taxi operators (and other General Aviation) do not require CAA licensed aerodromes.

The next step up from "do nothing" is to "do minimum". This would require DSA to meet the requirements set by the CAA for a licensed aerodrome. Licensed aerodromes require neither Controlled Airspace nor instrument arrival or departure procedures to be in place.

Instrument Approach Procedures (IAPs) and Noise Preferential Routes (NPRs) do not automatically require Controlled airspace to be in place.

There are many examples of licensed aerodromes within the UK and Europe that safely operate commercial public transport flights with traffic numbers and densities far higher than estimated for initial operations at DSA without any requirement for the establishment of Controlled Airspace.

For example,

In 2023 Exeter Airport had a total of 27,082 movements of which 6,502 were Air Transport.

In the same year Biggin Hill Airport had a total of 40,744 movements of which 15,815 were Air Transport.

Neither airport currently has any associated controlled airspace, although both have Instrument approach procedures and Biggin Hill airport also has established departure routes.

DSA's request to re-establish preexisting CAS in total is not proportionate at this stage. It is not a requirement for the airport to re-open, and it is not a requirement for aerodrome licensing.

The establishment of Controlled Airspace is NOT proportionate and nor is it a requirement for Air Transport operations to safely commence. This is particularly true for the low traffic levels envisaged initially.

At this stage DSA's ACP should concentrate on the re-establishment on the introduction of Instrument Approach Procedures alone.

Until such time as traffic levels and density of traffic using DSA justifies the establishment of Controlled Airspace, it should not be implemented.


ACP Program Manager

General Aviation Alliance.

08Jan26

From: [REDACTED]
Sent: 26 December 2025 17:51
To: Doncaster Sheffield Airport <DSA@doncaster.gov.uk>
Subject: REQUEST FOR FEEDBACK - Doncaster Sheffield Airport Airspace Change Proposal

To:
[REDACTED]
Programme Director - SY Airport City Corporate Services

Dear [REDACTED]

Please find attached the British Gliding Association (BGA) response to your request for feedback on you Stage 1 & Stage 2 Engagement document for ACP-2024-039

Hopefully the response is self explanatory but please do contact me either at this email address or by phone if there is anything you wish to discuss.

As mentioned in the response document I will be separately providing a contact list for those gliding community members that should be included in addition to the BGA on your stakeholder list for any future consultation or focus group activity related to this ACP.

Kind regards

[REDACTED]

[REDACTED]

British Gliding Association (BGA) response to City of Doncaster Council (CDC) ACP-2024-039 Stage 1 & 2 Engagement

Introduction

The BGA represents all 76 of the UK's gliding clubs and the owners, pilots and operators' of 2200 gliders, TMGs and towplanes. There are six gliding clubs in the area surrounding DSA and in addition, significant numbers of gliders from other clubs regularly transit the area on cross-country flights when soaring conditions allow.

We thank CDC for the opportunity to respond to the Stage 1 & 2 Engagement Document and are encouraged that you recognise the importance of this area to the gliding community and identify us as a key stakeholder in this ACP.

Initial Design Option

We understand the purpose of this Airspace Change Proposal (ACP) is to re-establish the Controlled Airspace (CAS) at Doncaster Sheffield Airport (DSA) as it was prior to the airport's closure in 2022 and the reversion of the CAS to Class G.

In your Statement of Need (SofN) You state that your aim is to use the re-established CAS to attract potential new airport operators and airlines. You also state that "restoring" the CAS is essential to allow the reopening of the airport.

DSA CAS to 2022

Following its opening in 2005, an ACP for Class D CAS was approved by the CAA in early 2008. The CAS was implemented at the end of July that year. The rationale for submitting the ACP had been that in 2006 DSA was, with 976k passengers that year, approaching what the CAA considered to be at the time a suitable benchmark, of 1m passengers per annum, for looking at the **possible** requirement for CAS at DSA.

It should be noted that the ACP was conducted under CAP725. This process was replaced by CAP1616 as it was generally recognised to not provide appropriate opportunities for stakeholder input and to lack transparency of decision making.

DSA did break the 1m threshold in 2007 (1.07m) but after that passenger numbers never reached 1m again until 2016. A level above 1m was maintained for a further three years, peaking at 1.4m in 2019. Numbers then dropped significantly in 2020 and 2021 due to Covid and Brexit. Post Brexit numbers rose again but didn't break the 1m threshold before the airport's closure in 2022. One result of Brexit was significantly reduced traffic to and from eastern Europe, one of DSA's then resident airline's key markets.

The size of the DSA CAS was partly driven by a then CAA requirement that all departure, arrival and holding procedures should be contained by CAS. In the Post Implementation Review (PIR) of the CAS implementation, the CAA acknowledged that while the airspace was designed in accordance with its interpretation of ICAO airspace

design principles at the time, the interpretation and hence requirement had changed and containment was no longer deemed essential. That is still the case.

Size was also influenced by DSA's prediction of continued passenger number growth; up to 2m by 2008, 4m by 2010 and between 4.4m and 6.6m by 2016. The CAA's records of annual passenger numbers show that throughout the eighteen years the airport operated, DSA only achieved passenger levels that were between 15% and 30% of those optimistic predictions. Appendix A below shows the actual annual passenger numbers achieved over the whole life of the airport.

Not surprisingly, given the numbers, throughout the years when that CAS was in place it was clear to any passing pilot that there was very little traffic in and out of the airport and that the CAS was totally disproportionate to usage.

There is, on record, recognition by the CAA that given DSA's traffic levels, the CAS could have been reduced by up to 70% and still achieved its aims. DSA recognised the problem itself and in 2015 produced an options paper which looked at several options to reduce and modify the CAS. In the PIR the CAA acknowledged that many of these aligned with its thinking and modern airspace design techniques. Notwithstanding that, to introduce such changes would have required a further ACP and there appeared to be no appetite for that at the time.

You ask for a response to the following question:

Q. Are there any modifications to the airspace dimensions, classifications or flight procedures described in the initial design option?

A. The BGA does not believe that there can be any justification for the controlled airspace construct proposed in your initial design option.

While it might appear to be the easiest option, and a way of potentially attracting airlines to DSA, reinstating what was recognised by DSA itself, the CAA and other stakeholders to be a seriously flawed CAS structure cannot be the right place to start.

The CAS was far larger and more complex than was ever needed for the passenger and traffic levels achieved at DSA. In addition, it caused significant funnelling and increased risk to GA traffic that was unable or unwilling to cross it by forcing them to divert to the east and west of the CAS. It had a similar effect to the north by funnelling additional traffic into what was already an Area of Intense Aviation Activity (AIAA).

Prior to 2008, DSA operated perfectly well with only an Aerodrome Traffic Zone (ATZ) in place with air transport movements and passenger levels that, apart from four years, continued more or less unchanged throughout the eighteen years the airport was operating. It should be noted that other airports have operated with an ATZ without CAS with ATM numbers higher than those ever achieved at DSA.

In your engagement document you now state that: *“forecast modelling indicates a return to pre-closure traffic volumes within approximately five years of full commercial operations commencing (by 2030–2031). Your longer-term growth projections anticipate passenger throughput reaching approximately 2.5m passengers per annum by ten years (2037-2038) after the restart of operations. These figures are consistent with the airport’s previous performance prior to closure”*.

You are predicting that DSA will, over the next five/six years, achieve traffic and passenger levels that will be at or below those prior to closure. They may well not need anything more than an ATZ. If a demonstrable need for CAS beyond that does emerge and the ten-year forecasts are approached, DSA will still not require structures of anything like the size or complexity in place before closure.

One aim of this ACP should be “to achieve an appropriate airspace configuration that is mutually acceptable to all parties using the area whilst assuring effective air traffic management throughout.”

Modern airspace design techniques and the more accurately flown arrivals and departures that are now achievable through precision navigation, will allow much smaller, less complex and flexible CAS which can still meet DSA’s aims while minimising risk and disruption to other users of the local airspace.

You also ask for our response to:

Q. Do you agree with our proposed Design Principles as set out below?

- a. The ACP must maintain a high standard of safety and should seek to enhance current levels of safety.
- b. The ACP should not be inconsistent with relevant legislation, the CAA’s Airspace Modernisation Strategy or Secretary of State and CAA’s policy and guidance.
- c. The ACP should deliver the Government’s key environmental objectives with respect to air navigation as set out in the Government’s Air Navigation Guidance 2017.
- d. The ACP should consider the impacts on air navigation service providers (ANSPs) and other aviation stakeholders such as nearby airport operators.
- e. This ACP should therefore not change DSA’s existing NPRs unless this is necessary to support safe operations or integration with other airspace structures.

A. The BGA believes that the proposed Design Principles are focussed exclusively on the needs of commercial air transport to the exclusion of the wider aviation community

Airspace modernisation is expected to improve access to airspace for General Aviation by enabling greater integration (rather than segregation) of different airspace user groups.

We note that the discretionary Design Principle at d. above considers the impacts on ANSPs and other stakeholders such as airports. In your detailed text you also say it must align with NATS Manchester Terminal Manoeuvring Area (MTMA) proposals. While all of this may well be correct, the Design Principle is very focussed on commercial air transport needs rather than the wider aviation community.

It is our view that at least two additional Design Principles are required that specify:

“Any airspace structure(s) arising from the ACP should be of the minimum size and lowest classification needed to achieve its aims.”

and,

“Any airspace structure(s) arising from this ACP should minimise disruption and maximise accessibility for other airspace users both inside the proposed airspace and around it”.

The BGA, our regional group (the Regional Airspace Soaring Group) and the local gliding clubs will be more than happy to provide constructive input to your evolving design options at the appropriate stages via the CAP1616 process that you’re following. They should all be added to your stakeholder list. We will provide contact details separately.


British Gliding Association

Appendix A

Doncaster Sheffield Airport – Annual Passenger (PAX) and Air Transport Movement (ATM) statistics for the 18 years the airport operated.

YEAR	ACTUAL TERMINAL PASSENGER NUMBERS (PAX)	ACTUAL AIR TRANSPORT MOVEMENTS (ATM)
2005	601k	5380
2006	899k	7591
2007	1.1m	9273
2008	968k	7881
2009	835k	6550
2010	876k	7273
2011	822k	6163
2012	693k	4718
2013	690k	4634
2014	724k	5430
2015	857k	5945
2016	1.2m	10734
2017	1.3m	10804
2018	1.2m	9856
2019	1.4m	11569
2020	339k	4597
2021	309k	5468
2022	959k	7966

FW: REQUEST FOR FEEDBACK - Doncaster Sheffield Airport Airspace Change Proposal

From Doncaster Sheffield Airport <DSA@doncaster.gov.uk>

Date Tue 13/01/2026 11:56

To [REDACTED]

Cc Doncaster Sheffield Airport <DSA@doncaster.gov.uk>

From: [REDACTED]

Sent: 09 January 2026 11:46

To: Doncaster Sheffield Airport <DSA@doncaster.gov.uk>

Subject: Re: REQUEST FOR FEEDBACK - Doncaster Sheffield Airport Airspace Change Proposal

Dear [REDACTED]

Thank you for your email.

At this stage Sherburn Aero Club sees no issues with the Doncaster Airport Airspace Change proposal. However, the Sherburn Aero Club - DSA Letter of Agreement will need reviewing for our airfield Instrument Approach Procedure.

Do you agree with our proposed Design principles as set out below? - YES

Are there any modifications to the airspace dimensions, airspace classifications or flight procedures described in the initial design option that you would suggest - NO

Please don't hesitate to contact me on tel: [REDACTED] if you have any further questions.

Kind regards

[REDACTED]
Head of Training



SHERBURN AERO CLUB
The Airfield
New Lennerton Lane
Sherburn in Elmet
Leeds LS25 6JE
www.sherburnaeroclub.com

From: [REDACTED]
Sent: 14 January 2026 21:32
To: Doncaster Sheffield Airport <DSA@doncaster.gov.uk>
Subject: Re: REQUEST FOR FEEDBACK - Doncaster Sheffield Airport Airspace Change Proposal

Dear [REDACTED]

Thank you for your reminder regarding Stage 1–2 engagement for ACP-2024-039 concerning the creation of controlled airspace (CAS) for the currently closed Doncaster Sheffield Airport.

The British Hang Gliding and Paragliding Association (BHPA) is the national governing body representing approximately 7,000 active pilots flying hang gliders, paragliders and their powered variants (including paramotors) in the UK. While most UK hang gliding and paragliding pilots are BHPA members, a proportion of the UK paramotor community operates independently of the BHPA. As a result, neither engagement nor safety communications can be assumed to reach all affected pilots through the BHPA alone, and therefore any potentially affected local groups need to be identified by yourselves and approached directly.

We have two concerns regarding whether the CAP1616 process has been followed correctly and proportionally:

1. The consultation documentation has not been posted onto the CAP1616 web portal as it should have been as soon as it was published,
2. Allowing such a short time window for responses which also included the Christmas and New Year holiday period was inappropriate.

Our members operate from hills, sea cliffs, licensed and unlicensed aerodromes, tow sites and agricultural fields, from the surface to cloudbase, both singly and in gaggles of multiple soaring aircraft. They do not routinely carry airband radios or transponders. CAS changes, and the assumptions that often accompany them regarding electronic conspicuity or ATC interaction, therefore carry a materially higher risk of exclusion and consequential degraded safety outcomes for our pilots compared to many other airspace users.

You ask for responses to the various Design Principles:

Principle 1: Safety. The airspace change proposal must maintain a high standard of safety and should seek to enhance current levels of safety.

Agreed subject to an amendment. Add the following text so that it reads:

“The airspace change proposal must maintain a high standard of safety and should seek to at least maintain current levels of safety, including an assessment of negative consequences for any activities within 20 nm of the proposed Controlled Airspace’s boundaries.”

The current "reinstatement" proposals do not meet this Principle before it is rewritten, let alone with the proposed amendment.

Principle 2: Legislation & Airspace Modernisation Strategy (AMS). The airspace change proposal should not be inconsistent with relevant legislation, the CAA’s

airspace modernisation strategy or Secretary of State and CAA's policy and guidance.

Agreed. However the current "reinstatement" proposals are most definitely not in-line with the AMS.

Principle 3: Environmental Objectives. The airspace change proposal should deliver the Government's key environmental objectives with respect to air navigation as set out in the Government's Air Navigation Guidance 2017.

Agreed. However the current "reinstatement" proposals are most definitely not in-line with this Principle.

Principle 4: Impact on Other Stakeholders. The airspace change proposal should consider the impacts on air navigation service providers and other aviation stakeholders such as nearby airport operators.

Agreed subject to an amendment. Amend the text so that it reads:

"The airspace change proposal must consider the impacts on air navigation service providers and other aviation stakeholders, including all current users operating within 20nm of the proposed Controlled Airspace's boundaries."

The current "reinstatement" proposals are most definitely not in-line with this Principle before it is rewritten, let alone with the proposed. Amendment.

Principle 5: Not Modifying Previous NPRs (Noise Preferential Routes). The airspace change proposal should not modify DSA's previous NPRs unless required for safety or airspace integration purposes.

Disagree. As written this Principle seems to be solely driven by avoiding the need to undertake a CAP 1616 Environmental Assessment. As such it is completely at odds with Design Principles 2 and 3 as written. It should therefore be deleted.

These Design Principles pay insufficient regard to those stakeholders that cannot or do not wish to enter CAS. We therefore propose the following additional Design Principles:

"Principle 6: All airspace proposed as part of this ACP must be of the minimum size and lowest classification needed to achieve its aims."

"Principle 7: Any airspace structure(s) proposed as part of this ACP must minimise disruption and maximise accessibility for all airspace users both inside the proposed airspace and around it."

For background on hang gliding and paragliding operations, particularly in relation to electronic conspicuity and controlled airspace interaction, we draw your attention to the following BHPA position paper:

https://www.bhpa.co.uk/documents/index.php?doc=BHPA_EC_Position.pdf

The BHPA remains willing to engage constructively with this proposal, but only through a process that provides a reasonable and proportionate opportunity for representative bodies and volunteer organisations to participate meaningfully.

Your ACP has been forwarded to local BHPA hang gliding and paragliding clubs that may be affected, and some may choose to contact you directly. However, these clubs operate on a volunteer basis and responses may not be immediate. The absence of responses from clubs at this stage must not be taken as evidence that the proposal — or any subsequent iteration of it — will not adversely affect their operations.

Kind regards

[REDACTED]

[REDACTED]

BHPA Senior Technical Officer

[REDACTED]

Web: www.bhpa.co.uk

British Hang Gliding and Paragliding Association (BHPA)

8 Merus Court, Meridian Business Park, Leicester, LE19 1RJ, England

Tel: 0116 289 4316

Fax: 0116 281 4949

British Hang Gliding and Paragliding Association Limited.

A company limited by guarantee and registered in England no 2618166

Registered office: 340 Melton Road, Leicester, LE4 7SL

From: [REDACTED]
Sent: 15 January 2026 11:38
To: Doncaster Sheffield Airport <DSA@doncaster.gov.uk>
Cc: [REDACTED]
Subject: DSA Airspace ACP 2024-039 Feedback - Objection

Dear DSA ACP sponsor.

I am writing to you to confirm our interest in the ACP proposal as DSA airspace directly affects the operations of Burn Gliding Club Ltd.

We have not been contacted directly and asked to contribute to the ACP Stage 1 and 2 consultation. When the original class D airspace was granted we were consulted and formal Letters of Agreement put in place to lessen the impact of DSA's airspace on our operations.

Burn Gliding Club Ltd had a Burn Box agreement to allow local soaring in the area north of the M62 motorway up to 4500ft amsl.

Burn Gliding Club Ltd also benefitted from the BGA LOA that provided 3 pre-defined areas we could also open and use as Class G airspace including The Upton Corridor, The Goole Box and The Darlton Box.

Whilst we firmly believe that the original DSA airspace was oversized / over complicated and was never subjected to close scrutiny via the PIR (post implementation review) that should have taken place, if it were to be reinstated "as it was" then as an absolute minimum, all the LoA's with local airspace users and the BGA should also be reinstated.

Please take this email as an objection to the reinstatement of the old airspace and add us to the list of local airspace users to be included in future stages of the consultation process.

Please confirm you have received this response on behalf of Burn Gliding Club and that we will be consulted on all future stages.

Meanwhile, can I suggest that your new air traffic controllers engage with both the RAUWG (Regional Airspace Users Working Group) meetings held at RAF Leeming and the LAIT (Local Airspace Infringement Team) meetings - previous chaired by DSA but now chaired by Leeds Bradford ATC.

Kind Regards

[REDACTED]
Burn Gliding Club Ltd
[REDACTED]

FW: DSA Airspace ACP 2024-039 Feedback - Objection

From Doncaster Sheffield Airport <DSA@doncaster.gov.uk>

Date Thu 15/01/2026 14:37

To [REDACTED]

Cc Doncaster Sheffield Airport <DSA@doncaster.gov.uk>

From: [REDACTED]

Sent: 15 January 2026 12:09

To: Doncaster Sheffield Airport <DSA@doncaster.gov.uk>

Subject: Re: DSA Airspace ACP 2024-039 Feedback - Objection

Oh, before I forget... The next LAIT meeting chaired by LBA is scheduled for next Tuesday 20th January 2026.

It's worth pointing out that the presence of DSA class D seemed to exasperbate the number of low level over flights at Burn - putting light aircraft in direct conflict with gliders being launched by winch cables and gliders undertaking local soaring and in the circuit pattern.

It's possible that GA pilots were concentrating on talking to DSA ATC and / or busy heads down changing radio frequencies - whilst approaching or leaving DSA airspace and then blundering straight over the top of Burn.

Attempts were made to get DSA ATC's ATIS service to include a warning about gliding activity around Burn if we were active and the Burn Box hadn't been opened for some reason. However, for this to be a future possibility it would need to be written into future agreed procedures.

Kind regards,

[REDACTED] - Airspace Representative

Burn Gliding Club Ltd

[REDACTED]

From: [REDACTED]
Sent: 07 January 2026 09:44
To: Doncaster Sheffield Airport <DSA@doncaster.gov.uk>
Subject: DSA ACP

DEA Aviation has operated from Gamston for a number of years and prior to closure was an active user of DSA.
We used DSA for instrument training, an active weather diversion, access to controlled airspace and a facility to assist in safe arrivals at Gamston in poor weather conditions.
The previous airspace provided protection for our operation and all those that operate to/from Gamston.
We fully support its reinstatement in full.
We would also like to engage with the operator about access to facilities in due course.

Kind regards,

[REDACTED]

Acting Head of Flight Operations DEA & ESAO

[REDACTED]



www.dea.aero [REDACTED]

[REDACTED]
Retford (Gamston) Airport, Retford, Notts, DN22 0QL

From: [REDACTED]
Sent: 12 January 2026 16:21
To: Doncaster Sheffield Airport <DSA@doncaster.gov.uk>
Subject: DSA ACP Feedback

Good Afternoon,

Gamston Flying School supports the reintroduction of controlled airspace and the associated procedures as were previously published.

The only comments that have been highlighted are with regards the CLASS E portion and associated RMZ/TMZ, would it not be clearer and simpler to simply make this Class D.

Would a staged re-introduction be implemented, ATZ first then work up towards CAS for "airlines"?

We would welcome further engagement and updates on the progress of this ACP as it progresses please.

Kind Regards,

[REDACTED]
Head of Training

Gamston Flying School | Retford Gamston Airport, Retford, Nottinghamshire, DN22 0QL
[REDACTED]

From: [REDACTED]
Sent: 14 January 2026 22:11
To: Doncaster Sheffield Airport <DSA@doncaster.gov.uk>
Subject: Derbyshire Soaring Club response to City of Doncaster Council ACP-2024-039 Stage 1 & 2 Engagement

Dear ACP sponsor,

Please find attached stakeholder feedback from the Derbyshire Soaring Club, a BHPA affiliated sport aviation club of 500 members who fly hang gliders and paragliders from our sites in the Peak District National Park and surrounding areas.

Please do not hesitate to contact me in the event you require any further information.

With kind regards,

[REDACTED] (Derbyshire Soaring Club Airspace Officer)

Derbyshire Soaring Club (DSC) response to City of Doncaster Council (CDC) ACP-2024-039 Stage 1 & 2 Engagement

Introduction

Derbyshire Soaring Club (DSC) is a club of around 500 Paraglider and Hang glider pilots, flying from hill sites in and around the Peak District National Park. We are an affiliated club of the British Hang gliding and Paragliding association (BHPA), and one of the largest and most active free-flying clubs in the UK. Our aircraft are unpowered ultralight soaring aircraft with relatively low performance. We fly VMC and are neither air-band radio nor transponder equipped, although some pilots do carry electronic conspicuity (EC) devices, so our activities are limited to Class G airspace below cloudbase in daylight hours.

Our members fly throughout the year, but during the thermal season (March to September), they can, in suitable weather conditions make soaring cross-country flights taking them far from their starting point. With the prevailing wind direction in the UK, this often means flights in the direction of, and beyond the immediate area of the former Doncaster Sheffield Airport.

Some additional information on equipment, flight types and patterns etc can be found in the BHPA position statement on Electronic Conspicuity, here:

https://www.bhpa.co.uk/documents/index.php?doc=BHPA_EC_Position.pdf

A number of other BHPA clubs in the surrounding area also have members who make unpowered cross-country flights through the involved area of class G airspace. These include the Peak Soaring Association, who operate from sites in a similar area to the DSC, the Sir George Cayley Sailwings club, operating from sites in East Yorkshire, The Dales Hang gliding and Paragliding Club, who operated from sites across the Yorkshire Dales area, the North Yorks Sailwing club, operating from sites in the North Yorkshire Moors, and Rutland Airsports, who conduct tow operations from a base near Rutland water.

General Comments on the Stage 1 & 2 consultation and Initial Design Option

The re-awakening of a previously dormant ACP by the issue of a stage 1 & 2 request for response document to stakeholders proposed a four week consultation period (including the Christmas and New Year period) for stakeholder feedback. It is the DSC's view that expecting responses in the requested timescale for a merged stage 1 & 2 process does not provide a reasonable or appropriate period for stakeholders to analyse and feed back in the necessary detail.

Irrespective, the document contains a proposed Initial Design which is a wholesale re-instatement of the previous, circa 2007, controlled airspace design. We find the sponsor's repeated use of terms like "re-instatement" or "restoration" to be misleading. Since the airport's closure in 2022 and the formal removal of its protected status, our members have safely used this area as Class G uncontrolled airspace. By treating a 17-year-old defunct design as a "starting point," the sponsor is attempting to bypass its responsibility to look at what is actually needed today.

A fair process must start with the current reality—the Class G baseline—and only add the absolute minimum of restrictions required for the low traffic volumes projected. Under the current CAP1616 regulatory framework, it is doubtful if a starting point of simple re-instatement is in line with the requirement to explore a range of options in comparison to a current situation baseline.

The CAA conducted a comprehensive post-implementation review (PIR) on this original airspace grant, published in 2017, which concluded that the design was "not as efficient or flexible as it might have been". If the design was considered far from optimum by the CAA in 2017, it is even less likely to be a reasonable fit with the Airspace Modernisation Strategy in 2026. Historical traffic and current forecasts—which predict only reaching 2022 levels by 2032—do not provide a reasonable justification for the massive volume of airspace proposed. The proposal also almost entirely ignores modern design for PBN (Performance-Based Navigation) and fails to address requirements for design based on current environmental and interoperability best practices.

The Failure of the Legacy "Patchwork" Approach (LOAs)

Before addressing the specific design principles, the DSC wishes to highlight that the 2008 design had significant practical workability issues for sport aviation. To manage the "oversized" nature of that airspace, the previous operators had to operate procedures from around 20 discrete Letters of Agreement (LOAs) with various stakeholders to provide even basic access.

The DSC (via the BHPA) held two such agreements, but they were a constant source of frustration and, more importantly, a safety concern. While outright refusals to activate the airspace access were infrequent, our members did frequently experience **incorrect activation and de-activation procedures** from the ATC side. These errors often stemmed from high controller workload, staff turnover, and the sheer complexity of managing dozens of dissimilar, manual LOA processes.

This created a dangerous environment of "airspace uncertainty," where pilots could not be entirely sure of the status of a block of sky. We do not want to return to a "broken" system that relies wholesale on such fragile administrative fixes. A modern design should target minimalism, accessibility and interoperability rather than relying on a complex web of manual process that has already been proven to fail in practice.

Specific Principles & Options Alignment Feedback

Understanding the Merged Stages 1 & 2 Approach

The Derbyshire Soaring Club (DSC) understands that the sponsor is conducting Stage 1 (Design Principles) and Stage 2 (Options Development) concurrently under the CAP1616 framework. On this basis, the following feedback addresses both the validity of the proposed principles and the alignment of the sponsor's primary design option—the "wholesale re-instatement" of legacy airspace—with those principles.

Principle 1: Safety. The airspace change proposal must maintain a high standard of safety and should seek to enhance current levels of safety.

- **Agreement with Principle: Agree.** Maintaining and seeking to enhance safety is a fundamental requirement.
- **Alignment of Option: Strongly Non-Aligned.**

Safety is not enhanced by simply reinstating legacy boundaries. In fact, large over-provisioned blocks of Class D create a "funneling" effect (as noted in the 2017 PIR), where non-equipped sport aviation is forced into narrow corridors of Class G. This increases mid-air collision risks for GA, sport, and military aviation when passing through "choke points" such as the **Pontefract gap**, or the narrow corridors around the **Retford/Gamston** and **Netherthorpe ATZs** which border the original airspace perimeter.

By re-imposing these oversized boundaries, the sponsor is choosing to concentrate diverse traffic types into small, congested volumes of sky while leaving the proposed Class D largely empty for the vast majority of the time. A better balance of safety should be achieved by utilising modern, precise PBN procedures that allow for smaller volumes of Controlled Airspace (CAS). This would reduce the funneling of non-equipped traffic into these dangerous bottlenecks and allow for a safer, more natural distribution of traffic across the region.

Principle 2: Legislation & Airspace Modernisation Strategy (AMS). The airspace change proposal should not be inconsistent with relevant legislation, the CAA's airspace modernisation strategy or Secretary of State and CAA's policy and guidance.

- **Agreement with Principle: Agree.**

Proposals must be consistent with legislation and the CAA's modernization strategy.

- **Alignment of Option: Strongly Non-Aligned.**

Re-instating a 17-year-old design disregards nearly two decades of progress. Modern policy requires a design built from the ground up to be as small as possible, using the current Class G reality as the baseline. Simply re-imposing a design the CAA already identified as "largely empty" and over-provisioned in 2017 is completely contrary to many principles laid out in the AMS. We do not believe it is consistent with modern policy to re-impose a "broken" legacy design just because it is easier for the sponsor to copy and paste old charts than to consult to design a modern, efficient structure that respects other airspace users

and achieves interoperability through better design rather than mandatory equipment. To meet the Airspace Modernisation Strategy (AMS), any new request for controlled airspace must be built from the ground up to be as small and integrated as possible.

Principle 3: Environmental Objectives. The airspace change proposal should deliver the Government's key environmental objectives with respect to air navigation as set out in the Government's Air Navigation Guidance 2017.

- **Agreement with Principle: Agree.**

Delivering key environmental objectives, such as noise efficiency and CO2 reduction, is vital.

- **Alignment of Option: Non-Aligned.**

The intent to "re-instate" legacy tracks ignores the missed opportunities of the 2019 PBN/RNAV update at DSA, which merely replicated old ground-based tracks. This locks in inefficient "staircase" descent profiles. An aligned, "clean-sheet" design would use PBN to enable Continuous Descent Operations (CDO), reducing the environmental footprint and the required volume of controlled airspace.

Proposing to re-impose a design that was already criticized in 2017—and only superficially patched in 2019—is a rejection of the Government's environmental objectives.

Principle 4: Impact on Other Stakeholders. The airspace change proposal should consider the impacts on air navigation service providers and other aviation stakeholders such as nearby airport operators.

- **Agreement with Principle: Agree.**

The impacts on all aviation stakeholders must be considered.

- **Alignment of Option: Strongly Non-Aligned.**

This option knowingly re-introduces proven hazards and restrictions. The 2017 PIR noted that this layout increased workload for neighboring airports and significantly limited the activities of sport aviation pilots. Presenting a design that encourages GA

and military pilots and forces non-equipped pilots into dangerous choke points is a direct negative impact on stakeholder safety.

Principle 5: Not Modifying Previous NPRs (Noise Preferential Routes). The airspace change proposal should not modify DSA's previous NPRs unless required for safety or airspace integration purposes.

- **Agreement with Principle: Strongly Disagree.**

This is a "design shortcut" that is inappropriate under modern strategy.

- **Alignment of Option: Aligned (although disagree).**

While the option aligns with this specific principle, it only does so because the principle was engineered to protect a legacy design shortcut. By refusing to modify outdated NPRs, the sponsor is artificially keeping airspace boundaries larger than necessary to ensure "containment". This principle should be removed or re-worked to allow for a PBN-driven design that minimizes, rather than replicates, the legacy footprint.

Suggestions in light of the above comments on proposed design principles

The principles as proposed seem to be engineered solely to allow stages 1 & 2 of the ACP to be used in an attempt to reverse the Secretary of State's decision not to call in the dis-establishment of the DSA airspace. This approach appears to bypass a proper airspace change design process with stakeholders, one that should be driven by a realistic statement of need and conducted in accordance with the current regulatory framework, policy guidance, and typical modern operational patterns..

In addition to addressing the concerns above, the DSC feels that further design principles should be adopted which help to align the initiation of any new airspace design more clearly with the regulatory framework and the needs of all stakeholders.

Additional Principle 6. Proportionality. Airspace dimensions must be proportionate to actual realistic traffic levels forecast for the first 5 years of operation, not any theoretical capacity or outdated 2008 forecasts.

From: [REDACTED]
Sent: 12 January 2026 11:39
To: Doncaster Sheffield Airport <DSA@doncaster.gov.uk>
Subject: Re: REQUEST FOR FEEDBACK - Doncaster Sheffield Airport Airspace Change Proposal

Dear Doncaster Sheffield Airport Airspace Change Proposer,

We would like to stress that the 'start point' is no CAS. Until such time as traffic numbers and density justify the implementation of CAS, then there is no case.

There are many aerodromes that operate public transport flights without the benefit of Controlled Airspace already.

This requirement should be added to the Design Principles

Regards

[REDACTED]
**Chief Executive Officer
Light Aircraft Association**

[REDACTED]
www.laa.uk.com

From [REDACTED]
Sent: 14 January 2026 23:55
To: Doncaster Sheffield Airport <DSA@doncaster.gov.uk>
Subject: Airspace Change Proposal 2024-039

Happy new year

As the head of training representing Yorkshire Aero Club, we agree with the design principals and don't see at this time any modifications that need to be made to this. It appears to be the restating of the pre-existing DSA airspace which worked well before as far as we are concerned.

A potential change and issue maybe the Sandtoft Airfield ATZ which is a busy GA airfield seeing a lot of movements including flight training. During the DSA days the Sandtoft ATZ was in place and recognised by DSA, offering an airspace zone for GA aircraft manoeuvring/training in the Sandtoft area, without requiring a clearance from Doncaster ATC. This stretched to 2000 feet and 4nm diameter.

Recently the airfield has been declared unlicensed which means the ATZ has effectively disappeared. This is not a problem at present for users, but may cause complications when the airspace is reinstated. How will the new airspace proposal allow for aircraft operating at Sandtoft?

[REDACTED]

Head of Training
Yorkshire Aero Club
www.YAC.uk

On Friday 23rd January 2026 [REDACTED] wrote:

Hi [REDACTED]

Thanks for your feedback on Doncaster Sheffield Airport's Stage 1 and 2 engagement. We're a consultancy supporting City of Doncaster Council on this Airspace Change Proposal.

We have a query regarding your email below. You say that the Sandtoft ATZ no longer exists as the aerodrome is now unlicensed. However, it's still in the AIP, even in the AIRAC 03/2026 edition.

EGCF AD 2.17 AIR TRAFFIC SERVICES AIRSPACE

Designation and lateral limits	Vertical Limits	Airspace Class	ATS unit callsign/ language	Transition Altitude	Hours of applicability	Remarks
1	2	3	4	5	6	7
SANDTOFT ATZ A circle, 2 NM radius, centred at 533335N 0005130W on longest notified runway (04/22)	Upper limit: 2013 FT ALT Lower limit: SFC	D G	SANDTOFT RADIO English	5000 FT		ATZ 2000 FT AAL.

Are you able to confirm when you expect the Sandtoft ATZ to be formally disestablished? When it goes, will you still have Air/Ground available?

Many thanks,

[REDACTED]

From: [REDACTED]
Sent: 13 January 2026 12:11
To: Doncaster Sheffield Airport <DSA@doncaster.gov.uk>; [REDACTED]
[REDACTED]
Subject: Re: REQUEST FOR FEEDBACK - Doncaster Sheffield Airport Airspace Change Proposal

Dear [REDACTED]

Thank you for sharing the engagement document and inviting feedback on Stages 1 and 2 of the CAP1616 process for Doncaster Sheffield Airport.

After reviewing the material, I can confirm the following:

Stage 1 – Design Principles

I agree with the proposed mandatory principles on safety, policy compliance, and environmental objectives.

- The discretionary principle regarding technical impacts on air navigation service providers and nearby airports is appropriate.
- Retaining the existing Noise Preferential Routes (NPRs) unless required for safety or integration purposes is sensible and supports continuity for local communities.

Stage 2 – Initial Design Option

Reinstating the previous controlled airspace structure and flight procedures appears to be the most practical and efficient starting point.

- At this stage, I have no objections to the proposed dimensions, classifications, or procedures. However, I recommend ensuring alignment with any forthcoming regional airspace modernization initiatives to minimize future changes.
- Please consider opportunities to enhance integration with general aviation and mitigate potential noise impacts where feasible.
- Here at Leeds East we have significantly increased our movements, especially IFR arrivals using our RNP approach. Going forward, from a safety concern, we would look to greater coordination from DSA with regard to deconfliction and entering controlled airspace.

I appreciate the comprehensive approach taken and look forward to further engagement as the proposal progresses.

Kind regards,

[REDACTED]
Airfield Safety Manager

From: [REDACTED]
Sent: 08 January 2026 17:05
To: Doncaster Sheffield Airport <DSA@doncaster.gov.uk>
Cc: [REDACTED]

Subject: RE: REQUEST FOR FEEDBACK - Doncaster Sheffield Airport Airspace Change Proposal

Good Afternoon

Please find attached a response to this consultation on behalf of the three Chambers of Commerce in South Yorkshire.

All the best

[REDACTED]

[REDACTED]
Chief Executive Officer

[REDACTED] **W:** doncaster-chamber.co.uk
A: Unit 1 Ten Pound Walk, Doncaster, DN4 5HX



The banner features the Doncaster Chamber logo (dc) and the text "Doncaster, What's Next? Your City. Your Say. Business to Council: Let's Talk Doncaster Sheffield Airport January 30th 2026". It is sponsored by Finance for Enterprise. Below the banner is a grid of logos for various patrons, including EXCEL, Automated Analytics, THE CROWN HOTEL BARTKY, CLARKS, Club Doncaster, Doncaster University Centre, ELLGIA, EQUANS, FlyDoncaster, Handelsbanken, Harrison College, HSR LAW Solicitors, HYBRID Air Vehicles, KINGSWOOD, ORB RECRUITMENT, Polypipe Building Products, Wabtec RAIL LIMITED, and Westfield Health.

City of Doncaster Council

DSA Airspace Change Proposal 2024-039

Submitted via: DSA@doncaster.gov.uk

January 2026

Dear Sir/Madam

Re: Doncaster Sheffield Airport – Airspace Change Proposal (ACP-2024-039)

We are writing jointly on behalf of Barnsley & Rotherham Chamber of Commerce, Doncaster Chamber of Commerce, and Sheffield Chamber of Commerce. Collectively, our organisations represent thousands of employers and tens of thousands of workers across all sectors in South Yorkshire.

Whilst not unanimous, support for the reopening of Doncaster Sheffield Airport (DSA) is significant within South Yorkshire's diverse business communities. Indeed, there is a majority view that a reopened and successful airport can be catalytic for South Yorkshire's economy. As such – and often in partnership with other business organisations – the three South Yorkshire Chambers have regularly and consistently articulated their support for DSA based on its likely positive impact on growth, job creation and infrastructure investment. Additionally, we believe that the reopened airport will play a catalytic role in the successful delivery of Mayor Coppard's South Yorkshire Growth Plan 2025-35 with positive implications for key future-facing sectors such as advanced manufacturing, clean energy and defence.

1. The economic imperative – reinstating airspace is essential to delivering c5,000 new jobs

Passenger airlines cannot operate from DSA until a safe and efficient airspace structure is in place. Without an expanding portfolio of passenger flights – alongside other operations – the economic benefits of the airport, including the creation of c5,000 direct jobs – cannot be realised. As such, the reinstatement of airspace is therefore of paramount importance to the economy and the delivery of Mayor Coppard's Growth Plan.

2. Supporting the “quickest safe route to reinstatement”

We welcome reinstatement of the tried-and-tested controlled airspace, NPRs and procedures that operated safely for more than 17 years. This represents a proven approach and will minimise uncertainty for prospective operators while maintaining compatibility with wider regional airspace modernisation. Reinstating the existing airspace at pace will also accelerate the economic benefits and avoid the need for further consultation which could delay the reopening of DSA. Avoiding further delay is of paramount importance as it creates the quickest route to profitability and therefore protects public investment into DSA.

3. Freight will be an essential component of South Yorkshire Airport City's success

Freight capability is critical and aligns strongly with the region’s manufacturing and export profile; it also facilitates the aspiration articulated within South Yorkshire’s Growth Plan to encourage more of the region’s SMEs to internationalise. We therefore endorse the reinstatement of any procedures that further attract freight aircraft to operate from DSA.

4. Minimal restrictions on flight timing – to support business and connectivity

We support the proposal of continued minimal restriction on flight timings, including early and late services. Business travellers and freight operators alike require predictable operations and need flights at the start and the end of the day to help them maximise valuable time. A failure to offer this will result in business travellers using other airports. Maintaining flexibility around flight timing will underpin the airport’s prospective commercial viability and, again, therefore safeguard public investment into the project.

5. Conclusion

We appreciate the clarity of the documentation and the invitation to provide feedback. While we are not best placed to offer technical aviation comments, we support the design principles relating to safety, policy conformity and environmental consideration. Given our primary focus on economic development, we would – collectively – reiterate:

- Our support for the reinstatement of DSA’s controlled airspace in line with the design principles proposed.
- Our desire to see the airspace reinstated at pace to accelerate the delivery of commercial and economic benefits alike.
- Our expectation that this process will enable DSA to reopen safely for freight in 2027 and passenger services in 2028.

DSA is South Yorkshire’s flagship economic regeneration project; its success is critical to our region’s growing reputation as a great place to do business. We thank the City of Doncaster Council for the opportunity to contribute to this consultation and stand ready to work with them, the South Yorkshire Mayoral Combined Authority, and other strategic partners to support the success of DSA going forward.

Yours faithfully,

██████████ – Barnsley & Rotherham Chamber of Commerce

██████████ – Doncaster Chamber of Commerce

██████████████████████ – Sheffield Chamber of Commerce

From: [REDACTED]
Sent: 08 January 2026 10:12
To: Doncaster Sheffield Airport <DSA@doncaster.gov.uk>
Subject: RE: REQUEST FOR FEEDBACK - Doncaster Sheffield Airport Airspace Change Proposal

Bassetlaw District Council welcomes the opportunity to provide feedback on the Doncaster Sheffield Airport Airspace Change Proposal (ACP 2024-039) as part of the CAP1616 Stage 1 and Stage 2 engagement process.

We recognise the strategic importance of reinstating controlled airspace to enable the reopening of Doncaster Sheffield Airport which we fully support.

Feedback on Proposed Design Principles (Stage 1)

We have reviewed the proposed design principles and provide the following comments:

- **Safety:** We agree that maintaining and enhancing safety should be the primary objective.
- **Policy Compliance:** We support alignment with CAA policy and the Airspace Modernisation Strategy.
- **Environmental Objectives:** We endorse the inclusion of Government environmental objectives and request clarity on how noise and emissions will be monitored and mitigated.
- **Technical Principle:** We agree that impacts on other aviation stakeholders should be considered, particularly integration with nearby airports and general aviation activity.
- **Noise Preferential Routes (NPRs):** We support retaining existing NPRs unless changes are essential for safety or integration.

We do however wish to raise the following additional suggestions for consideration that we feel would further strengthen the proposal:

- Consider adding a principle on community impact and engagement, ensuring transparency and mitigation of local concerns regarding noise and air quality.
- Include a principle on future-proofing to accommodate National Air Traffic Service regional airspace changes anticipated from 2030 onwards.

Feedback on Initial Design Option (Stage 2)

We note the proposal to reinstate the previous controlled airspace structure and associated procedures. Our comments are:

- **General Support:** We agree that reinstating the former structure is a practical starting point, given its proven safety record.
- **Noise Management:** We request confirmation that the Night Noise Quota System will be robust and enforceable, and that NPR compliance will be monitored effectively.
- **Airspace Boundaries:** Please consider whether minor adjustments to controlled airspace boundaries and associated flight paths could reduce impacts on local communities by avoiding unnecessary overflight of more densely populated or noise-sensitive areas within Bassetlaw.
- **Environmental Assessment:** We would welcome further detail on how environmental impacts (noise, emissions) will be assessed and mitigated during the appraisal stage.

Other Considerations

Whilst we fully support the reopening of DSA and foresee the economic and social benefits it will bring to our district and the wider region, we urge you to ensure that engagement with local communities in Bassetlaw is prioritised during the full public consultation stage. Clear

communication on anticipated flight paths and noise contours will help manage expectations and address concerns early.

In summary, Bassetlaw District Council supports the principle of reinstating controlled airspace for DSA and we look forward to continued engagement as the ACP progresses. Please keep us informed of any refinements to the design principles or initial design options following this engagement.

I trust this is of assistance.



Chief Executive

FW: REQUEST FOR FEEDBACK - Doncaster Sheffield Airport Airspace Change Proposal

From Doncaster Sheffield Airport <DSA@doncaster.gov.uk>

Date Tue 13/01/2026 11:51

To [REDACTED]

Cc Doncaster Sheffield Airport <DSA@doncaster.gov.uk>

From: [REDACTED]

Sent: 11 January 2026 10:50

To: Doncaster Sheffield Airport <DSA@doncaster.gov.uk>

Subject: RE: REQUEST FOR FEEDBACK - Doncaster Sheffield Airport Airspace Change Proposal

Thank you for the information regarding the airspace change proposal relating to Doncaster Sheffield Airport.

We operate Headon Airfield which is below CTA 13 class E airspace. As this airspace base is at FL85 it is unlikely to affect our operations at Headon.

I agree with the proposed design principals you have set out in stage 1.

We have no further suggestions to the airspace design that could affect us in any way.

Thank you for the information you have submitted for us to consider.

Regards

[REDACTED]



FW: REQUEST FOR FEEDBACK - Doncaster Sheffield Airport Airspace Change Proposal

From: [REDACTED]
Sent: 12 January 2026 16:48
To: Doncaster Sheffield Airport <DSA@doncaster.gov.uk>
Subject: RE: REQUEST FOR FEEDBACK - Doncaster Sheffield Airport Airspace Change Proposal

Good afternoon [REDACTED]

Thank you for your email. Having consulted with internal colleagues, I can confirm that we have no comments to make in response to the two consultation questions below.

For any future consultations regarding the potential reopening of Doncaster Sheffield Airport, please

[REDACTED] and replacing it with the following: [REDACTED]. This will ensure the messages go directly to our Yorkshire Area Sustainable Places team, who deal with planning matters and the sustainable growth agenda.

Many thanks,

[REDACTED]
Engagement Specialist, Yorkshire Engagement and Correspondence team
[Environment Agency](#) | Lateral, 8 City Walk, Leeds, LS11 9AT

[REDACTED]
Please note I work part-time: my normal working hours are Monday – Friday, 9:15-15:45

From: [REDACTED]
Sent: 12 January 2026 11:50
To: Doncaster Sheffield Airport <DSA@doncaster.gov.uk>
Subject: RE: REQUEST FOR FEEDBACK - Doncaster Sheffield Airport Airspace Change Proposal

Hello [REDACTED]

Thank you for contacting us, we're pleased to hear you're making progress on this!

Reading through, our sentiment is that much has remained the same as previously which worked well for us. We agree with the proposed design principles as set out below and our only suggestion would be that you continue to engage closely with us as you progress and that we work to re-establish the standing agreement. I forward your email below onto our various tenants and asked them to submit comment if they see fit, I trust if they felt the need too, they have.

Kind regards,
[REDACTED]



[Redacted]

DSA@doncaster.gov.uk

[Redacted]
Lincolnshire County Council
County Offices, Newland
Lincoln, LN1 1YL

14.01.2026

Dear [Redacted]

RE: Doncaster Sheffield Airport Airspace Change Proposal – Request for Feedback

Thank you for consulting with Lincolnshire County Council in respect of the Stage 1 and Stage 2 engagement proposals for the reopening of Doncaster Sheffield Airport.

Having read the consultation document provided, we have no specific comments to make in relation to either the Stage 1 or Stage 2 Engagement questions. The approach being taken is supported.

We would also like to take this opportunity to express our support for the recommencement of use of the site for both passenger and cargo flights, and the benefits that this will bring to both the South Yorkshire Airport City area, and those wider areas such as Lincolnshire. This project and its benefits will be alongside other significant projects, including STEP and the wider energy supercluster along the Trent Valley, and their benefits that will be positive to the economy of the wider area, including Lincolnshire.

We look forward to working closely with you in the future and receiving notification of the full public consultation at Stage 3.

Kind Regards,

[Redacted Signature]

[Redacted Name]

Executive Director of Place

FW: REQUEST FOR FEEDBACK - Doncaster Sheffield Airport Airspace Change Proposal

From: Doncaster Sheffield Airport <DSA@doncaster.gov.uk>
Date: Tue 13/01/2026 16:55
To: [REDACTED]
Cc: Doncaster Sheffield Airport <DSA@doncaster.gov.uk>

From: [REDACTED]
Sent: 13 January 2026 16:12
To: Doncaster Sheffield Airport <DSA@doncaster.gov.uk>
Cc: Historic England Yorkshire [REDACTED]
Subject: RE: REQUEST FOR FEEDBACK - Doncaster Sheffield Airport Airspace Change Proposal

Dear [REDACTED]

Thank you for your email.

Historic England has no comments to make.

Thanks

[REDACTED]

[REDACTED] | [REDACTED]
Regions: North East & Yorkshire

Please note I am currently hybrid working.

Historic England | Bessie Surtees House
41-44 Sandhill | Newcastle upon Tyne | NE1 3JF
[REDACTED]

www.HistoricEngland.org.uk



From: [REDACTED]
Sent: 12 January 2026 15:32
To: Doncaster Sheffield Airport <DSA@doncaster.gov.uk>
Subject: Doncaster Sheffield Airport Airspace Change Proposal Natural England Response

Good Afternoon,

Please find attached Natural England's response to Doncaster Sheffield Airport Airspace Change Proposal.

Kind regards,

[REDACTED]
Coastal Higher Officer
Sustainable Development Team
Yorkshire & North Lincs

Natural England
Lateral
8 City Walk, Leeds LS11 9AT

[REDACTED]
www.gov.uk/natural-england

Follow us on Twitter [@NEYorksNLincs](https://twitter.com/NEYorksNLincs)



Date: 12 January 2026
Our ref: [REDACTED]
Your ref: Doncaster Sheffield Airport Airspace Change Proposal



[REDACTED]
Programme Director
SY Airport City
Corporate Resources
City of Doncaster Council

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY

Dear [REDACTED],

Development Proposal: Doncaster Sheffield Airport Airspace Change Proposal 2024-039

Thank you for your consultation on the above dated 03 December 2025.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

The following advice is based upon the information provided within the DSA ACP Stage 1-2 Engagement Document. We have no specific comments to make on the feedback questions as they do not relate to Natural England's remit, but we wish to highlight the following.

THE CONSERVATION OF HABITATS AND SPECIES REGULATIONS 2017 (AS AMENDED)

Internationally Designated Sites

Natural England notes that the application site is in close proximity to a European designated site (also commonly referred to as Natura 2000 sites), and therefore has the potential to affect its interest features. European sites are afforded protection under the Conservation of Habitats and Species Regulations 2017, as amended (the 'Habitats Regulations').

The application site is in close proximity to Thorne and Hatfield Moors Special Protection Area (SPA) and Hatfield Moors Special Area of Conservation (SAC). These sites are also notified at a national level as Hatfield Moors Site of Special Scientific Interest (SSSI). Please see the subsequent sections of this letter for our advice relating to the SSSI.

It is Natural England's advice that the proposal is not directly connected with or necessary for the management of the European site. We therefore advise that a Habitats Regulations Assessment should be provided to determine whether the proposal is likely to have a significant effect on any European site, proceeding to the Appropriate Assessment stage where significant effects cannot be ruled out.

We advise that the following impact pathways should be considered in the assessment:

- Potential noise and visual disturbance to SPA birds using Thorne and Hatfield Moors SPA.
- Potential air quality impacts associated with the proposals to Thorne and Hatfield Moors SPA and Hatfield Moors SAC

WILDLIFE AND COUNTRYSIDE ACT 1981 (AS AMENDED)

Sites of Special Scientific Interest (SSSI)

Natural England notes that the proposed development site triggers Impact Risk Zones (IRZ) for multiple SSSIs, including: Misson Training Area SSSI, Hatfield Moors SSSI, Potteric Carr SSSI, Misson Line Bank SSSI and River Idle Washlands SSSI. Based on the plans submitted, Natural England considers that the proposed development could have potential significant effects on the interest features for which these SSSIs have been notified. We advise that an assessment should be made of potential impacts on these sites from the proposals, including potential noise and visual disturbance and potential air quality impacts.

Should the developer wish to explore options for avoiding or mitigating effects on the natural environment with Natural England, we recommend that they consider using our Discretionary Advice Service.

Yours sincerely


Yorkshire and Northern Lincolnshire Area Team
Natural England

From: [REDACTED]
Sent: 13 January 2026 15:26
To: Doncaster Sheffield Airport <DSA@doncaster.gov.uk>
Cc: [REDACTED]
Subject: Yorkshire Wildlife Consultation Response

Good afternoon,

Thank you for consulting Yorkshire Wildlife Trust. Please find our consultation response attached. We hope you find our comments useful.

Kind regards,

[REDACTED]
Planning Specialist
Yorkshire Wildlife Trust

[REDACTED]



DATE: 13.01.26

BY EMAIL ONLY: DSA@doncaster.gov.uk

Ref: [Doncaster Sheffield Airport Airspace Change Proposal 2024-39](#)

Thank you for consulting Yorkshire Wildlife Trust (YWT) on this consultation for the reopening of Doncaster Sheffield Airport. Design Principle 3 is the only principle within the consultation documentation that explicitly relates to ecological factors. As the consultation references the Government's *Air Navigation Guidance 2017* (hereafter referred to as the ANG), we have reviewed the sections of this guidance document relevant to this consultation and referenced throughout our comments below.

Overall, YWT do not have any overriding objections to the re-opening of Doncaster Sheffield Airport, particularly as much of the built infrastructure already exists. Our primary concern relates to how the site will be managed moving forward and ensuring that opportunities to enhance biodiversity are taken wherever possible, including mitigating against the negative impacts the airport will have due to increased noise, light and air pollution. We must also point out that there have already been initial discussions with developers and the local authority regarding YWT acting as a potential partner to help increase biodiversity value across the landholding. Exploring partnership solutions could therefore be a constructive way forward; we would welcome further engagement regarding any potential to further this.

The ANG states that it:

"emphasises that the environmental impacts of aviation must be mitigated as far as is practicable and realistic to do so."

(Pg. 7, Air Navigation Guidance 2017)

At this early stage of consultation, there are currently no mitigation proposals presented to comment on. Given the location of the airport, its proximity to numerous Local Wildlife Sites (LWSs), and proximity to Yorkshire Wildlife Trust (YWT) reserve buffer zones, we expect ecological mitigation to be considered and discussed from the earliest opportunity. We would also have expected this consultation brochure to make reference to future environmental commitments, such as a commitment to delivering Biodiversity Net Gain (BNG), albeit formative at this stage.

We agree with the definition of sustainable development set out on page 8 of the ANG, which recognises that sustainable development has both environmental and economic dimensions, including enabling aviation to grow sustainably, to support the UK economy. YWT is supportive of





sustainable development in principle and understands the need for economic growth. However, in locations where there is a significant threat to the natural environment, we will raise any concerns that we have, to ensure that the best outcomes for nature are secured through the planning system. The ANG states:

“The Government’s policy is that airspace changes should seek to achieve the safest and most efficient use of airspace, taking into account the following constraints:

- Any limit on physical airport capacity.
- The number of flights permitted by planning decisions.
- Planning conditions such as noise preferential routes.
- Any limit on carbon emissions in planning conditions.”

(pg. 9, (Pg. 7, Air Navigation Guidance 2017)

In accordance with this guidance, any design decisions should be demonstrably informed by these constraints. We would welcome continued engagement regarding the ongoing development of the proposal in relation to these constraints, as the impacts of the above will all have effects on the local environment, should the Airport become operational again.

We would expect any future application to be supported by robust and up-to-date ecological reporting, taking full account of the proximity of Local Wildlife Sites and YWT reserve buffer zones; Betwixt Fen, Potteric Carr and Parsons Carr Reserves, support a range of bird species that could be adversely affected by increased aircraft noise. In addition, the wooded LWSs surrounding the airport are likely to support a variety of species, potentially increased since the airport’s closure in 2022. As ecological survey data is typically valid for a maximum three years¹, comprehensive baseline surveys reflecting current conditions would be essential.

We welcome that no runway extension is currently proposed, as this avoids further encroachment into surrounding countryside and nearby LWSs. However, concerns remain regarding the likely increase in noise, air pollution, light pollution, and general operational disturbance associated with the reopening of the airport. There are also specific ecological considerations related to the presence of birds on the airport grounds. The removal of nests, including nests of species such as curlew, has historically been one of the negative ecological impacts, pre-2022 when the airport was last operational. While these species may only occur due to existing management practices, clarity is sought on future policies, including whether alternatives such as egg removal for captive breeding and subsequent release elsewhere have been considered by the Applicant. Potential conflicts may also arise between airport operations and bird populations at nearby wetland sites, including

¹ CIEEM: Advice Note On The Lifespan Of Ecological Reports & Surveys, April 2019. Found at: [Advice-Note.pdf](#)





Classification: Public

Yorkshire Wildlife Trust

1 St. George's Place,
York, YO24 1GN

 01904 659570

 @YorksWildlife

 Yorkshire Wildlife Trust

 yorkshirewildlifetrust_

Yorkshire Wildlife Trust is a
company limited by guarantee.
Registered in England No. 409650
and is a registered charity No. 210807

Potteric Carr YWT Reserve, Parson's Carr, and other local wetlands as stated above, particularly in relation to bird strike risk. While this has not been a significant issue historically (pre-2022), clarification on future management and risk mitigation policies would be welcomed as well as a robust impact assessment.

The grassland habitats on and around the airport are also of ecological interest, particularly the acid grassland communities present. There may be opportunities to manage parts of the airport land more sympathetically for wildlife, especially land adjacent to Local Wildlife Sites. Current legislation means Biodiversity Net Gain (BNG) be required for this application, due to this, targeting these habitats through proposed mitigation strategies could provide meaningful ecological benefits; we would welcome further engagement regarding this as the project develops.

YWT's *Bringing Yorkshire's Nature Back, a Blueprint for Nature's Recovery*², published in 2025, builds upon international guidance and current government policy, outlining how YWT aim to achieve 30% of land in Yorkshire being positively managed for nature by 2030. Almost 200 nations, including the UK, have agreed to the legally binding international targets established in the Kunming-Montreal Global Biodiversity Framework³, aiming to effectively conserve and manage at least 30% of land, waters and seas by 2030. Our Blueprint shows that achieving 30% by 2030, will require a collaborative and cross sectoral effort; therefore, we are encouraging developers and businesses to consider how they can contribute to this aim. Ongoing discussions with the Applicant about how the Doncaster Sheffield Airport could contribute to achieving these goals would be welcomed and we would be keen to work with you to explore this.

We hope you have found these comments useful and reiterate that we would welcome continued engagement regarding the development of this proposal to explore potential partnering, to ensure that the best outcomes for nature can be achieved, whilst encouraging sustainable development.

Kind regards,

The Planning Team
Yorkshire Wildlife Trust

planning@ywt.org.uk

² [Our Blueprint for nature's recovery | Yorkshire Wildlife Trust](#)

³ [Kunming-Montreal Global Biodiversity Framework 2030 Targets \(with Guidance Notes\)](#)



From: [REDACTED]
Sent: 11 January 2026 11:02
To: Doncaster Sheffield Airport <DSA@doncaster.gov.uk>
Subject: Feedback on ACP

To whom it may concern,

Re
The Current Airspace Change Proposal for Doncaster Sheffield Airport

Stage 1 feedback

It appears to be based on the previous airspace that was needed with DSA version 1, up until the airport closed in Dec 2022.

Its design suited the airport and its location, enabling a safe and secure operation here in Doncaster.

As long as this proposal meets all requirements for current legislation and safety protocols

I have no issues

Stage 2 feedback

The airport may have been closed for over 3 years, but our campaign and the local authorities have worked tirelessly to reopen DSA.

It's always been on the cards that DSA would reopen and with that in mind I can think of no changes needed to the proposal.

Please take this email as full acceptance and approval for the ACP

[REDACTED] #saveDSA

**DONCASTER ACP-2024-039 STAGE 1 AND 2 ENGAGEMENT.
MINUTES OF CALL BETWEEN TRAX AND BGA DONCASTER**

Online 15th Jan 2026

Attendees

Present

██████████
██████████████████
██████████████
██████████████
██████████████
██████████████

Representing

BGA (Yorkshire Gliding Club / Regional Soaring Airspace Group)
BGA (Regional Soaring Airspace Group)
BGA (Derbyshire Soaring Club)
BGA (Dales Paragliding and Hang Gliding Club)
Trax ATM Consultancy representing the ACP
Trax ATM Consultancy representing the ACP

AGENDA

1. Introductions (Trax/BGA)
2. Short background on the proposal (Trax)
3. Overview of CAA and ICAO policies on Controlled Airspace (CAS) structures and applicable classifications (Trax)
4. Design principles and BGA's proposed additions (Trax/BGA)
5. Typical gliding activities in the DSA region and how the proposed DSA CAS would affect BGA members (BGA)
6. Explore potential amendments to the previous CAS construct to mitigate impacts (Trax/BGA)

AGENDA ITEMS 1 AND 2: INTRODUCTIONS AND SHORT BACKGROUND ON THE PROPOSAL

████ opened by stating that, in terms of our size and operations, Derbyshire Soaring Club are probably the most impacted gliding club by DSA's previous airspace. We were party to a number of Letters of Agreements (LoAs), negotiated for operation of the previous Controlled Airspace (CAS).

████ Provided an overview of the ACP. The airport closed in Nov 2022 triggering a suspension of the CAS. Following a lengthy process, CAA eventually de-notified the airspace in early 2025 and it was removed from the AIP in Sept 2025. During that time, City of Doncaster Council (CDC) acquired a lease for the site and then began a process of reopening the airport and CAA advised that CDC will need to go through a new ACP with the options and rationale justification for reinstating the controlled airspace that would support their operations. Fly Doncaster Limited is the organisation established and owned by CDC which will become the airport operator. The stated ACP timeline is very short in the context of other ACP timelines with the CAA supporting a fast-tracked process where possible. What is meant by 'fast-tracked' is not defined though the sentiment is that that the ACP would move through the process quicker than other proposals. Other than combining stages one and two of the process, we haven't really made any other suggestions to towards fast-tracking the process. Whilst CAA may afford priority to this ACP in terms of timescales, the ACP is adhering to V5 of CAP1616 and timelines for the next version of CAP1616 (on which CAA are currently consulting) are not defined.

████ asked if the fast-tracked process still required the full set of gateways and █████ confirmed this was the case.

████ clarified that whilst we have a combined Stage 1 and 2 gateway, there will still be 2 submissions which are both assessed chronologically by CAA and Stage 1 must be passed before Stage 2. I.e. we understand there still to be 2 CAA decisions. Therefore, there could be a scenario where CAA pass Stage 1 but not Stage 2. Whilst we have a combined gateway, CA have requested an 8-week assessment period therefore we haven't really gained any time so far.

████ asked if there was still the same level of consultation and engagement required throughout the process and █████ confirmed this.

████ asked why all Stage 1 and 2 engagement documents weren't on the CA airspace change portal. █████ advised that it is normal practise for all material to be uploaded to the portal following submission to the CAA.

████ asked who the Stage 1 and 2 engagement document had been shared with. █████ advised Stages 1 and 2 requires targeted engagement with local elected representatives, aviation bodies etc and so doesn't go to public level yet. The material was sent to, in the region of, 40-50 (*post meeting note: it went to 83 organisations*)

different stakeholder groups comprised of local authorities and councils, airlines, air traffic control units, local airports, local airspace users and environmental groups.

█ proposed that it should have gone directly to every organisation involved in the previous LoAs last time. █ advised that NATMAC is the overarching body that represent all aviation and the engagement document should have reached all organisation through the NATMAC representatives.

█ summarised Stages 1 and 2 of the process around creating design principles and then creating an option or options to address the design principles and statement of need.

AGENDA ITEM 3: UK CAA AND ICAO RULES/POLICIES ON CONTROLLED AIRSPACE

█ advised that whilst the airport and airlines want CAS, this will need to be justified to the CAA and we have received feedback from some stakeholders stating their opinion that there is no need/justification for CAS for Doncaster Sheffield Airport (DSA).

█ summarised the current regulatory landscape, quoting extracts from:

CAA Policy for the Design Controlled Airspace Structures
CAP 778 Policy and Guidance for the Design and Operation of Departure Procedures in UK Airspace
ICAO Annex 11
CAP1711 Airspace Modernisation Strategy 2023-1040
CAP2304: Applications for instrument approach procedures to aerodromes without Approach Control and/or with a non-instrument runway

In summary:

An ANSP needs to set out the case for CAS to ensure that they can provide its services in a safe, efficient, continuous and sustainable manner. This includes identifying if the airport needs Standard Instrument Departures (SIDs) and/or Instrument Approach Procedures (IAPs) and the rules for CAS vary between SIDs and IAPs.

Where CAS is justified, in the UK, sponsors must seek to ensure the amount of controlled airspace is the minimum required to maintain a high standard of safety and subject to an overriding national security or defence requirements that the needs of all airspace users is reflected on an equitable basis.

ICAO Annex 11 says the need for the provision of air traffic services shall be determined by considering the types of air traffic, the density of air traffic, meteorological conditions and any other factors.

Some stakeholders have said DSA can't justify CAS as they don't have enough forecast Air Traffic Movements (ATMs). However there is no threshold for a volume of ATMs, it is based on the mixture (e.g. numbers, types, speeds etc) of air traffic operating in the airspace. You could have an airport with a higher number of commercial ATMs in a part of the country with very low traffic density that can operate safely without CAS, compared to an airport with a lower number of ATMs operating in a busier piece of airspace that does warrant CAS protection.

The Air Navigation Order says that an Approach Control Service must be provided to aircraft making an instrument approach to a UK Aerodrome but the UK permits an Approach Control Services outside CAS and it also permits RNP Approaches outside CAS, without an Approach Control Service (no reference to Instrument Landing System (ILS)). DSA will propose to have IAPs, with an Approach Control Service but the UK does allow a Procedural Approach Control Service in Class G airspace. This isn't aligned to ICAO which says an Air Traffic Control Service needs to be provided in Controlled Airspace (with CTR/CTAs Classes B-D) and only Flight Information Services are offered outside CAS.

UK CAA policy is not currently aligned with ICAO on this, but CAP1711 says that the UK intentions are for their future air traffic service provision to be *"aligned with ICAO standards and recommended practises and procedures for air navigation and hence air traffic control service is provided only in controlled airspace"*. CAP1711 also envisages Class E CTAs, co-located with Transponder Mandatory Zones (TMZs) where Class D cannot be justified. CTRs must be Class D. DSA will also be proposing SIDs and CAA Policy says these should be wholly contained within CAS.

It is DSA who have to justify to the CAA whether they need CAS and we'd like this session to not be a debate on whether CAS is required but to focus on an assumption that there is CAS, and therefore to understand the

impacts on your operations if it was reinstated as before, how could we mitigate those impacts through changes to classifications or boundaries, what worked and didn't work last time. Do we need to do something different?

█ said that whilst he understood this meeting wasn't to justify the need for CAS, we do need to revisit the size, complexity and underutilisation of what was there before. █ said CAA had previously said it could have been 70% less in terms of size whilst still achieving the safety aims it needed to achieve. BGA want to start with just an ATZ or CTR and want to see different options explored with a much smaller volume of CAS and we also want to see 2 additional design principles.

AGENDA ITEM 4 DESIGN PRINCIPLES

The BGA had proposed 2 additional design principles:

1. "Any airspace structure(s) arising from the ACP should be of the minimum size and lowest classification needed to achieve its aims."

And

2. "2. Any airspace structure(s) arising from this ACP should minimise disruption and maximise accessibility for other airspace users both inside the proposed airspace and around it".

█ stated there was no problem including 1 though pointed out this was already covered under policy. █ stated they wanted it to be quoted in the design principles. █ agreed to such a design principle.

With 2, █ stated they could re-word DSA's proposed principle "The ACP should consider the impacts on air navigation, service providers and other aviation stakeholders, such as nearby airport operators" to address the BGA proposal. █ said to just have it as BGA had proposed but █ advised that CDC need to consider any other suggestions from other stakeholders however the changing of "nearby airport operators" to "all airspace users" feels sensible.

At this point █ wanted to clarify that the BGA are not necessarily opposed to call CAS, we recognise there is a need for commercial aviation and it must be safe and meet all the required standards. We're just saying it needs to be justifiable, proportionate and arrived at through due process. BGA's issue is that, as far as they are aware, there are no airlines signed up to the future DSA operation and the ACP is at a very early stage. Getting it right early in the process can save a lot of time for everyone in the long run. The Regional Soaring Airspace Group (RESAG) has in the region of 23,000 pilots and probably more movements than Heathrow. RESAG works in conjunction with the BGA and recommend good practise for how to tackle ACPs across the country. The BGA is the national representative organisation but the regional bodies feed into the BGA.

█ advised in this region, there are c.40,000 movements per year and these aren't solely made up of local users with some gliders coming to this region from all over the country. █ advised they hadn't had time to put together a full analysis of their members' movements in the region since the closure of Doncaster's CAS.

AGENDA ITEM 5: TYPICAL GLIDING ACTIVITIES IN THE DSA REGION AND HOW THE PROPOSED DSA CAS WOULD AFFECT BGA MEMBERS

and

AGENDA ITEM 6: EXPLORE POTENTIAL AMENDMENTS TO THE PREVIOUS CAS CONSTRUCT TO MITIGATE IMPACTS (Trax/BGA)

█ advised that many members are non-transponder, non-radio which excludes them from Class D airspace unless through LoAs though the LoAs often required radio carriage. With Doncaster last time, there were around 20 LoAs covering similar, but not identical pieces of airspace with procedures that were similar but not identical, with different organisations in terms of activation which created a confusing situation. This was difficult for ATC to manage and difficult for their pilots, sometimes with confusion over which LoAs were active on any given day. This is not something we are in favour of reproducing and it is not sensible to progress a pure re-instatement of the previous CAS. A redesign based on principles that will support a design for the current regulatory and operational framework with PBN at its core, would be more appropriate. Reinstatement could be shown as an option though I believe CAP 1616 actually mandates that that sponsors should provide more than one option to compare with the baseline. Mechanisms that are talked about nowadays for facilitating access to airspace in and around airports involves radio and transponder use, and that, unfortunately for us is

not always possible so quite a lot of the possible ways of increasing access to CAS don't really apply to us and therefore still creates airspace blocks that are in accessible. We don't want to end up with the same choke points that we had before and the same restrictions on our activities. We would really like to see a second option developed that is based on PBN on and on modern kind of approach rather than a 2007 airspace design.

█ then highlighted CAA's Post Implementation Review (PIR) of the 2008 CAS implementation, published in 2017, that made a number of recommendations and that the airspace was overprovisioned, the airspace was largely empty, the airport didn't reach its forecast growth and if the airspace was designed again (in 2017) it would not have looked like what was implemented in 2008. This suggests that a total reinstatement of the CAS is no proportionate. There is no firm requirement to surround everything with controlled airspace anymore.

█ confirmed there is no hard requirement for IAPs with be contained within CAS and there are many examples of airports in the UK with IAPs outside CAS.

█ said Humberside is a good example of a busy airport in Class G airspace and we'd like to options closer to this end of the scale. The PIR mentions a trigger of 1m passenger per year as a trigger for requiring CAS.

█ suggested SIDs that climbed to the east of the airport, inside the CTR, removing the need for the CAS to the west should be investigated. They may be windy/longer but could be suitable given the low levels of DSA traffic. Look at the art of the possible to remove the CTAs to the west.

█ commented there is an irony in that the BGA are highlighting how busy the airspace is but that in itself can support the need for CAS as the heavily used Class G airspace increases the risk for the commercial traffic.

█ counter-argued that the excessive volume of CAS last time, as being proposed, created significant choke points for low level GA activity including the area to the south around Netherthorpe and Retford Gamston ATZs and to the north-west in the Pontefract corridor that were detrimental to the rest of the aviation community.

█ requested to explore these issues in more detail so we can investigate ways to mitigate them.

█ began to articulate the issues with the previous CAS and Netherthorpe and Retford Gamston ATZs and how this displaced traffic to the south because even when the LoA enabled access up to 3500ft, this wasn't enough to glide-clear of the ATZ, it really needed 4000ft minimum. █ noted this was an issue more specific to hang gliding and para gliding than it would have been for powered aircraft and gliders. The more significant issue was to the west and the Pontefract gap.

█ interrupted, concerned that we shouldn't be trying to resolve issues that are already documented in the CAA PIR report and also that in the assessment meeting for this ACP, the CAA said we need to provide more than one option so CDC needs to come up with other options. █ agreed saying the previous airspace was not fit for purpose and CDC need to put forward a more realistic option.

█ advised that CAA did not tell CDC they needed more than one option. █ said that CAP1616 does say you must have more than one option. █ advised CAP1616 does allow a sponsor to only have a single option, with justification. █ said OK but this needs to be for design purposes, not political purposes.

█ said that this session is for us to understand the issues with the previous construct, so we can try and solve them with adjustments or even a new design, it's not to design airspace on the fly. We want to understand the pinch points and your operating areas in more detail so we stand the best chance of creating a proposal that best reduces the impact on other airspace users.

█ surmised that in simple terms, the previous CAS pushed all the traffic heading North/South out to the East/West. This created congestion to both sides of the airport but particularly to the west through the Pontefract gap (known as the UPTON corridor LoA) However, also to the east. █ queried why it created congestion to the East, given the FL105 base. █ explained that it's an area that's not conducive to good soaring flight which creates safety concerns. Whilst requests to transit CAS were always granted previously, even pilots who did have the required kit (radio/transponder) would avoid going into CAS because of the complexities of adhering to different levels whilst trying to keep radio contact. █ requested if BGA could provide data on traffic patterns and density around the area both with and without the previous DSA airspace to help inform the designers to propose mitigations.

█ enquired about whether Class E+ (Class E with RMZ/RMZ) could resolve the majority of issues, as pilots wouldn't have to worry about the CAS dimensions as much. █ explained that transponder carriage is a significant issue which was backed up by █, saying that there are a lot of cross-country pilots still that are not

transponder equipped. ■ asked whether an ADS-B transponder requirement could mitigate the issues but ■ explained even ADS-B a major issue for anybody flying paraglider. We don't have the aerials or the power transmission capability. If ADS-B was mandated it's going to cause a huge issue for our community.

■ advised that to provide the sort of data requested (by ■ then we need some time to put together that formally on paper and this would take some time as we would want to consult with all the clubs we represent plus other clubs not in the region who have long-range flights transiting the area.

■ said that the BGA could collate some information and asked ■ to make the request in writing to them but to also closely consult the CAA's 2018 PIR document as it contained lots of useful information. ■ said that the heatmaps in the PIR are good but they don't contain the vertical elements in there so if we could get digital data, for example from the Open Glider Network (OGN), this would be most helpful. ■ said that FLARM and other data, such as data logs, would also be useful.

■ requested that CDC create another, new design option that used modern PBN design techniques and modern aircraft performance that enable higher CAS bases. We would rather CDC came to us with another option, which we provide feedback on rather than the BGA to first provide data and opinion to inform a design. ■ said that we can do it that way, we're just trying to increase the chances of designing something more palatable for the BGA. ■ pointed out that whilst many people think that PBN results in less airspace and higher bases, that's not always the case. PBN doesn't mean aircraft climb higher, quicker and you still have CAA's CAS containment policy to meet and have to cater for all the different types of aircraft climbing at different rates. Yes, you can sometimes do curved approaches to a 3nm final but not all aircraft are able to fly those types of approaches, they're only flyable in certain weather conditions so airports often want ILS too and there's obstacles and terrain to consider. PBN is a tool but quite honestly, it doesn't solve everything.

■ said he'd still like to see a radically different design so we can engage meaningfully. ■ agreed and said the CAA would also want to see such an option. ■ said that CDC have followed the process correctly so far in that an option has been created and shared for feedback. Some of that feedback suggested no CAS is required and some has said to have another option. This round of engagement is not a formal consultation on the final preferred option.

■ said that broadly speaking, our flights rely on the power of the sun so anything that constrains us vertically or laterally limits our range increases complexity. Therefore, we'd like to see an option which has the minimum volume of CAS to safely operate because any airspace that requires a transponder and/or radio is shutting down airspace to half of the free-flight community. We don't want to have to go through every single issue here ■ agreed and said discussing the previous CAS construct is generating a lot of nugatory work and we need to see options based on modern design principles and modern capabilities and then we'll look at those.

■ enquired as to whilst CC designs another option in line with the suggestion today, can the BGA perform a data capture exercise in parallel? That way we can do some more informed design and you'll be armed with data to respond to a future consultation with.

■ said that they can start gathering the data but they'd like a written request but they would like to see a design that is the minimum required both in terms of volume complexity and classification.

■ said that to manage expectations, CDC's statement of need says that the objective is to reinstate the airspace as was there until it was removed in September of this year as quickly as possible. Our role is broader than that because we're applying the CAP 1616 process and engaging with lots of stakeholders for feedback on the single option that does that. There are two paths ahead, one is collaboratively with yourselves and others to try and understand the issues, to work through different options and to look for optimisation and discuss compromises, and the other is where there is obviously a conflict that goes to the regulator to determine. ■ responded saying they were aware of what the statement of need said and we also know the CAA said your first option is no CAS. ■ clarified that the CAA stated the baseline must be no CAS and we need to compare any option to that baseline scenario, not that no CAS is a viable option.

■ stated his opinion was that the sponsor was trying to reverse the failed call in from the Secretary of State for Transport to prevent disestablishment and they're trying to do that by presenting a single option, but that is not compliant with the CAP1616 process. We consider the single option presented is inappropriate and must be presented against a modern re-design, aligned with the additional 2 design principles we have proposed and against the forecast levels of CDC traffic. ■ added that it appears the ACP is trying be bullied through and it won't wash with the CAA.

█ said he appreciated our position between CDC and the BGA but a new option from a baseline of Class G was needed and we will be co-operative and supportive so long as it goes down that road.

█ said that his interpretation was that an accelerated CAP1616 process is vital to the success of the airport and if airspace isn't granted by CAA in a reasonable period of time it hinders the long-term viability of the airport. A shortcut stages 1 and 2 could result in a longer process overall if the CAA fail CDC at the first hurdle.

█ proposed the next steps which was for CDC to make a request to the BGA for some information to inform the design throughout the process (**Action 1**) and, in parallel, we will create another, new option (**Action 2**) in line with BGA's request for inclusion in the process.

█ agreed and requested Trax to let them know what information they would like but be aware such requests can take time as we're all volunteers. █ offered support to speed things up if we can. For example if you have raw data, we can convert it all to GIS format, you don't need to spend time generating graphics.

█ thanked all the attendees for their time and it is very much appreciated.

FW: REQUEST FOR FEEDBACK - Doncaster Sheffield Airport Airspace Change Proposal

From Doncaster Sheffield Airport <DSA@doncaster.gov.uk>

Date Thu 29/01/2026 09:19

To [REDACTED]

Cc Doncaster Sheffield Airport <DSA@doncaster.gov.uk>

📎 1 attachment (2 MB)

DSA ACP Stage 1_2 Engagement Document v1.0.pdf;

From: [REDACTED]

Sent: 28 January 2026 17:12

To: Doncaster Sheffield Airport <DSA@doncaster.gov.uk>

Subject: FW: REQUEST FOR FEEDBACK - Doncaster Sheffield Airport Airspace Change Proposal

Dear Doncaster Council,

Thank you engaging with Humberside Airport regarding ACP 2024-034.

From Humberside's perspective, the former airspace design and the associated coordination procedures between DSA, HUY, and PC East operated effectively and provided a sound framework for the safe management of air traffic in the area. Accordingly, Humberside Airport would be supportive of reinstating a Letter of Agreement that reflects the arrangements previously in place.

Subject to the establishment of such an agreement, Humberside has no additional feedback to offer on the current design proposal and remains available to participate in further discussion if required.

Kind Regards

[REDACTED] | Air Traffic Services Manager | Humberside International Airport
HUMBERSIDE AIRPORT | KIRMINGTON | NORTH LINCOLNSHIRE | DN39 6YH |

[REDACTED] | www.humbersideairport.com

