

# DONCASTER SHEFFIELD AIRPORT AIRSPACE CHANGE PROPOSAL

## ACP-2024-039



### Stage 2(A) Design Options & Design Principle Evaluation Submission Document

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7 May 2026

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1.0	5 March 2026	Original
2.0	7 May 2026	Updated following CAA feedback. (All changes in blue text)

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# 1. INTRODUCTION

## 1.1 Background

- 1.1.1 Doncaster Sheffield Airport (DSA) is located around 6 miles southeast of Doncaster and 19 miles east of Sheffield. DSA closed in 2022 after the previous airport operator withdrew. This led to the CAA removing the controlled airspace and flight procedures which supported the airports operations.
- 1.1.2 In March 2024, City of Doncaster Council (CDC) secured a 125-year lease for the site, and began work to reinstate the airport licence, establish a local air traffic control service, and prepare for scheduled passenger and cargo services to return from 2027/28.
- 1.1.3 To restore the controlled airspace and procedures needed for DSA to reopen safely and bring passenger and cargo flights back to the region, CDC are sponsoring an Airspace Change Proposal – ACP-2024-039.
- 1.1.4 The reopening of DSA is the centrepiece of South Yorkshire Airport City (SYAC), a major regional growth programme designed to restore aviation services and unlock thousands of new jobs across advanced manufacturing, engineering, logistics and green technologies. The project is being delivered through a partnership between national government, the South Yorkshire Mayoral Combined Authority and CDC.
- 1.1.5 Government backing for the SYAC programme has enabled significant investment to prepare the airport for reopening, reflecting national importance of restoring regional connectivity, supporting trade and driving economic growth across the North. The airport’s return forms part of the Governments wider devolution agenda, demonstrating how locally led, nationally supported investment can deliver regeneration, skilled employment and long-term prosperity.

## 1.2 The Airspace Change Process

- 1.2.1 In December 2017, the Civil Aviation Authority (CAA) reformed the airspace change process and introduced [CAP1616](#), guidance on the regulatory process for changing notified airspace design and planned and permanent redistribution of air traffic. The updated fifth edition was published in November 2023.
- 1.2.2 CAP1616 lays out the regulatory process for changing flight paths, including the community engagement requirements. Proposals for changes to flight paths are submitted to, assessed, and approved by the CAA following the guidance set out in CAP1616.
- 1.2.3 There are seven-stages which provide a framework for changing airspace and CAP1616 places significant importance on engaging a wide range of stakeholders, including potentially affected communities.
- 1.2.4 The CAA monitors the progress of an airspace change proposal against the requirements of the process at key defined points, called gateways. At each gateway, the CAA will assess whether the relevant process requirements have been met, and whether to approve progress to the next stage.

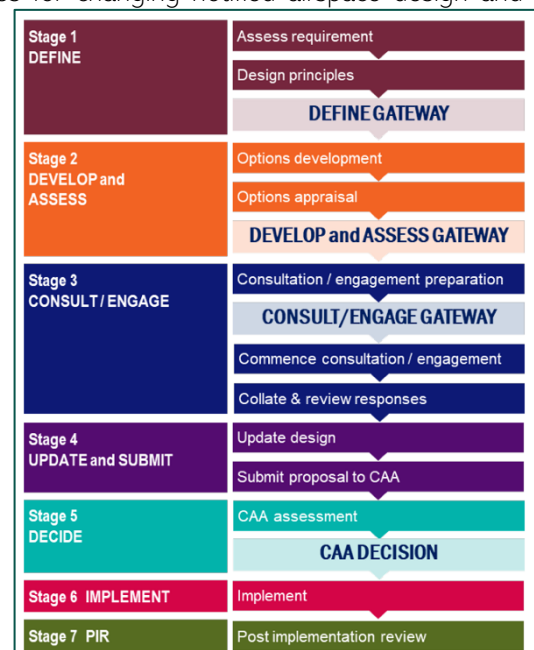


Figure 1: 7-stages of CAP1616 (Edition 5)

- 1.2.5 Each permanent airspace change proposal is assigned a 'level' depending on the characteristics of the change and potential for impacts, which is in part based on the altitude and location in which the changes occur. The application of levels enables the airspace change process to accommodate different types and complexities of airspace change proposals by applying the requirements in a proportionate way.
- 1.2.6 From September – December 2025, the CAA conducted a consultation regarding proposed changes to CAP1616 Version 5.1. The updated process and guidance are expected to be ready by the end of 2026. This submission has been written in accordance with CAP1616 Version 5.1<sup>1</sup>.

### ***Scaling of the airspace change process***

- 1.2.7 In accordance with regulatory principles, the CAA will apply the airspace change process in a reasonable and proportionate manner that can accommodate flexibility. They will consider scaling the airspace change process further within the requirements of each level, when there is a good reason, and it is proportionated to do so.
- 1.2.8 If a change sponsor considers that a specific airspace change proposal warrants further scaling, it must raise and minute this request at the assessment meeting. Any proposed further scaling to the airspace change process must be approved and published by the CAA on the airspace change portal.

## **1.3 The Airspace Modernisation Strategy and the Masterplan**

- 1.3.1 The Airspace Modernisation Strategy (AMS) was first published in 2018 and set out the 'ends, ways and means', of modernising airspace through a series of 'delivery elements' that will update its design technology, and operations.
- 1.3.2 As covered in the Statement of Need, in 2018, DSA successfully implemented PBN procedures, becoming an early adopter of PBN concepts and aligning its procedures with the UK AMS and ICAO global navigation plan. More information on that airspace change can be found [here](#).
- 1.3.3 The AMS was updated in 2023 and split into 3 parts, published separately. More information can be found [here](#). The AMS vision is to deliver quicker, quieter, and cleaner journeys and more capacity for the benefit of those who use and are affected by UK airspace. The AMS does not propose specific airspace change, but a key deliverable is a masterplan of airspace changes that will be necessary for modernisation.
- 1.3.4 Following the publication of the AMS, the Airspace Change Organising Group was established to co-ordinate the national programme. ACOG developed the Masterplan, a single coordinated implementation plan for airspace changes in the UK up to 2040. Across all iterations of the masterplan, it will:
- Identify when and where airspace change proposals are needed, with proposed timelines for implementation;
  - Describe how these proposals relate to each other, and highlight potential conflicts between their designs;
  - Explain how trade-off decisions to resolve these conflicts have been made'
  - Demonstrate the anticipated cumulative impact of all the airspace change proposals.
- 1.3.5 The Masterplan is now on Iteration 3 and is being developed separately for each region of the UK. The masterplan region for the airports in the vicinity of Doncaster Sheffield Airport is referred to as the Manchester Terminal Manoeuvring Area cluster and includes Manchester Airport, Liverpool Airport, East Midlands Airport, Leeds Bradford Airport, Birmingham Airport and NERL.

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<sup>1</sup> More information on the CAA CAP1616 consultation can be found [here](#).

### ***Doncaster Sheffield Airport and the MTMA***

- 1.3.6 Doncaster Sheffield Airport is not part of the MTMA Masterplan, and therefore the masterplan does not articulate any dependencies with other airports in the cluster.
- 1.3.7 It is likely that the re-introduction of controlled airspace at DSA will create interactions with Leeds Bradford Airports existing arrival routes and potentially departure routes.

## **1.4 Doncaster Sheffield Airport ACP – Assessment meeting with the CAA**

- 1.4.1 The assessment meeting allows the change sponsor to discuss with the CAA the airspace issues and opportunities giving rise to the proposed change, how the change will address those issues, and how the change sponsor intends to proceed.
- 1.4.2 The assessment meeting with the between Doncaster Sheffield Airport and the CAA took place on 3 September 2025. The presentation provided by DSA is available on the CAA Portal [here](#).

### ***Scaling of this proposal***

- 1.4.3 As stated in CAP1616 f, paragraph 2.25, during the assessment meeting, there may also be a discussion on how the airspace change process could be scaled.
- 1.4.4 During the assessment meeting, DSA stated that, whilst maintaining transparency and providing meaningful opportunities for stakeholder input, they would aim to progress this proposal at a faster pace than typical Level 1 ACPs. CDC emphasised, that although the intent is to fast track the process, all CAP1616 requirements will be fully met.
- 1.4.5 During the discussion on the provisional process timescales, CDC outlined the intention to combine Stages 1 and 2 of the CAP1616 process.
- 1.4.6 Following the Assessment Meeting, the CAA agreed to the combining of Stages 1 and 2 with a combined Define and Develop and Assess Gateway to take place on 30 April 2026. The full minutes of the meeting are available on the CAA Portal [here](#). The timeline for the ACP is available [here](#).
- 1.4.7 The Stage 1 Design Principle Submission document and associated appendices is available on the CAA Portal [here](#). The Statement of Need for this proposal is [here](#).
- 1.4.8 This document is the CAP1616 Stage 2(A) Design Options and Design Principle Evaluation submission document.

## 2. CAP1616 STAGE 2A

### 2.1 Requirements

2.1.1 The following table highlights the CAP1616 (v5.1) Stage 2 requirements for an airspace change sponsor and provides the location in this document, or associated appendix, where this information can be found.

CAP1616 Reference	CAP1616 Requirement	Location
CAP1616 V5.1 Para 3.15 CAP1616 f Paras 3.11-3.14	<p>Develop the Baseline Scenarios</p> <p>Baseline scenarios is the term used to refer to these future scenarios without the airspace change. The change sponsor must develop the following baseline scenarios:</p> <ul style="list-style-type: none"> <li>Year of Implementation without the airspace change proposal (Year 1)</li> <li>10 years after implementation without the airspace change proposal (Year 10)</li> </ul>	<p><a href="#">Section 3</a> <a href="#">Stage 1 Submission Document</a> <a href="#">Section 3</a></p>
CAP1616 V5.1 Para 3.15 CAP1616 f Paras 3.15-3.25	<p>Develop List of Design Options</p> <p>The change sponsor must develop a list of design options that address the statement of need and align with the criteria from the design principles:</p> <ul style="list-style-type: none"> <li>Year of implementation with the airspace change proposal (Year 1)</li> <li>10 years after implementation with the airspace change proposal (Year 10).</li> </ul> <p>Take account of any additional growth facilitated by the airspace change, as well as business as usual growth.</p> <p>Assess the with airspace change proposals against the without (Year 1 and Year 10)</p> <p>Provide traffic forecasts for Year 1 and Year 10.</p> <p>Identify any critical interdependencies with neighbouring ANSPs.</p>	<p><a href="#">Section 4.1</a> <a href="#">Section 4.5</a> <a href="#">Section 4.7</a> <a href="#">Section 4.8</a> <a href="#">Section 4.9</a> <a href="#">Stage 2 Initial Options</a> <a href="#">Appraisal</a></p>
CAP1616 V5.1 Para 3.15 CAP1616 f Para 3.26	<p>Single/Limited Design Options</p> <p>Provide supporting justification if a single design option is presented.</p>	N/A
CAP1616 V5.1 Para 3.16 CAP1616 f Paras 3.27-3.30	<p>Stakeholder Engagement.</p> <p>Must share the baseline scenarios and design options with the same stakeholders as in Stage 1.</p> <p>Explain the engagement approach/methodology used and rationale for doing so.</p> <p>Provide relevant engagement evidence.</p> <p>Demonstrate what they have heard, and how feedback has, or has not informed the development of the baseline scenarios and design options.</p>	<p><a href="#">Section 4.2</a> <a href="#">Section 4.3</a> <a href="#">Section 4.4</a> <a href="#">Stage 1 Submission Documents</a> <a href="#">Appendices A &amp; B<sup>2</sup></a></p>
CAP1616 V5.1 Para 3.17 CAP1616 f Paras 3.31-3.34	<p>Design Principle Evaluation</p> <p>Must describe the methodology used for the design principle evaluation.</p>	<p>Table 12 <a href="#">Section 5.1</a> <a href="#">Section 5.2</a></p>

<sup>2</sup> As stated in paragraph 1.4.6, Stage 1 and Stage 2 are combined submissions

	<p>Evaluate how the baseline scenarios and the design options against the design principles, specifying if they have been met, partially met or not met. Explain the rationale to progress or discontinue design options.</p>	<p><a href="#">Section 5.3</a> <a href="#">Section 5.4</a></p>
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*Table 1: List of CAP1616 f (V5) Stage 2 requirements*

### 3. BASELINE SCENARIO

- 3.1.1 For full context, the relevant section from CAP1616 f, paragraphs 3.11-3.14 (page 30) are included below.

#### **The change sponsor must develop the baseline scenarios**

3.11 The change sponsor must undertake an assessment of the impacts of the future scenario without the airspace change so that a comparison can be made against the impacts of the design options.

3.12 Because of the time needed to go through the airspace change process and implement change, the future scenario without airspace change will need to assume the current-day airspace situation (that is, airspace structures and behaviours) but reflect other changes to the use of the airspace independent of the proposed airspace change, for example, traffic growth and fleet changes that occur as part of business as usual. The future scenarios without the airspace change must also take account of anticipated changes to the types of aircraft operating in the airspace. Throughout this guidance, baseline scenarios is the term used to refer to these future scenarios without the airspace change and are developed for:

- year of implementation without the airspace change proposal (year 1); and
- 10-years after implementation without the airspace change proposal (year 10).

3.13 The baseline scenarios must also be considered in relation to their context which may be changing, by taking due consideration of known or anticipated factors that might affect it. For example, the change sponsor must identify and take account of any planned housing developments which have been given consent or known housing provision allocated within local development frameworks. These additional housing provisions must be factored into the baseline as they increase households and population affected by the change. Inclusion of planned housing development must be agreed with relevant stakeholders including local authorities.

3.14 Change sponsors must not assume that an airspace change has already taken place as part of the future baseline scenario, since this would have required an airspace change decision and associated assessment.

- 3.1.2 In the case of DSA, the baseline scenario is what is there today, as described in “Current Day Scenario” Section 3 of the Stage 1 Design Principle Submission Document. That is without a licensed, operational Doncaster Sheffield Airport.
- 3.1.3 As a minimum DSA would need an Aerodrome Traffic Zone (ATZ), Instrument Approaches and an appropriate level of Air Traffic Service to be provided, with the first two items requiring an airspace change proposal and subsequent consent.
- 3.1.4 This is considered in Option 0 but there is no ‘Do Nothing’ scenario for DSA. CAP1616 f paragraphs 2.35-2.37 requires sponsors to set out the current day scenario to describe the current airspace structures, routes, instrument flight procedures, flight patterns, aircraft types, frequency of movements and typical altitudes.
- 3.1.5 A future baseline for this ACP in any year does not change for any operations directly associated with DSA. Any operations of other airspace users outside of DSA could change, however this cannot be reasonably forecast by CDC. We cannot predict how other airports, military operations or general aviation activities would evolve out to 2037 (10-years after implementation).
- 3.1.6 As CAP1616f 3.14 states, change sponsors must not assume that an airspace change has already taken place as part of the future baseline scenario, since this would have required an airspace change decision and associated assessment. Therefore, CDC cannot assume any change to the surrounding airspace structures in the future baselines.

- 3.1.7 The future Year 1 (2028) and Year 10 (2037) baseline scenarios for this ACP are therefore as described in the Current Day Scenario, with the exception of us taking account of any planned housing developments which have been given consent or known housing provision allocated within local development frameworks. These have been provisionally<sup>3</sup> identified and are presented in the [Stage 2B Initial Options Appraisal document](#). The current day scenario is described in detail within section 3 of the Stage 1 submission document available on the portal [here](#).

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<sup>3</sup> Inclusion of planned housing development must be agreed with relevant stakeholders including local authorities (CAP1616f 3.13). The housing developments have not yet been agreed for inclusion with local authorities in this stage of the ACP. They will be agreed prior to Full Options Appraisal in Stage 3.

## 4. DESIGN OPTIONS

4.1.1 Owing to the objective of this airspace change, one option was initially developed which looked to re-introduce the notified airspace arrangements for DSA that were in place at the time of the airport’s closure in 2022. This was called Option 1. DSA then engaged with stakeholders on Option 1 and used the feedback to develop three further options (Option 0, Option 2 and Option 3). The following subsections initially describe Option 1, before providing details of the engagement and then the three further options developed as a result of that engagement.

### 4.2 Option 1 – Reinstate the same controlled airspace structure and flight procedures that were in operation before the airport closed in 2022

4.2.1 This option proposes to re-introduce the notified airspace arrangements for DSA that were in place at the time of the airport’s closure in 2022.

4.2.2 CDC considered this to be the most practical starting point because the previous airspace structure was developed in line with airline requirements, informed by widespread consultation on an earlier ACP, and operated safely for many years. Reinstating it is likely to provide a stable foundation for the return of passenger, cargo and general aviation flights, whilst acknowledging that refinements can be explored through stakeholder engagement.

4.2.3 The reinstated airspace would include the Doncaster Sheffield Control Zone (CTR) and a series of Control Areas (CTAs). These were previously established as Class D airspace, providing air traffic control services for aircraft entering or operating within the area. The exception was CTA 13, which operated as Class E with an associated Transponder Mandatory Zone (TMZ) and Radio Mandatory Zone (RMZ) to ensure appropriate surveillance and communications for all users accessing that segment of airspace.

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#### Classe E+

4.2.4 Class E+ is an unofficial shorthand term for Class E controlled airspace enhanced with the provision of a Transponder Mandatory Zone (TMZ<sup>4</sup>) and/or Radio Mandatory Zone (RMZ<sup>5</sup>).

4.2.5 The objective of an RMZ/TMZ is to enhance the conspicuity of aircraft operating within, or in the vicinity of, complex, or otherwise busy airspace when the establishment of a more restrictive classification of airspace is not warranted, in order to maintain a balance between safe, efficient operations and fair, equitable access for all airspace users. Enhanced conspicuity can enable, as appropriate:

- airborne collision warning and/or avoidance systems;
- a ‘known’ or ‘recognised’ air traffic environment which, in turn, permits ATS to provide more specific traffic information on collision hazards; and,
- ground-based safety nets such as short-term conflict alert (STCA) and minimum safe altitude warning (MSAW).

4.2.6 In addition, a RMZ may also be notified to facilitate the provision of flight information, alerting and search and rescue services.

4.2.7 In the case of Options 1-3, they consider entry to all Class E volumes without an ATC clearance to require the carriage and operation of both a pressure-altitude reporting transponder and a radio.

<sup>4</sup> An airspace of defined dimensions wherein the carriage and operation of radio equipment is mandatory

<sup>5</sup> An airspace of defined dimensions wherein the carriage and operation of pressure-altitude reporting transponders is mandatory

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- 4.2.8 It is unusual for ACP sponsors to develop airspace design options in Stage 2 to a high degree of fidelity. Instead, options are usually developed at a conceptual level, shortlisted and then refined in Stage 3 ahead of consultation on a preferred option or options<sup>6</sup>.
- 4.2.9 This ACP is unique in this regard as DSA has access to the previously promulgated airspace arrangement and, via the procurement of historical radar data from NATS, was able to share with stakeholders the traffic patterns that are likely to be experienced from DSA arrivals and departures if this option were to be implemented (see Figure 4 and Figure 5). This information was shared with stakeholders in our [Stage 1 and 2 engagement material](#) in December 2025 and March 2026.
- 4.2.10 We are unable to provide the associated level of detail of overflight patterns for Options 2 and 3. Therefore Figure 4 and Figure 5 provide an overview of Option 1 in a single image, allowing us to illustrate Options 2 and 3 in the same format.
- 4.2.11 Whilst Option 1 is mature for obvious reasons, Options 2 and 3 are not as mature are by no means definitive. All route centrelines, controlled airspace dimensions and classifications in Options 2 and 3 are subject to change. They will be further refined as we seek to evolve a solution that best balances the competing stakeholder requirements, in accordance with further stakeholder consultation and engagement and in accordance with CAA Policy and airspace and Instrument Flight Procedure (IFP) design criteria.
- 4.2.12 Figure 4 shows the proposed Option 1 DSA controlled airspace construct in black, with Standard Instrument Departure (SID) shown in red, the NPR corridors shown in blue and the straight, final approach centrelines also shown in black. Airspace classifications are Class D unless stated otherwise.

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<sup>6</sup> CAP1616f 3.16: Conceptual design options can be useful for large and complex projects, especially those that share interdependencies with other projects, where it is necessary to evaluate different conceptual solutions. The presentation of conceptual design options should provide enough detail for the concepts to be evaluated qualitatively through the design principle evaluation and initial options appraisal, and those showing potential can be refined and quantified further in Stage 3.

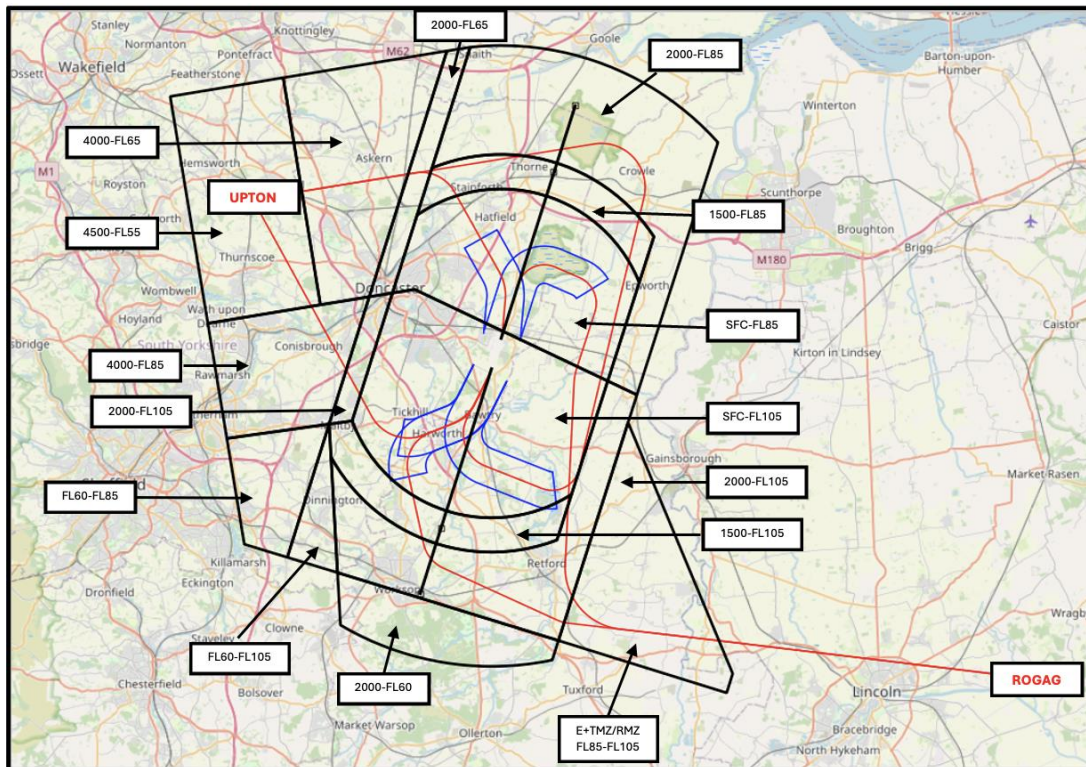


Figure 2: Option 1

4.2.13 Figure 5 shows the same region but with adjacent promulgated airspace boundaries and restrictive areas included to aid industry stakeholder situational awareness.

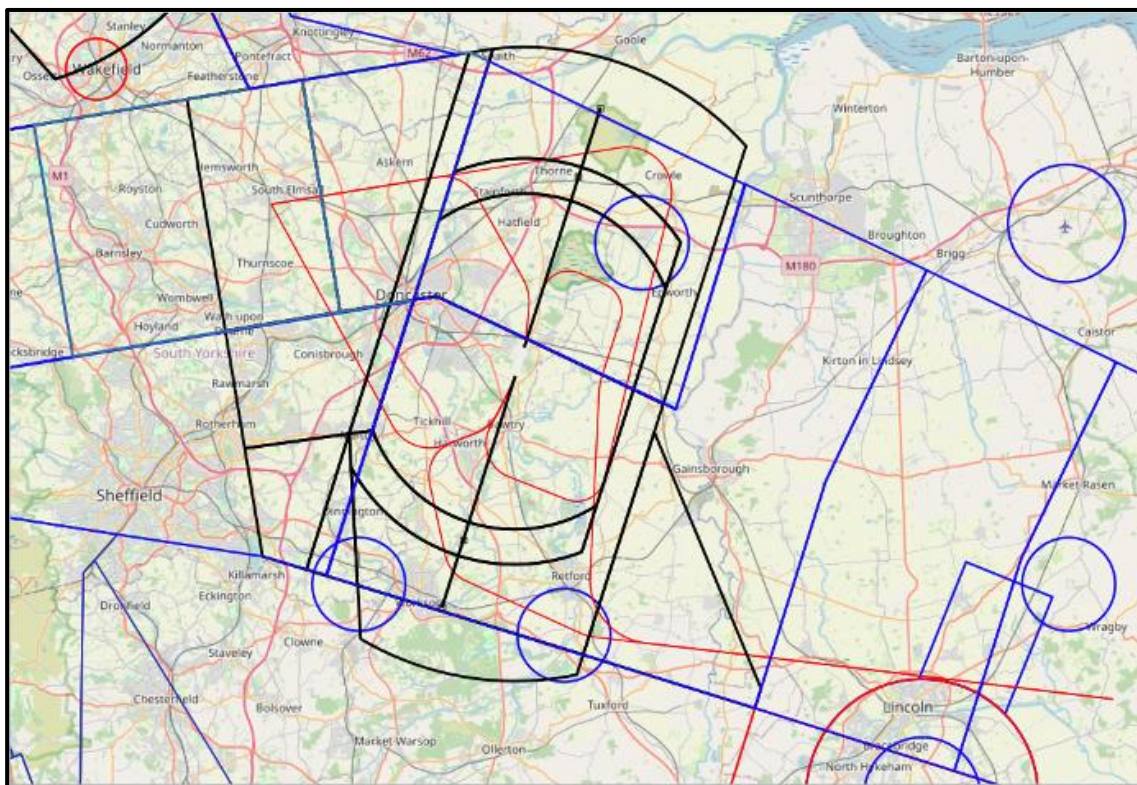


Figure 3: Option 1 - with adjacent airspace boundaries/restrictive areas

- 4.2.14 Air traffic services would be provided by an air traffic control unit, delivering Tower and Approach Radar services consistent with the airport's former operation. Recruitment for operational personnel is underway to support the re-establishment of these services.
- 4.2.15 ATC would vector all arrivals onto final approach, usually to the Instrument Landing System (ILS) or occasionally to the RNP Approach. Departures will follow RNAV1 SIDs unless vectored when beyond the NPR or if required for safety reasons. Omni-Directional Departures will exist for any aircraft unable to fly the RNAV1 SIDs.
- 4.2.16 Figure 4 and Figure 5 show the previous traffic patterns up to 7,000ft and it can be assumed that similar patterns would emerge if this option was implemented.

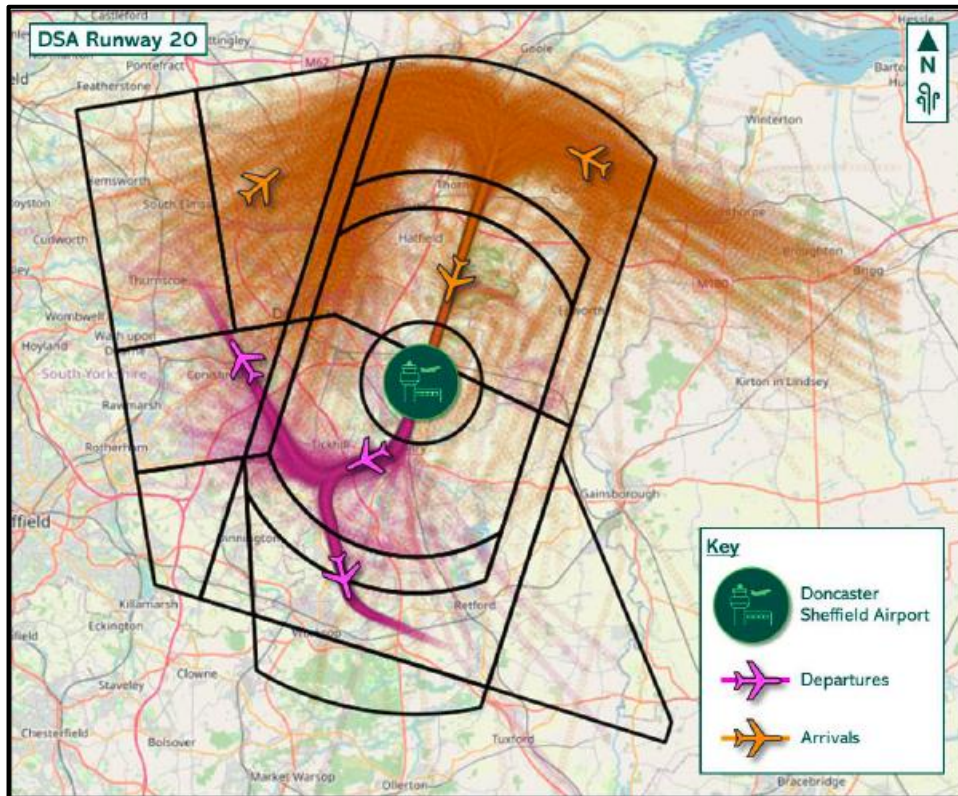


Figure 4: RWY20 traffic patterns that could be expected with Option 1

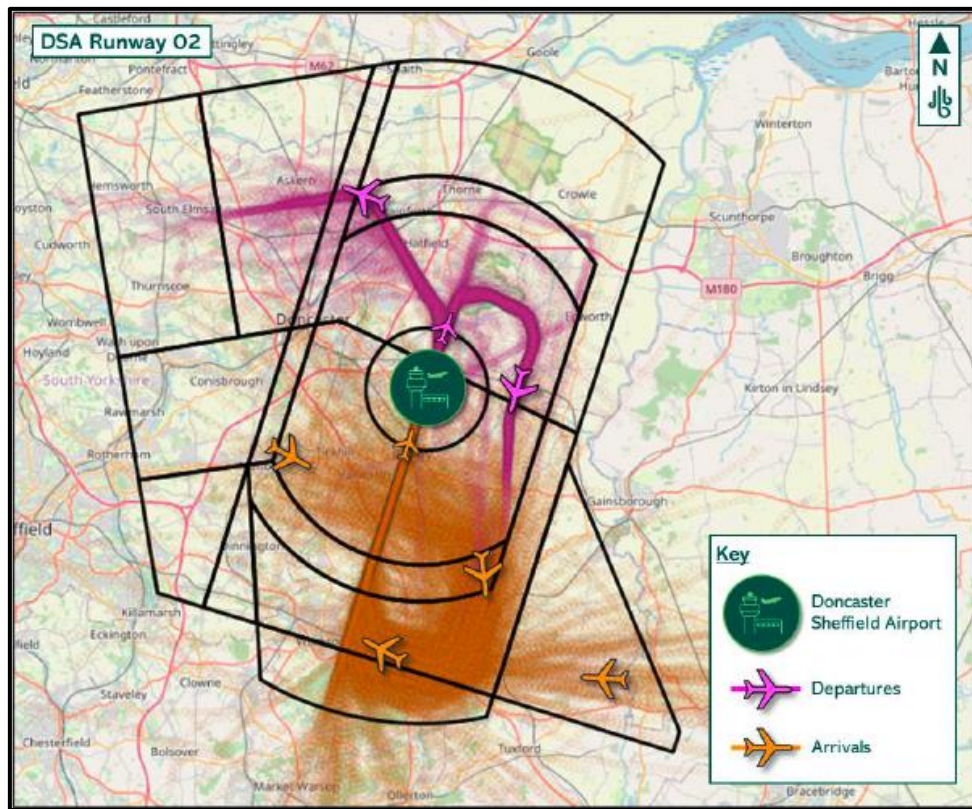


Figure 5: RWY02 traffic patterns that could be expected with Option 1

4.2.17 It can be expected that multiple Letters of Agreement (LoAs) would need to be reinstated between DSA and other airports, ANSPs and airspace users to reduce the impact on adjacent operations.

### 4.3 Stakeholder Engagement

4.3.1 As stated in the Stage 1 Design Principle submission document, the CAA approved DSA to combine Stages 1 and 2 of the CAP1616 process. Therefore, the stakeholder engagement which took place covered the requirements of both stages.

4.3.2 The CAP1616f stakeholder engagement requirements, state that the change sponsor must engage with the same stakeholders as in Stage 1<sup>7</sup>.

4.3.3 The Airport Consultative Committee appointed a Chair in October 2025 and established the first ACC meeting in January 2026. The committee will meet monthly until the airport is established, the meeting schedule will then be reviewed in line with current guidelines.

4.3.4 The following table lists the members of the Airport Consultative Committee, some of which are included in the stakeholder tables 2-8.

Airport Consultative Committee	
Chair	Blaxton Parish Council
Bassetlaw Council	North Lincolnshire Council
2Excel Aviation	Save DSA

<sup>7</sup> CAP1616 f Paragraph 3.27

Auckley Parish Council	Environment Agency
Members of City of Doncaster Council	

*Table 2: Airport Consultative Committee*

4.3.5 The following tables list the stakeholders engaged.

**Councils/Authorities**

4.3.6 DSA identified 9 Councils/Authorities/County Councils, within the potentially affected area, all those listed in Table 3 were contacted as part of the Stage 1 and Stage 2 combined engagement.

4.3.7 The list includes the Yorkshire and Humber Councils which represents the 15 local authorities in the Yorkshire and Humber region, acting as a collaborative body, and the Parish Councils Joint Consultative Committee, which comprises of 8 elected members from Doncaster Council and representatives from the borough’s Parish and Town Councils. Further information on the PCJCC, including the current members can be found [here](#).

4.3.8 The following table shows the councils, authorities and county councils who were contacted:

Councils/Authorities/County Councils	
East Riding	North Lincolnshire Council
Lincolnshire County Council	Sheffield Council
Yorkshire & Humber Councils <sup>8</sup>	Barnsley Met Borough Council
Rotherham Met Borough Council	Parish Councils Joint Consultative Committee (via PCJCC Support) <sup>9</sup>
Bassetlaw District Council	

*Table 3: List of Councils/Authorities/County Council stakeholders*

**Industry Stakeholders**

4.3.9 This is a wide range of groups which include, local airports, including those involved in the MTMA and local airfields, airlines who may operate from DSA in the future, the National Air Traffic Management Committee (NATMAC), the military, other airspace users and GA organisations.

4.3.10 NATMAC is a non-statutory advisory board chaired by the CAA. The committee is consulted for advice and views on any major matter concerned with airspace management. It is widely recognised that engagement activities of an airspace change sponsor usually include engagement with relevant NATMAC members. This is because NATMAC has representation from across the UK Aviation community. The CAP1616 airspace change process specifically requires engagement with relevant NATMAC members during the early stages of the process to support the development of design principles and design options, prior to formal consultation occurring.

4.3.11 Table 4 lists the organisations which are members of NATMAC.

NATMAC Members <sup>10</sup>
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<sup>8</sup> Represents 15 local authorities in the Yorkshire & Humber region, acting as a collaborative body

<sup>9</sup> A consultative body for communications between CDC officers, elected members and local Parish/Town Councils

<sup>10</sup> As of June 2025, list provided by the CAA

Airlines UK	AirportsUK
Airfield Operators Group (AOG)	Aircraft Owners & Pilots Association (AOPA)
Airspace Change Organising Group (ACOG)	Association of Remotely Piloted Aircraft Systems UK (ARPAS-UK)
Aviation Environment Federation (AEF)	British Airways (BA)
BAe Systems	British Airline Pilots Association (BALPA)
British Balloon and Airship Club	British Business & General Aviation Association (BBGA)
British Gliding Association (BGA)	British Helicopter Association (BHA)
British Hang Gliding and Paragliding Association	British Microlight Aircraft Association (BMAA)
British Skydiving	Drone Major
General Aviation Alliance (GAA)	Guild of Air Traffic Control Officers (GATCO)
Honourable Company of Air Pilots (HCAP)	Helicopter Club of Great Britain (HCGB)
Isle of Mann CAA	Light Aircraft Association (LAA)
Low Fare Airlines	Military Aviation Authority (MAA)
Ministry of Defence – Defence Airspace & Air Traffic Management (MOD-DAATM)	NATS
Navy Command HQ	PPL/IR (Europe)
UK Airprox Board	UK Flight Safety Committee (UKFSC)
United States Visiting Forces (USVF)	HQ United States Country Rep-UK (HQ USCR-UK)

*Table 4: List of NATMAC Members*

4.3.12 Table 5 shows the local airports who were identified as stakeholders, this includes the major airports participating in the MTMA programme and local airfields. The airports who are members of the MTMA have been marked with an asterix.

Airports & Airfields	
Leeds Bradford Airport*	Manchester Airport*
Liverpool Airport*	East Midlands Airport*
Humberside Airport	Wickenby Airfield
Leeds East Airport	Derby Aeroclub
Tattenhill Aviation	Sandtoft Airfield Yorkshire Aero Club

Retford Gamston Airport	Sherburn-in-Elmet-Airfield
Darlington Glidign Club	Headon Microlight Airfield
Netherthorpe Airfield	Sturgate Airfield
Kirton-in-Lindsey Glider Field	Breighton Airfield
Burn Gliding Club	

**Table 5: List of Airfield/Airport Stakeholders**

4.3.13 Table 6 is a list of airline operators and other aviation industry stakeholders who, at the time of engagement, may be impacted by this proposal.

Airlines/Other Aviation industry stakeholders	
2Excel	█
█	█
█	NPAS
Yorkshire Air Ambulance	ACOG
NATS-NERL	Fly Doncaster Ltd
Strategic Aviation Special Interest Group (SASIG)	

**Table 6: Airlines & other aviation industry stakeholders**

**Community Stakeholders**

4.3.14 This group includes local stakeholder organisations and groups, including the Airport Consultative Committee.

Community Stakeholders	
Airport Consultative Committee	Doncaster Chamber of Commerce
Save DSA <sup>11</sup>	Team Doncaster <sup>12</sup>

**Table 7: Community stakeholders**

**Environmental Organisations/Groups**

4.3.15 DSA identified the following environmental organisations/representatives as stakeholders for this airspace change proposal:

Environmental Organisations/Groups

<sup>11</sup> A local community group set up to support plans to save DSA

<sup>12</sup> <https://www.teamdoncaster.org.uk/>

Yorkshire Wildlife Trust	Doncaster Civic Trust (Historic Buildings)
English Heritage (Yorkshire Historic England)	Yorkshire Environment Agency
National Trust	Natural England
Council for the Preservation of Rural England (CPRE)	

**Table 8: List of Environmental Organisations/Representatives**

**Method of Engagement**

- 4.3.16 As stated in section 1.4, this ACP has been scaled to allow DSA to progress this proposal in a proportional manner. As DSA were engaging on a single option, to reinstate the controlled airspace and flight procedures which existed prior to the airport closure in 2022, engagement via email allowed the information to be articulated in the same way to all stakeholders.
- 4.3.17 DSA created comprehensive engagement material, providing detailed background information and information on the proposal, which was distributed to all stakeholders. As this was combined with the Stage 1 design principle engagement, all the same stakeholders were contacted. Stakeholders were emailed on 3 December 2025, with a feedback deadline of 14 January 2026 (6 weeks).
- 4.3.18 In the initial email which accompanied the Stage 1 and Stage 2 engagement material and in the reminder email, stakeholders were offered the opportunity to request a briefing or discussion with DSA if they wished.
- 4.3.19 Copies of emails sent to stakeholders are available in [Appendix A of the Stage 1 Design Principle Submission document](#).

**Stakeholder Engagement Material**

- 4.3.20 In this Stage 2 (A) Design Options and Design Principle Evaluation submission document, we will focus on the elements of the engagement material and feedback received in relation to the Stage 2 engagement only. For information regarding the elements of the Stage 1 engagement, please see the Stage 1 Submission document [here](#).
- 4.3.21 The engagement material including information regarding the following topics<sup>13</sup>:
  - Introduction to this engagement
  - CAP1616 overview and requirements
  - Background regarding DSA
  - Do-Nothing baseline Scenario (Current Day Scenario)
  - Initial Design Option for Arrivals & Departures (Option 1)
    - Proposed Controlled Airspace Structure
    - Noise Preferential Routes for Departures
  - DSA Planning Restrictions & Traffic Forecasts
- 4.3.22 Stakeholders were invited to provide feedback and were asking the following question:

<sup>13</sup> Material also covered Stage 1 stakeholder engagement topics, which is referenced in the Stage 1 submission document

*Are there any modifications to the airspace dimensions, airspace classifications or flight procedures described in the initial design option that you would like to suggest?*

## 4.4 Stakeholder Feedback

- 4.4.1 Doncaster Sheffield Airport received responses from 29 stakeholders.
- 4.4.2 Table 9 includes the feedback received which relate to Stage 2 only. Feedback received which is relevant to the Stage 1 engagement material has not been included in this table and is included and addressed in the Stage 1 submission document. Where stakeholder feedback has combined information on both stages, it has been included in Table 9.
- 4.4.3 Full copies of the feedback received are available in Appendix B to the [Stage 1 Submission Document](#).

Stakeholder Group	Stakeholder Organisation/Name	Stage 2 Feedback Received	DSA Response (if required)
Councils'/ Authorities/ County Councils	Bassetlaw District Council	<p>We note the proposal to reinstate the previous controlled airspace structure and associated procedures. Our comments are:</p> <ul style="list-style-type: none"> <li>-General Support: We agree that reinstating the former structure is a practical starting point, given its proven safety record.</li> <li>-Noise Management: We request confirmation that the Night Noise Quota System will be robust and enforceable, and that NPR compliance will be monitored effectively.</li> <li>-Airspace Boundaries: Please consider whether minor adjustments to controlled airspace boundaries and associated flight paths could reduce impact on local communities by avoiding unnecessary overflight of more densely populated or noise-sensitive areas within Bassetlaw.</li> <li>-Environmental Assessment: We would welcome further detail on how environmental impacts (noise, emissions) will be assessed and mitigated during the appraisal stage.</li> </ul> <p>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.</p>	<p>Thank you for your feedback.</p> <p>Based on stakeholder feedback such as yours, we have created some additional options which you can find in <a href="#">Sections 4.7 and 4.8</a> of this document. In particular, Option 3 presents a rather different flight path design which uses modern technology for arrivals which would reduce the numbers of people overflown within your council. Further information on environmental assessments can be found in our Stage 2(B) Initial Options Appraisal document but please also see <a href="#">CAP1616i Environmental Assessment requirements and Guidance for Airspace Change Proposals</a></p> <p>We expect to consult on the preferred option later this year and that will provide clear communication on anticipated flight paths and noise contours.</p>
	Lincolnshire County Council	<p>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 Stage 1 or Stage 2 Engagement questions.</p> <p>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.</p> <p>We look forward to working closely with you in the future and receiving notification of the full public consultation at Stage 3.</p>	<p>Thank you for your feedback.</p>
	UK Airprox Board	<p>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</p>	<p>Thank you for your feedback.</p>

Stakeholder Group	Stakeholder Organisation/Name	Stage 2 Feedback Received	DSA Response (if required)
<p>Aviation Industry (NATMAC)</p>	<p>British Gliding Association</p>	<p>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.</p> <p>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".</p> <p>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.</p> <p>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.</p>	<p>A follow up meeting was arranged between DSA and the BGA to discuss the feedback provided for Stages 1 and 2. More information is available in Section 4.4 and in Appendix A of the Stage 1 Submission Document.</p> <p>Thank you for your feedback. As a result of stakeholder feedback such as yours we have created additional options which you can find in <a href="#">Sections 4.4 - 4.8</a> of this document. This includes an in-depth consideration (Option 0) of operating commercial flights from DSA in Class G (uncontrolled) airspace and an Option 3 that enhances the uses of PBN to reduce the volume of controlled airspace required.</p> <p>We look forward to receiving feedback from you on this option so we can further refine in Stage 3.</p>
	<p>NATS NERL plc</p>	<p>Unfortunately, NATS NERL plc cannot support the proposed approach to reinstate DSA's previous airspace, procedures, NPRs and associated arrangements exactly as they were when the airport was last operational. This is for the following reasons:</p> <ol style="list-style-type: none"> <li>1) NATS NERL plc does not believe this will provide the most optimal solution to meet DSA's design principles.</li> <li>2) NATS NERL plc has been working with other Airports within the MTMA under ACP-2019-77 which is currently at stage 3.</li> </ol> <p>The reinstatement of DSA's previous controlled airspace, procedures and NPRs 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</p>	<p>Thank you for your feedback. As a result of stakeholder feedback such as yours we have created additional options which you can find in <a href="#">Sections 4.4 - 4.8</a> of this document. In particular, Option 3 is titled "Use of Radius-to-Fix to create less restrictive CAS structures and to aid future MTMA integration."</p> <p>We look forward to receiving feedback from you on this option so we can further refine in Stage 3.</p>

Stakeholder Group	Stakeholder Organisation/Name	Stage 2 Feedback Received	DSA Response (if required)
		<p>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 governments open letter on NATS prioritisation.</p> <p>However, through engagement with NATS NERL plc, we believe that there may be a more optimal solution which will meet 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.</p>	
	<p>General Aviation Alliance</p>	<p>The many statements within the combined Stage 1 &amp; 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.</p> <p>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.</p> <p>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.</p> <p>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,</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>Thank you for your feedback. As a result of stakeholder feedback such as yours we have considered operating commercial flights from DSA in Class G (uncontrolled) airspace. You can find an in-depth consideration of this Option in <a href="#">Section 4.5</a> of this document.</p>

Stakeholder Group	Stakeholder Organisation/Name	Stage 2 Feedback Received	DSA Response (if required)
	Light Aircraft Association	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.	Thank you for your feedback. As a result of stakeholder feedback such as yours we have considered operating commercial flights from DSA in Class G (uncontrolled) airspace. You can find an in-depth consideration of this Option in <a href="#">Section 4.5</a> of this document.
	BHPA	<p>We have two concerns regarding whether the CAP1616 process has been followed correctly and proportionally:</p> <ol style="list-style-type: none"> <li>1. The consultation documentation has not been posted onto the CAP1616 web portal as it should have been as soon as it was published,</li> <li>2. Allowing such a short time window for responses which also included the Christmas and New Year holiday period was inappropriate.</li> </ol> <p>Our members operate from hills, sea cliffs, licensed and unlicensed aerodromes, tow sites and agricultural fields, from the surface to cloud base, both singly and in gaggles of multiple soaring aircraft. They do not routinely carry air band 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.</p>	<p>Thank you for your feedback.</p> <p>This round of engagement is in line with Stages 1 and 2 of CAP1616 and not a formal consultation in line with Stage 3 of the process. The consultation will follow in due course. 4 weeks is a common length of time for stakeholder engagement in the first 2 stages of the ACP. We extended this to 6 weeks to compensate or the Christmas and New year period.</p> <p>(A follow up meeting was arranged between DSA and the BGA to discuss the feedback provided for Stages 1 and 2. More information is available in <a href="#">Section 5.4</a> of this document and in the <a href="#">Stage 2A submission document</a>.)</p>
	MOD – DAATM	<p>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.</p> <p>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.</p> <p>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.</p>	<p>Thank you for your feedback. We have created additional options which you can find in <a href="#">Sections 4.4 - 4.8</a> of this document. In particular, Option 3 is quite different from the previous design however there is not much that can be done to reduce the lateral extent of the proposed CTA that encroaches into the Lincolnshire AIAA (2000ft-FL60) although we will explore possibilities for reducing the upper limit of that section.</p> <p>We look forward to engaging with you further on this option so we can further refine in Stage 3.</p>
Aviation Industry (Airports)	MAG	The area of controlled airspace and proposed operation seems practical. As outlined in response to the Stage 1 Engagement question we would urge Doncaster Sheffield Airport to be mindful of the,	Thank you for your feedback. As a result of stakeholder feedback such as yours we have created additional options which you can find in

Stakeholder Group	Stakeholder Organisation/Name	Stage 2 Feedback Received	DSA Response (if required)
		<p>already well progressed the Future Airspace Strategy Implementation in the Manchester Terminal Manoeuvring Area (MTMA) 'cluster'.</p> <p>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.</p>	<p><a href="#">Sections 4.4 - 4.8</a> of this document. In particular, Option 3 is titled "Use of Radius-to-Fix to create less restrictive CAS structures and to aid future MTMA integration."</p> <p>We look forward to receiving feedback from you on this option so we can further refine in Stage 3.</p>
	<p>Leeds Bradford Airport</p>	<p>Stage 2: Develop and Assess –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."</p> <p>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.</p> <p>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.</p> <p>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 DSA ACP 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</p>	<p>Thank you for your feedback. As a result of stakeholder feedback such as yours we have created additional options which you can find in <a href="#">Sections 4.4 - 4.8</a> of this document. In particular, Option 3 is titled "Use of Radius-to-Fix to create less restrictive CAS structures and to aid future MTMA integration". These sections also include an in-depth justification for controlled airspace which is not predicated on reaching any specific level of forecast Air Transport Movements (ATMs,) but is to enable the safe and efficient operation of scheduled commercial air transport within a busy and complex section of UK airspace, close to other large commercial air transport airports and significant general aviation activity.</p> <p>CAP1616 states <i>"Change sponsors must not assume that an airspace change has already taken place as part of the future baseline scenario, since this would have required an airspace change decision and associated assessment"</i>.</p> <p>Given this CAP1616 statement and also considering DSA is currently a non-operational airport with a need for Controlled Airspace to support its re-opening for commercial air transport operations, the future baseline scenario is zero from a sponsor perspective. This was confirmed by the CAA in the Assessment Meeting: <i>"CDC requested confirmation that, for stakeholder engagement purposes under Stage 1 of the CAP 1616 process, CDC should present the 'no operations' do-nothing baseline as the current-day scenario. The Environmental Regulator confirmed</i></p>

Stakeholder Group	Stakeholder Organisation/Name	Stage 2 Feedback Received	DSA Response (if required)
		<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>	<p><i>this is correct and that, accordingly, there is no modelling required for the baseline scenario itself (estimated impacts of the proposed design will be compared against zero – i.e. no operations).</i> Please see our <a href="#">Stage 2 (B) Initial Options Appraisal document</a> for more detail on the future baseline.</p> <p>You seem to be confusing our engagement material with our Gateway submission document set. To clarify:</p> <p>Our <a href="#">Stage 1 Design Principle submission</a> document details the Current Day Scenario (expanded as requested) and sets out our design principles and how they were evolved through stakeholder engagement.</p> <p>This document (Stage 2(A)) contains a description of the future baseline, all options including the additional options developed as a result of stakeholder feedback such as yours, the design principle evaluation methodology, the design principle evaluation and the design principle evaluation outcomes.</p> <p>Our <a href="#">Stage 2 (B) Initial Options Appraisal document</a> contains our initial options appraisal methodology, the initial options appraisal of our options carried forward from Stage 2A, including the future baseline, and the Initial Options Appraisal outcomes.</p>

Stakeholder Group	Stakeholder Organisation/Name	Stage 2 Feedback Received	DSA Response (if required)
		<p>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)."</p> <p>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.</p>	
	<p>Humberside Airport</p>	<p>Thank you for 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 same management of air traffic in the area.</p> <p>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.</p>	<p>Thank you for your feedback.</p>
	<p>Leeds East Airport</p>	<p>Reinstating the previous controlled airspace structure and flight procedures appears to be the most practical and efficient starting point.</p> <p>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.</p> <p>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.</p>	<p>Thank you for your feedback.</p> <p>As a result of stakeholder feedback such as yours we have created additional options which you can find in <a href="#">Sections 4.4 - 4.8</a> of this document. In particular, Option 3 is titled "Use of Radius-to-Fix to create less restrictive CAS structures and to aid future MTMA integration".</p>
	<p>Gamston Retford Airport</p>	<p>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.</p>	<p>Thank you for your feedback.</p>

Stakeholder Group	Stakeholder Organisation/Name	Stage 2 Feedback Received	DSA Response (if required)
Aviation Industry (Airlines)	█	<p>█ is one of the world's leading tourism groups serving over 34 million global customers annually. In the UK, █ offers quality holidays to over five million British customers each year and █ flies from 20 UK airports to over 80 destinations with c.70 aircraft. Four █ aircraft were based at the airport in Summer 2022 serving short, medium, and long-haul leisure markets. █ was the last commercial airline to operate from the airport before it closed in November 2022.</p> <p>We have been monitoring the progress of the airport re-opening plans. 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.</p> <p>Controlled airspace is essential to ensure safe and efficient passenger operations. [...] 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.</p> <p>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.</p>	Thank you for your feedback.
Aviation Industry (Other Airspace Users)	Gamston Flying School	<p>Gamston flying school supports the reintroduction of controlled airspace and the associated procedures as were previously published.</p> <p>The only comments that have been highlighted are with regards to the CLASS E portion and associated RMZ/TMZ, would it not be cleaner 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 any further engagement and updates on the progress of this ACP as it progresses please.</p>	<p>Thank you for your feedback. Regarding 'ATZ first then work up', as a result of stakeholder feedback such as yours we have considered operating commercial flights from DSA in Class G (uncontrolled) airspace. You can find an in-depth consideration of this Option in <a href="#">Section 4.5</a> of this document.</p> <p>We agree that Class D would be cleaner and simpler for DSA, however we must consider the needs of other airspace users and maximise access.</p>
	DEA Aviation (Gamston)	<p>DEA Aviation has operated from Gamston for a number of years and prior to the 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. This 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.</p>	Thank you for your feedback.

Stakeholder Group	Stakeholder Organisation/Name	Stage 2 Feedback Received	DSA Response (if required)
	Sherburn Aero Club	Are there any modifications to the airspace dimensions, airspace classifications or flight procedures described in the initial design option that you would suggest - NO	Thank you for your feedback.
	Derbyshire Soaring Club (BGA)	<p>General Comments on the Stage 1 &amp; 2 consultation and Initial Design Option</p> <p>The re-awakening of a previously dormant ACP by the issue of a stage 1 &amp; 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 &amp; 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.</p> <p>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.</p> <p>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.</p>	<p>A follow up meeting was arranged between DSA and the BGA to discuss the feedback provided for Stages 1 and 2. More information is available in <a href="#">Section 4.4</a> and Appendix A of the <a href="#">Stage 1 Submission Document</a>.</p> <p>Thank you for your feedback. As a result of stakeholder feedback such as yours we have created additional options which you can find in <a href="#">Sections 4.4 - 4.8</a> of this document. This includes an in-depth consideration (Option 0) of operating commercial flights from DSA in Class G (uncontrolled) airspace and an Option 3 that enhances the uses of PBN to reduce the volume of controlled airspace required.</p> <p>We look forward to receiving feedback from you on this option so we can further refine in Stage 3.</p>

Stakeholder Group	Stakeholder Organisation/Name	Stage 2 Feedback Received	DSA Response (if required)
		<p>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.</p>	
	<p>Yorkshire Aero Club</p>	<p>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.</p> <p>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?</p>	<p>Thank you for your feedback. We called the airfield who advised they are "licensed with an ATZ". This has been confirmed by CAA ATM &amp; Aerodromes.</p> <p>A new Letter of Agreement will be required between Sandtoft and DSA. Please note that due to CAP3096, the terms and conditions of all previous LoAs should not be assumed going forwards.</p>
	<p>Burn Gliding Club (BGA)</p>	<p>I am writing to you to confirm our interest in the ACP proposal as DSA directly affects the operations of Burn Gliding Club Ltd.</p> <p>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.</p> <p>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 benefited 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.</p> <p>Please confirm you have received this response on behalf of Burn Gliding Club and that we will be consulted on all future stages.</p> <p>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- previously chaired by DSA but new chaired by Leeds Bradford ATC.</p> <p>Oh, before I forget... The next LAIT meeting chaired by LBA is scheduled for next Tuesday 20th January 2026.</p>	<p>Thank you for your feedback. We passed information on the RAUWG (Regional Airspace Users Working Group) meetings held at RAF Leeming and the LAIT (Local Airspace Infringement Team) meetings to the pending ANSP at DSA.</p> <p>We fully expect that a suite of LOAs will be required to support the eventual operations from DSA. Please note that due to CAP3096, the terms and conditions of all previous LoAs should not be assumed going forwards.</p> <p>We have created additional options which you can find in <a href="#">Sections 4.4 - 4.8</a> of this document. This includes an in-depth consideration (Option O) of operating commercial flights from DSA in Class G (uncontrolled) airspace and Options with a smaller volume of controlled airspace. In particular, Option 3 was designed to mitigate the impact of the previous Upton Corridor on gliding operations.</p> <p>We look forward to receiving feedback from you on the options taken into Stage 3 so we can further refine.</p>

Stakeholder Group	Stakeholder Organisation/Name	Stage 2 Feedback Received	DSA Response (if required)
		<p>It's worth pointing out that the presence of DSA class D seemed to exacerbate 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.</p> <p>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.</p>	
	Microflight Aviation	<p>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.</p> <p>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.</p> <p>Thank you for the information you have submitted for us to consider.</p>	Thank you for your feedback.
Community Stakeholders	Airport Consultative Committee	<p>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.</p> <p>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.</p>	Thank you for your feedback.
	Save DSA	<p>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.</p>	Thank you for your feedback.
	South Yorkshire Chambers of Commerce	<p>We are writing jointly on behalf of Barnsley &amp; 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.</p>	Thank you for your feedback.

Stakeholder Group	Stakeholder Organisation/Name	Stage 2 Feedback Received	DSA Response (if required)
		<p>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.</p> <ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <li>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.</li> <li>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:</li> </ol>	

Stakeholder Group	Stakeholder Organisation/Name	Stage 2 Feedback Received	DSA Response (if required)
		<ul style="list-style-type: none"> <li>• Our support for the reinstatement of DSA’s controlled airspace in line with the design principles proposed.</li> <li>• Our desire to see the airspace reinstated at pace to accelerate the delivery of commercial and economic benefits alike.</li> <li>• Our expectation that this process will enable DSA to reopen safely for freight in 2027 and passenger services in 2028.</li> </ul> <p>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.</p>	
Environmental Organisations/Groups	Historic England	Thank you for your email. Historic England has no comments to make.	Thank you for your feedback.
	Natural England	<p>THE CONSERVATION OF HABITATS AND SPECIES REGULATIONS 2017 (AS AMENDED)</p> <p>Internationally Designated Sites</p> <p>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’).</p> <p>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:</p> <ul style="list-style-type: none"> <li>- Potential noise and visual disturbance to SPA birds using Thorne and Hatfield Moors SPA.</li> <li>- Potential air quality impacts associated with the proposals to Thorne and Hatfield Moors SPA and Hatfield Moors SAC.</li> </ul> <p>WILDLIFE AND COUNTRYSIDE ACT 1981 (AS AMENDED)</p> <p>Sites of Special Scientific Interest (SSSI)</p>	<p>Thank you for your comprehensive feedback.</p> <p>We appreciate that this Airspace Change Proposal (ACP) will require us to provide relevant information to the Civil Aviation Authority (in their role as the Competent Authority to the ACP process) to inform an Appropriate Assessment (AA) which they will then have to complete. In undertaking this AA, they have a duty to consult with Natural England. This will cover all internationally protected sites that could be affected. We note the points made around noise, visual and AQ impacts and all these will be considered.</p> <p>Furthermore, impacts on other biodiversity features, including SSSIs, will be considered as part of information provided to inform a Strategic Environmental Assessment (SEA) that will accompany the ACP (which is defined as a plan or programme in SEA terms). In developing this, consideration will be made to operating approaches and mitigation so as to reduce any identified adverse effects.</p>

Stakeholder Group	Stakeholder Organisation/Name	Stage 2 Feedback Received	DSA Response (if required)
		<p>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.</p> <p>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.</p>	<p>Please see our <a href="#">Stage 2B document</a> (Initial Options Appraisal) for more detail.</p>
	Yorkshire Environment Agency	<p>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.</p>	<p>Thank you for your feedback.</p>
	Yorkshire Wildlife Trust	<p>Thank you for consulting Yorkshire Wildlife Trust (YWT) on this consultation for the reopening of Doncaster Sheffield Airport.</p> <p>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.</p> <p>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.</p> <p>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</p>	<p>Thank you for your comprehensive feedback.</p> <p>We appreciate that this Airspace Change Proposal (ACP) will require us to provide relevant information to the Civil Aviation Authority (in their role as the Competent Authority to the ACP process) to inform an Appropriate Assessment (AA) which they will then have to complete. In undertaking this AA, they have a duty to consult with Natural England. This will cover all internationally protected sites that could be affected. We note the points made around noise, light and AQ impacts and all these will be considered.</p> <p>Furthermore, impacts on other biodiversity features, including SSSIs, will be considered as part of information provided to inform a Strategic Environmental Assessment (SEA) that will accompany the ACP (which is defined as a plan or programme in SEA terms). In developing this, consideration will be made to operating approaches and mitigation so as to reduce any identified adverse effects.</p>

Stakeholder Group	Stakeholder Organisation/Name	Stage 2 Feedback Received	DSA Response (if required)
		<p>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.</p> <p>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:</p> <ul style="list-style-type: none"> <li>• Any limit on physical airport capacity.</li> <li>• The number of flights permitted by planning decisions.</li> <li>• Planning conditions such as noise preferential routes.</li> <li>• Any limit on carbon emissions in planning conditions." (pg. 9, (Pg. 7, Air Navigation Guidance 2017)</li> </ul> <p>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.</p> <p>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 years<sup>1</sup>, 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 &amp; Surveys, April 2019. Found at: Advice-Note.pdf 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</p>	<p>Please see our <a href="#">Stage 2B document</a> (Initial Options Appraisal) for more detail.</p>

Stakeholder Group	Stakeholder Organisation/Name	Stage 2 Feedback Received	DSA Response (if required)
		<p>a robust impact assessment. The grassland habitats on and around the airport are also of ecological interest, particularly the acid grassland communities present.</p> <p>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<sup>2</sup>, 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 Framework<sup>3</sup>, 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.</p> <p>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.</p>	

*Table 9: Stage 2 Stakeholder Feedback*

## 4.5 Outcome of Stakeholder Feedback

- 4.5.1 The feedback received helped DSA to properly understand any concerns and take them into account both in terms of further articulating the baseline scenario and developing additional options. Stakeholder feedback also helped to provide a more informed design principle evaluation and initial options appraisal.
- 4.5.2 CAP1616f states that the change sponsor must demonstrate what they have heard and how this feedback has, or has not, informed the development of the baseline scenarios and design options.
- 4.5.3 In March 2026 we provided our stakeholders with an overview of the feedback received and advised that DSA had:
- Procured radar data from NATS to expand on the description of the current day (baseline) scenario and shared our updated baseline with them
  - Considered an option (Option 0) where DSA operate commercial flights in Class G (uncontrolled) airspace
  - Developed an option (Option 2) with modifications to the design we shared
  - Developed an option (option 3) with a different procedure (route) design, with an associated reduction in the volume of Controlled Airspace
  - Shared all options with stakeholders
- 4.5.4 Appendix A presents Options 1-3 in a format to aid comparison to each other.
- 4.5.5 The overview provided to stakeholders in March 2026 is available in Appendix A to the Stage 1 Submission Document, Stakeholder Correspondence and Material on the CAA Portal, [here](#).

## 4.6 Option 0 – No Controlled Airspace

- 4.6.1 This Option was called Option 'Zero' because Option 1 was the first option proposed and only Options 1-3 are viable options that address the statement of need<sup>14</sup>.
- 4.6.2 This option was proposed by some stakeholders (BGA, GAA, LBA, LAA and DEA Aviation (Gamston)) and considers DSA opening and operating commercial passenger operations without any controlled airspace protection. As a minimum DSA would need an Aerodrome Traffic Zone (ATZ) which would retain the background airspace classification (Class G), Instrument Approaches and an appropriate level of Air Traffic Service to be provided.
- 4.6.3 Option 0 is discounted ahead of the Design Principle Evaluation as it doesn't meet the objective of the proposed change, as set out in the Statement of Need, which is to re-establish controlled airspace, Standard Instrument Departures (SIDs), Standard Terminal Arrival Routes (STARs), and Instrument Approach Procedures (IAPs) serving Doncaster Sheffield Airport (DSA).
- 4.6.4 Whilst feedback from █████ confirmed that "Controlled airspace is essential to ensure safe and efficient passenger operations", some of our stakeholders felt strongly that DSA should not pursue the establishment of, nor requires, any controlled airspace. The following section provides justification for the requirement for CAS protection for DSA commercial operations.

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<sup>14</sup> CAP1616f 3.15

## 4.7 The Case for Controlled Airspace

4.7.1 This section considers only the justification for the establishment of Controlled Airspace at DSA, not the justification for the associated size or classification of the CAS.

4.7.2 There are a range of international and UK CAA policies, processes and guidance surrounding the establishment of controlled airspace and the provision of Air Traffic Services (ATS). Those considered in this section are:

- SARG Policy 126: 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
- CAP2304: Applications for instrument approach procedures to aerodromes without Approach Control and/or with a non-instrument runway
- SARG Policy 127: Policy Statement for the Classification of UK Airspace
- Air Navigation Order
- CAP 774: UK Flight Information Services
- CAP744: Air Traffic Controllers – Licensing
- CAP493 Manual of Air Traffic Services
- CAP1711 Airspace Modernisation Strategy 2023-1040

4.7.3 This makes for a rather confusing regulatory landscape, but this section aims to summarise the various policies, processes and guidance which supports DSA's need for CAS. Note that the justification for the establishment of CAS at DSA is not predicated on reaching any specific level of forecast Air Transport Movements (ATMs,) but is to enable the safe and efficient operation of scheduled commercial air transport within a busy and complex section of UK airspace, close to other large commercial air transport airports and significant general aviation activity<sup>15</sup>, as demonstrated in the description of the current day scenario in the [Stage 1 Design Principle submission document](#).

### Controlled Airspace

4.7.4 Controlled Airspace is airspace of defined dimensions within which Air Traffic Control (ATC) service is provided in accordance with the airspace classification. Its purpose is to create a known air traffic environment to achieve the objectives of the ATC service to prevent collisions between aircraft and to expedite and maintain an orderly flow of traffic<sup>16</sup>.

4.7.5 Air Navigation Service Providers (ANSPs) should seek to review and examine particular elements or procedures of a specific operation and their functional system. The purpose being to ensure that the ANSP can provide its services in a safe, efficient, continuous and sustainable manner, consistent with any foreseen level of overall demand for a given airspace<sup>17</sup>.

4.7.6 The review should include the airspace design and volume, associated ATS routes and/or SIDs and STARs and the associated ATS arrangements, to ensure that this airspace satisfies changing safety, operational and environmental conditions and requirements and meets the following principle:

<sup>15</sup> [Statement of Need Version 2.0](#)

<sup>16</sup> CAA Policy for the Design Controlled Airspace Structures

<sup>17</sup> CAA Policy for the Design Controlled Airspace Structures

*“Sponsors must seek to ensure the amount of controlled airspace is the minimum required to maintain a high standard of air safety and, subject to overriding national security or defence requirements, that the needs of all airspace users is reflected on an equitable basis”.*

- 4.7.7 ICAO Annex 11 states that the provision of air traffic services shall be determined by considering the types and density of air traffic, meteorological conditions and any other factors. It states that due to the number of elements involved, it has not been possible to develop specific data to determine the need for air traffic services in a given area or at a given location.

There is therefore no threshold set for a volume of ATMs that warrants CAS, it is based on the mixture (e.g. numbers, types, speeds etc) of air traffic operating in the airspace. For example, 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 classification and designation of ATS airspaces follows a determination of the need for air traffic services. When it has been determined that ATS will be provided in particular portions of the airspace or at particular aerodromes, then those portions of the airspace or those aerodromes shall be designated in relation to the air traffic services that are to be provided<sup>18</sup>.*

- 4.7.8 The ANSP therefore needs to first determine which air traffic services are to be provided and, where applicable, 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 the airport requirements for Standard Instrument Departures (SIDs) and/or Instrument Approach Procedures (IAPs) and the appropriate service provision to ensure that the risk of airborne conflict remains As Low As Reasonably Practicable (ALARP).

### **Air Traffic Service**

- 4.7.9 The Air Navigation Order Article 183 requires that in the case of an aerodrome (other than a Government aerodrome) for which there is equipment providing, aid for holding, aid for let-down or aid for an approach to landing by radio or radar, is promulgated, an Approach Control Service is to be provided. An Approach Control Service can only be provided by Air Traffic Control Officers (ATCOs), as opposed to Flight Information Service Officer (FISOs).
- 4.7.10 The UK permits an Approach Control Service to be provided outside CAS<sup>19</sup>, and it also permits RNP Approaches outside CAS, without an Approach Control Service within CAP2304 but there is no provision in that document for Instrument Landing System (ILS) approaches in Class G airspace, without an approach control service being provided<sup>20</sup>.
- 4.7.11 The description of the current day scenario surrounding DSA illustrates a frequent prevalence of other airspace users in the area of operation that DSA will provide an Air Traffic Service. This supports the requirement for the provision of a surveillance-based Approach Control Service to future DSA operators.
- 4.7.12 DSA proposes both RNP and ILS<sup>21</sup> approaches and their air traffic controllers will have [Aerodrome Control Instrument \(ADI\) Approach Control Surveillance \(APS\) ratings](#).
- 4.7.13 UK regulations currently allow Approach Control units in Class G airspace to provide UK Flight Information Services via a Procedural Service, Deconfliction Service, Traffic Service or Basic Service along with an Alerting Service. A Procedural, Traffic and Deconfliction Service can only be provided by ATCOs and provision of a Traffic or Deconfliction service requires ATCOs to have an Approach Control Surveillance

<sup>18</sup> CAA Policy for the Design Controlled Airspace Structures

<sup>19</sup> Note paras 4.17.13 and 4.7.14

<sup>20</sup> CAP2304 Page 7 states that the document provides policy, guidance and AMC6 to assist those aerodromes to apply for the implementation of a Required Navigation Performance (RNP) approach

<sup>21</sup> CAT I for runway 02 and CAT II/III for runway 20

(APS) rating. CAP493 could be construed to declare these services as an Approach Control Service<sup>22</sup> as it falls within the relevant section in the document, but the description of the services provided in Class G airspace does not use the word 'control' and when ATCOs provide UK FIS they do not declare to be providing an Approach Control Service. CAP1711<sup>23</sup> says that the UK intentions are for 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".

- 4.7.14 CAP744 defines an Approach Control Service as an Air Traffic Control service for arriving, departing or transiting controlled flights. A controlled flight is any flight which is subject to an air traffic control clearance. An Air Traffic Control Service can only be provided within controlled airspace. These are therefore Approach Control Units in Class G airspace, but they are not providing an Approach Control Service.
- 4.7.15 It is therefore debatable as to whether the provision of UK FIS constitutes an Approach Control Service, as required by the Air Navigation Order Article 183. With regards to a Deconfliction Service, the pilot only receives traffic information accompanied with a heading and/or level instructions aimed at achieving a planned deconfliction minima against all "observed" aircraft and the avoidance of other traffic is ultimately the pilot's responsibility.
- 4.7.16 ICAO Annex 11 makes a clear distinction between an air traffic control service and a flight information service. An Approach Control Service is an Air Traffic Control Service (as per CAP744) and those portions of the airspace where it is determined that air traffic control services will be provided to IFR flights shall be designated as control areas or control zones. A flight information service is provided for the purpose of giving "advice". ICAO flight information services does not recognise the provision of an Approach Control Service in uncontrolled airspace.
- 4.7.17 CAP1711a<sup>24</sup> states the UK's intention is to adopt ICAO flight Information services<sup>25</sup>. It goes on to state that *"The CAA does not automatically equate the adoption of ICAO FIS with the need for every air navigation service provider currently providing UK Flight Information Services Deconfliction Services and Procedural Service to IFR traffic in Class G airspace to require a control zone (CTR). The expectation as a starting assumption is that air navigation service providers will manage their traffic in Class G using ICAO FIS. Any perceived need for the provision of air traffic control service and the associated notification of a CTR will require an airspace change proposal in accordance with CAP 1616"*.
- 4.7.18 CAP1711<sup>26</sup> states that the UK intentions are for 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"*.
- 4.7.19 Furthermore, Annex A of the CAA Policy for the Design Controlled Airspace Structures is now aligned with ICAO, also stating "those portions of the airspace where it is determined that air traffic control (ATC) service will be provided to Instrument Flight Rules (IFR) flights shall be designated as control areas (CTA) or control zones (CTR)".
- 4.7.20 DSA, through robust safety led assessment of risk and requirements, seeks to ensure the risk of airborne conflict in the areas where an ATS will be provided is ALARP, by providing an Air Traffic Control Service, which, to unequivocally comply with current and future regulations, will be required to be provided within controlled airspace.

<sup>22</sup> CAP493 Section 3: Chapter 1: Approach Control

<sup>23</sup> Chapter 5 Use case 2: Air traffic service provision

<sup>24</sup> Chapter 3 Element 4

<sup>25</sup> ICAO FIS does not recognise Basic Service, Traffic Service, Deconfliction Service or Procedural Service. The provision of separation for IFR movements requires an air traffic control service inside controlled airspace.

<sup>26</sup> Chapter 5 Use case 2: Air traffic service provision

## Standard Instrument Departures

4.7.21 DSA are also proposing SIDs for a number of reasons:

### 1. Statement of Need

The Statement of Need contains an objective of re-establishing SIDs. From a safety and operational standpoint, reintroducing controlled airspace and associated procedures will provide essential protection and systemisation for commercial traffic, at critical phases of flight and ensure safe interactions with other airspace users.

### 2. Enhanced Safety

CAA's Post Implementation Review (PIR) of the original implementation of Controlled Airspace at Robin Hood Airport Doncaster Sheffield (RHADS), June 2017, explains that prior to the establishment of CAS at the airport, there was a known issue with commercial air transport operating in the then Class G airspace coming into conflict with unknown traffic, particularly in critical areas of flight perceived as high risk such as departure (and arrival). Specifically, the original CAS proposal sought to enhance safety by protecting commercial air transport in the critical departure and arrival phases of flight through containment of procedures within controlled airspace. It also states that the introduction of SIDs with connectivity to the airways structure undoubtedly reduces controller workload, planning complexity for pilots and delivers operational and environmental benefits to airports users to and from the airport.

### 3. Noise and Environmental Performance

DSA's Planning Permission requires Noise Preferential Routings (NPRs) for departures and radar tracking to assist in monitoring adherence to the NPR. The NPRs were arrived at through consultation in 2018 and one of our design principles is that the airspace change proposal should not modify DSA's previous NPRs unless required for safety or airspace integration purposes. The NPR track keeping would be very challenging without associated PBN SIDs.

The introduction of SIDs allows continuous climb within managed routes that are preferred for minimising disruption to the local community and the realisation of environmental benefits. These benefits are further realised by comparison with the likely increase in the fuel burn, CO<sub>2</sub> emissions and noise that would be incurred whilst providing the highest level of service (Deconfliction Service) outlined in CAP 774. The deconfliction service requirements are for an ATCO providing the service to seek to achieve 5 nm laterally or 3000ft vertically from uncoordinated (unknown) traffic. In the areas around DSA the traffic density is such that there are multiple opportunities for large commercial aircraft during arrival and departure, to come into conflict (less than the deconfliction minima) with unknown traffic. This requires the ATCO to use vectoring to avoid the unknown traffic which is likely to result in increased track miles to the IAP or enroute fix and subsequently increases noise, fuel burn and CO<sub>2</sub> emissions.

### 4. Existing and Future MTMA Integration

DSA's air traffic will need to integrate with the existing network airspace design and, where possible, the emerging MTMA network design. The latter is striving to achieve a systemised environment allowing minimal ATCO intervention, which will be achieved through the provision of closely spaced PBN routes. The ability to procedurally deconflict DSA's arrivals and departures routes from each other together with those of Leeds Bradford Airport and Manchester Airport is essential to enable the most efficient airspace integration throughput, without one airport imposing delays on another due to non-separated routings.

4.7.22 Current UK policy<sup>27</sup> is that a SID provides a specified IFR departure procedure that should remain wholly within controlled airspace and that permit connectivity with the en-route ATS route system.

**Safety/Airprox history**

4.7.23 As explained already in paragraph 4.7.3 the justification for the establishment of CAS at DSA is not predicated on reaching any specific level of forecast Air Transport Movements (ATMs) but is to enable the safe and efficient operation of scheduled commercial air transport within a busy and complex section of UK airspace, close to other large commercial air transport airports and significant general aviation activity.

4.7.24 In July 2008, Robin Hood Airport Doncaster Sheffield (RHADS) implemented controlled airspace after an airspace change to “to introduce Control Zones (CTRs) and Control Areas (CTAs) to maintain a high standard of safety and, where possible, enhance flight safety, improve the operations of airspace users to and from the airport, reduce air traffic controller workload and interactions, and minimise the environmental impacts of these operations upon local communities.”

4.7.25 In 2017 the CAA published their Post Implementation Review (PIR) of the ACP<sup>28</sup>.

4.7.26 The PIR states that “There was a known issue with commercial air transport operating in the then Class G airspace coming into conflict with unknown traffic, particularly in areas of flight perceived as high risk such as climb-out and arrival. A significant factor in the justification for the CTRs in particular were the numbers of Airprox<sup>29</sup> involving CAT in the vicinity of the airfield since commercial operations had begun, including one Category B assessment.”

4.7.27 The CAA’s PIR report presented some data<sup>30</sup> on the number of filed Airprox reports in the vicinity of the airport for the 3 years prior to the controlled airspace implementation to the end of 2014. This is presented in Figure 6.

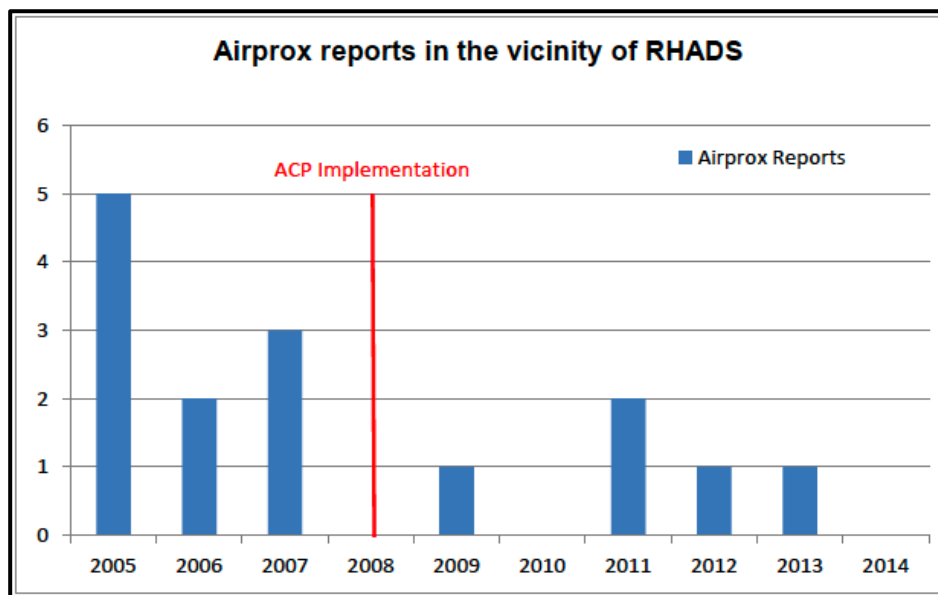


Figure 6: Table from CAA’s RHADS PIR, showing Airprox trend v CAS implementation

<sup>27</sup> CAA Policy for the Design Controlled Airspace Structures

<sup>28</sup> <https://www.caa.co.uk/media/v15pp0jn/20170512-doncaster-pir.pdf>

<sup>29</sup> “A situation in which, in the opinion of a pilot or air traffic services personnel, the distance between aircraft as well as their relative positions and speed have been such that the safety of the aircraft involved may have been compromised.”

<sup>30</sup> Figure 1 of the PIR

- 4.7.28 The PIR also presented data on RHADS Annual Passenger Movements across a similar period<sup>31</sup> and the PIR also states “*in the opinion of the CAA, 1mppa<sup>32</sup> is considered a suitable benchmark for the looking at the possible requirement for CAS at RHADS*”.
- 4.7.29 However, there is no data presented by the CAA to support this opinion. Whilst the PIR was published nearly 8 years ago and noting that, as set out above, CAA policy has evolved since then, there is no CAA policy statement surrounding a specific threshold of annual passenger movements that justifies a requirement for controlled airspace.
- 4.7.30 CAA policy is aligned with ICAO in that Air Navigation Service Providers (ANSPs) should seek to review and examine particular elements or procedures of a specific operation and their functional system. The purpose being to ensure that the ANSP can provide its services in a safe, efficient, continuous and sustainable manner, consistent with any foreseen level of overall demand for a given airspace. The word ‘demand’ in this context is not associated with the demand by one particular airspace user.
- 4.7.31 Notwithstanding this, the 1 mppa figure has been highlighted to us by some stakeholders in support of their arguments that DSA cannot justify controlled airspace. CDC have therefore expanded on the CAA’s PIR analysis from 2005 and extended it through to the end of 2022 when DSA ceased operations. The analysis considers all Airprox filed within 10nm of the RHADS CTA lateral boundary that involved a Doncaster flight.
- 4.7.32 Figure 7 shows the number of filed Airprox involving an RHADS movement from 2005 to 2022<sup>33</sup> mapped against the number of passengers operating from the airport.

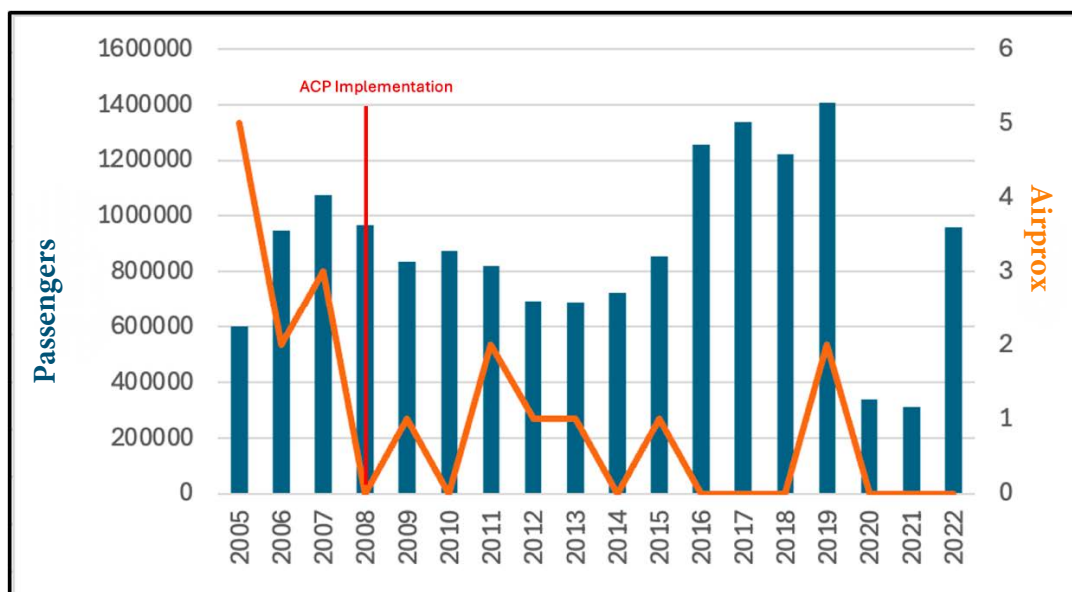


Figure 7: RHADS Airprox trend v Passenger Numbers

- 4.7.33 The extended analysis showed there were more filed Airprox involving RHADS movements in the 3 years prior to establishing controlled airspace than in the following 15 years. In 2005-2007 there was one airprox per 262,217 RHADS passenger movements. In 2008-2022 there was one airprox per 1,661,495 RHADS passenger movements.
- 4.7.34 That analysis covered the trend for RHADS movements but did not consider any Airprox trends for the wider airspace user community. Figure 8 therefore presents the number of Airprox reports filed each

<sup>31</sup> 2005-2016

<sup>32</sup> Million passengers per annum

<sup>33</sup> There was one airprox in 2022 which involved an RHADS movement with an unknown object. This airprox was excluded from the analysis as controlled airspace could not be considered to be a mitigating or attributing factor.

year, in total, within 10nm of RHADS' previous controlled airspace boundary. This considers all Airprox, not just those involving RHADS movement and extends back to 2000, ahead of the opening of RHADS.

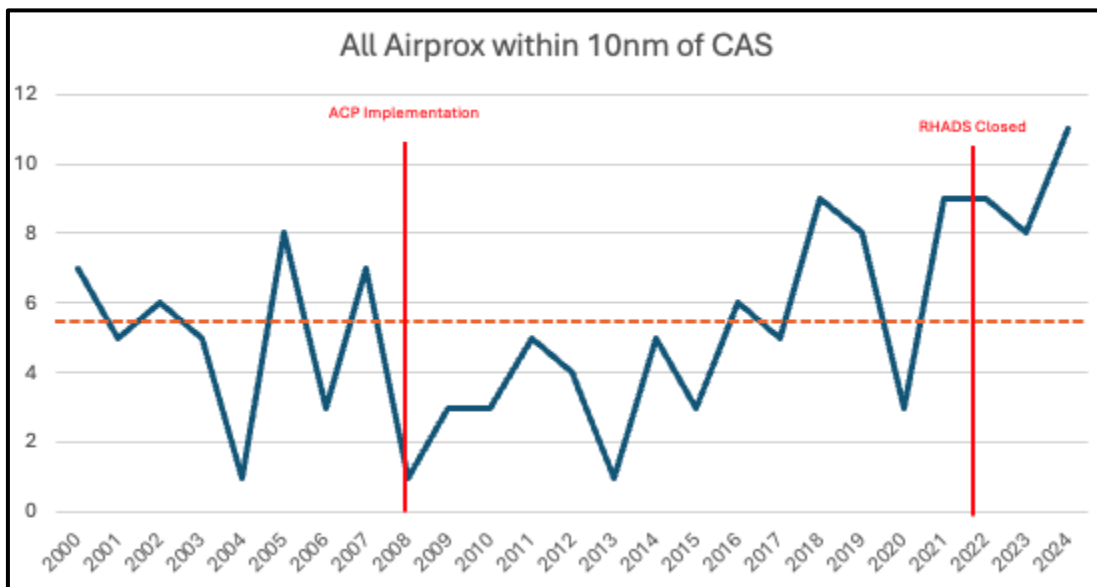


Figure 8: All Airprox trend within 10nm of CAS boundaries 2000-2024

4.7.35 In the case of the airspace surrounding DSA, there is clearly not a rationale that supports the case that there should be a threshold for passenger movements reached to justify a requirement for controlled airspace, nor is there evidence that the implementation of CAS had a negative impact on other airspace users which resulted in increased Airprox reports as a result of the implementation of the CAS. With the exception of 2020 (Covid), there has been an increase in the number of filed reports but this trend has continued since the closure of the CAS 2022<sup>34</sup>.

4.7.36 It is not only the safety of the commercial air traffic that is enhanced but also the safety of other airspace users that could otherwise legitimately operate in the same airspace volume (beyond an ATZ) with no transponder and without being in receipt of any air traffic service.

## 4.8 Option 2 – Refinement of Option 1 due stakeholder feedback or to align with CAA policy

4.8.1 Feedback from some stakeholders on Option 1 made it clear that DSA should try to reduce the volume and/or classification of controlled airspace to reduce the impact on other airspace users. In addition:

- Our airspace designers highlighted that the previous ROGAG SIDs were not contained within controlled airspace in accordance with CAA's latest controlled airspace containment policy<sup>35</sup>.
- The 2022 radar data did not show any flights following the RWY 20 left turn UPTON departure in the 12-month period. This SID previously existed as the right turn UPTON SID did not provide 5nm lateral separation against the 'Camphill Box' which is an airspace volume occasionally activate under LoA. However, in discussions with NATS and flyDSA a separate SID was not required as the very occasional affected flights could either depart on an Omni-Directional Departure or it may be possible to reduce the separation requirement below 5nm between the right turn SID and the Camphill Box.

<sup>34</sup> Data for 2025 not available at the time of writing.

<sup>35</sup> SARG Policy 126: For RNAV1 SIDs the nominal track should not be less than 2nm from the edge of controlled airspace on straight legs or 3nm on non-straight legs. Airspace change sponsors may present proposals for a controlled airspace design that results in lateral containment of IFPs less than this.

- NERL advised verbally that a more suitable SID termination point to slightly to the SW of UPTON could be preferable.
- NERL advised that the ROGAG SID could be shortened to a slightly earlier point within the network.

4.8.2 The refinements from Option 1 proposed at this stage, as illustrated in Figure 9 and Figure 10 are:

- The addition of an earlier FL60 point on the RWY02 UPTON SID to enable a reduction in the volume of controlled airspace to the north-west.
- A new SID termination point to the SW of UPTON for UPTON SIDs
- Remove of the RWY20 left turn UPTON SID
- Adjustment to the ROGAG SIDs to ensure at least 2nm containment from the edge of controlled airspace
- Revised CTA boundaries to the west of the CTR to reduce the overall volume together with a proposed reduction in classification from Class D to Class E+ for some CTAs.

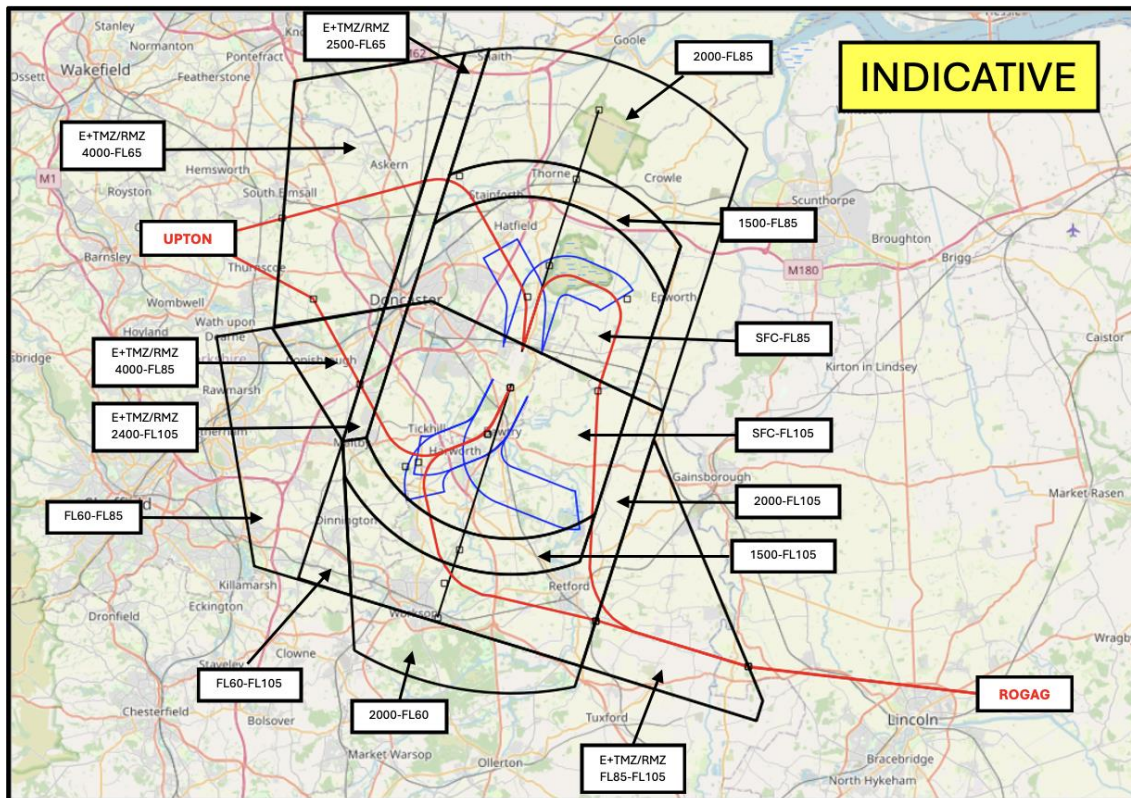


Figure 9: Option 2 (INDICATIVE)

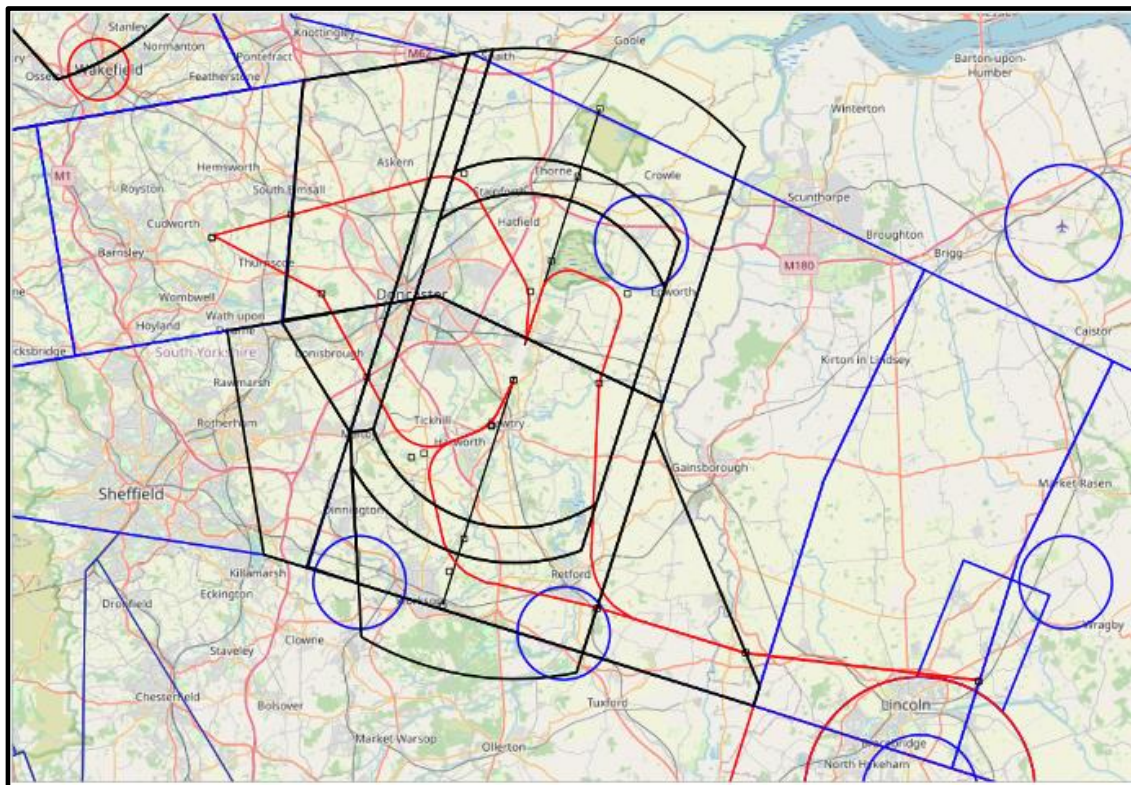


Figure 10: Option 2 (INDICATIVE)

- 4.8.3 Air traffic services would be provided by an air traffic control unit, delivering Tower and Approach Radar services consistent with the airport’s former operation. Recruitment for operational personnel is underway to support the re-establishment of these services.
- 4.8.4 ATC would vector all arrivals onto final approach, usually to the Instrument Landing System (ILS) or occasionally to the RNP Approach. Departures will follow RNAV1 SIDs unless vectored when beyond the NPR or if required for safety reasons. Omni-Directional Departures will exist for any aircraft unable to fly the RNAV1 SIDs.
- 4.8.5 Whilst this option has different controlled airspace dimensions and classifications compared to Option 1, we would expect the traffic patterns below 7,000ft to closely reflect those shown in Figure 4 and Figure 5 with some small differences above approximately 6000ft on the RWY 20 ROGAG and RWY 20/02 UPTON SIDs owing to their proposed adjustments.

### 4.9 Option 3 – Use of Radius-to-Fix to create less restrictive CAS structures and to aid future MTMA integration

- 4.9.1 Feedback from two stakeholders on Option 1 felt very strongly that a more radical solution should be investigated:

*“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”. (British Gliding Association)*

*“Create another, new design option that used modern PBN design techniques and modern aircraft performance that enable higher CAS bases. We’d like to see a radically different design so we can engage meaningfully”. (British Gliding Association)*

*“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”. (Leeds Bradford Airport)*

- 4.9.2 Three stakeholders also raised concerns that this ACP could either be delayed by, or cause a delay to ACP-2019-77:

*“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 NPRS 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 governments open letter on NATS prioritisation. However, through engagement with NATS NERL plc, we believe that there may be a more optimal solution which will meet DSA's design principles and reduce the scale of future change”.*

*“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 DP) and is inconsistent with the strategic intent of the Airspace Modernisation Strategy”. (Leeds Bradford Airport)*

*“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”. (Manchester Airport Group)*

- 4.9.3 As a result of this feedback, we created a completely new option.
- 4.9.4 The issues raised by the British Gliding Association and Leeds Bradford Airport to try and require less controlled airspace provided a design objective which aligned with design principles 2, 4 and 6.
- 4.9.5 The request to design an option that considered the impact of DSA's ACP on a future ACP that is in support of delivery of the CAA's Airspace Modernisation Strategy required more consideration.
- 4.9.6 The request is aligned with design principles 2 and 4 but the future MTMA airspace design is still at a formative stage with each sponsor still working through multiple design options. At the time of engagement, Leeds Bradford Airport was still in Stage 2 of the process with many different options depicted as design swathes, not centrelines.
- 4.9.7 Following review of material on the CAA's airspace change portal, the heatmaps produced for our current day scenario and conversation with NERL, it was clear that in both the existing and future MTMA designs, there is/will still be a flow of descending MTMA arrivals traffic from the east and across the north of DSA, with a departure flow to the east and across the south of DSA.
- 4.9.8 It was therefore determined that a DSA design which avoided SID positioning to the north of the airport would likely be welcomed by both an existing and future en-route network.

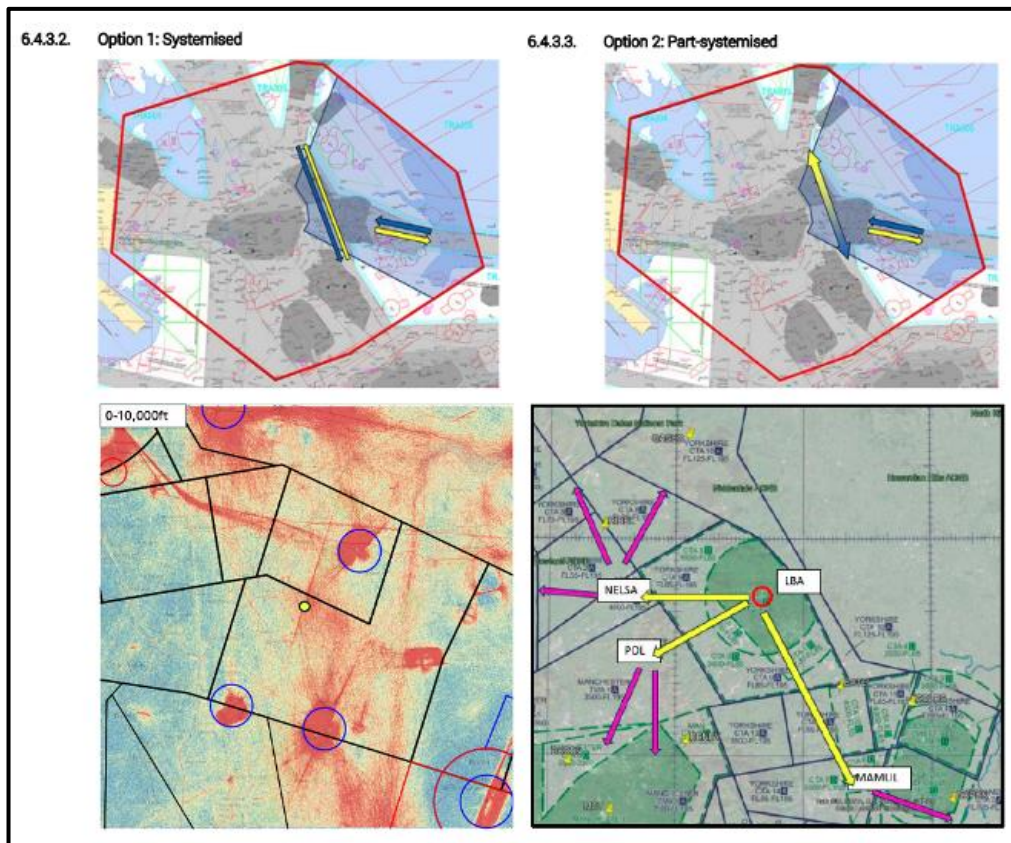


Figure 11: Relevant information available from CAA's airspace change portal and our 2022 heatmaps

- 4.9.9 The use of RNP-AR was mentioned by Leeds Bradford Airport as a solution to further reduce the volume of Controlled Airspace. RNP-AR can enable curved approaches to a very short (c.3nm) final approach. These approaches would only result in less controlled airspace if all arrivals could be guaranteed to fly such an approach 100% of the time otherwise, alternative approaches would need to be available.
- 4.9.10 Regardless of issues with operator RNP-AR equipage and approvals, a controlled airspace design and associated ATC operation at DSA based purely on RNP-AR is not a practical solution. DSA will have a CAT III ILS which provides better minima than RNP-AR can deliver, aircraft will still need to be positioned for an ILS or RNP APCH and arrivals would frequently need to be vectored to avoid weather. The incorporation of RNP-AR procedure would therefore not result in less controlled airspace.
- 4.9.11 Option 3 as illustrated in Figure 12 and Figure 13 uses RNP with RF to, wherever possible:
  - Reduce the numbers of people affected by noise and overflight<sup>36</sup> and remain aligned with DSA's existing NPRs
  - Contain flight paths within the smallest amount of controlled airspace
  - Position departures to the south of DSA as much as technically possible to aid existing and future MTMA integration
  - Enhance systemisation for both DSA ATC and the surrounding MTMA network design

<sup>36</sup> This is based on qualitative judgment and cannot yet be confirmed.

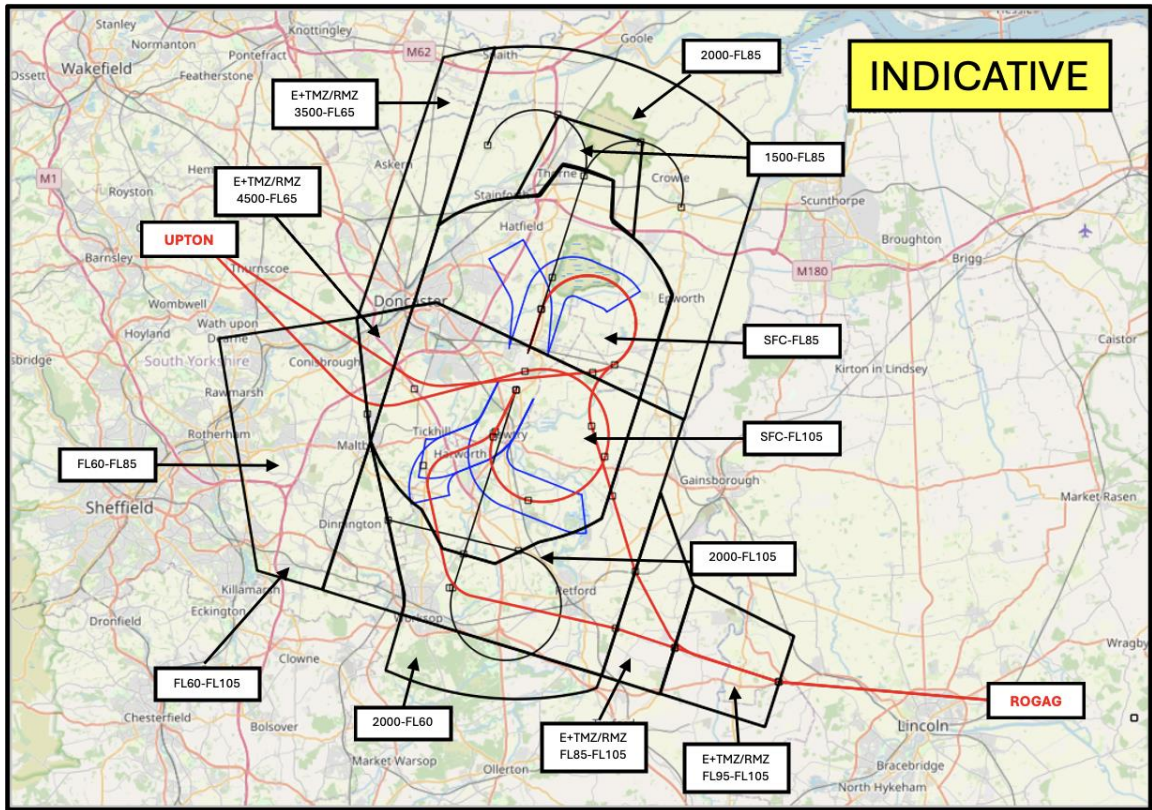


Figure 12: Option 3 (INDICATIVE)

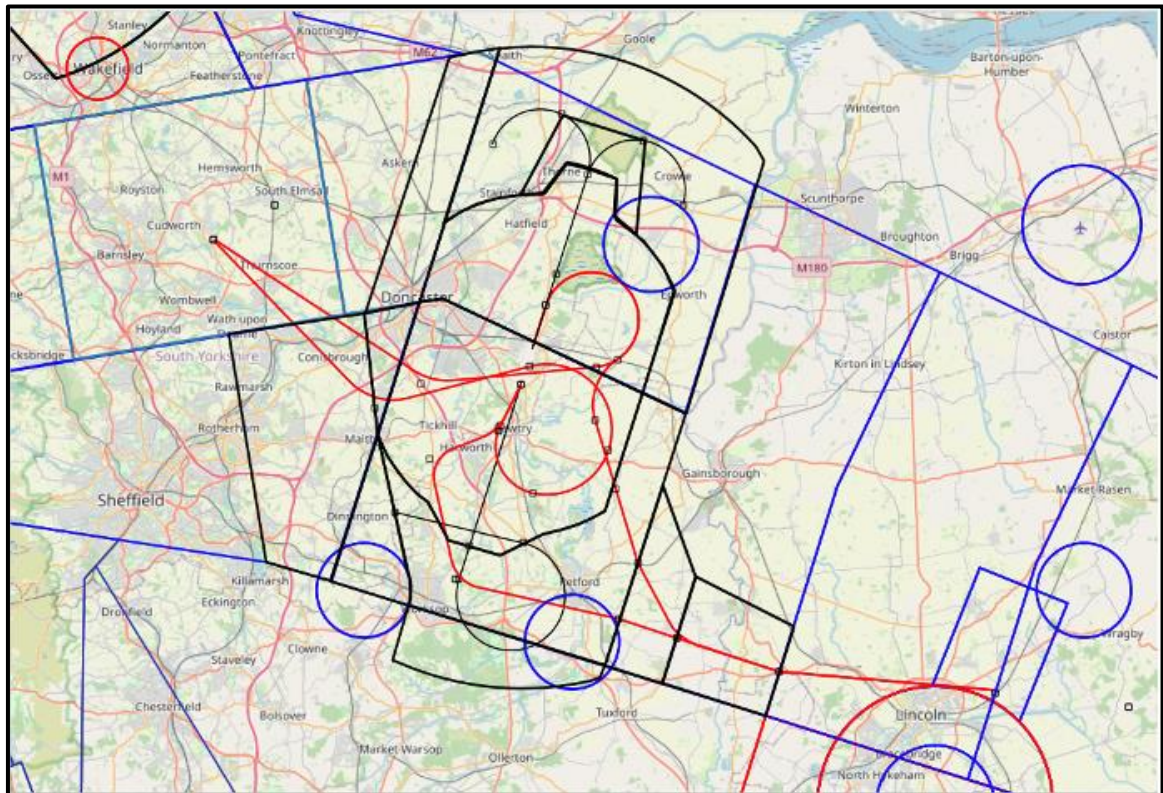


Figure 13: Option 3 (INDICATIVE)

- 4.9.12 Air traffic services would be provided by an air traffic control unit, delivering Tower and Approach Radar services consistent with the airport’s former operation. Recruitment for operational personnel is underway to support the re-establishment of these services.
- 4.9.13 ATC would commonly vector arrivals onto the PBN procedures which they could follow from c. FL60/5000ft round onto final approach, usually to the Instrument Landing System (ILS) or occasionally to the RNP Approach. Departures will follow RNP1 +RF SIDs unless vectored when beyond the NPR or if required for safety reasons. Omni-Directional Departures will exist for any aircraft unable to fly the RNP1 +RF SIDs either due to aircraft navigational capability or if unable to meet the climb gradients, some of which could be greater than 8%.
- 4.9.14 This option has different controlled airspace dimensions and classifications compared to Options 1 and 2 and a more systemised airspace design with arrivals following PBN procedures from a higher altitude. The use of RF provides a higher degree of concentration compared to the patters associated with Options 1 and 2.

### 4.10 Year 1 and Year 10 Forecasts

4.10.1 Table 10 provides CDC’s latest ATM forecasts for Year of Implementation (2028) and Year of Implementation + 10 years (2037).

Year	ATMs
2028	1,841
2037	12,329

*Table 10: ATM Forecast Yol & Yol+10*

## 5. DESIGN PRINCIPLE EVALUATION

### 5.1 Evaluation of the Future Baseline Against the Design Principles

5.1.1 We cannot evaluate the future baseline against the design principles because there is no future DSA operation to assess without a consented airspace change proposal. The future baseline could neither meet, partially meet or not meet the principles.

5.1.2 Table 11 explains why it is impractical to assess the future baseline scenario against our design principles.

Design Principle	Future Baseline
The airspace change proposal must maintain a high standard of safety and should seek to enhance current levels of safety.	CDC cannot assess the safety performance of a future DSA operation that doesn't exist nor are CDC in a position to assess the safety performance of other airspace users' operations in the region.
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.	CDC cannot assess the performance of a future DSA operation that doesn't exist against legislation, the CAA's airspace modernisation strategy or Secretary of State and CAA's policy and guidance.
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.	There would be no impact on the Government's key environmental objectives. It could neither meet, partially meet or not meet the principle.
The airspace change proposal should consider the impacts on air navigation service providers and other aviation stakeholders such as nearby airport operators and other airspace users.	There is no future DSA airspace on which to assess the impact on air navigation service providers and other aviation stakeholders such as nearby airport operators and other airspace users.
The airspace change proposal should not modify DSA's previous NPRs unless required for safety or airspace integration purposes.	Arguably the NPRs would still exist on paper in a future baseline but there would be no aircraft operating on them.
Any airspace structure(s) should be of the minimum size and lowest classification needed to achieve its aims to minimise disruption to, and maximise integration with, other airspace users.	There are no future DSA airspace structures to assess without a consented airspace change proposal.

Table 11: Future baseline vs DPE

5.1.3 Whilst we cannot assess the future baselines against the design principles, we will of course include the future baseline in the Initial Options Appraisal for comparison of the continued options against them.

### 5.2 DPE Methodology

5.2.1 Table 12 sets out the DPE methodology used. Options that don't meet one or more mandatory design principles will be discontinued at this stage.

DP#	Design Principle	DP Component	APPROACH TO EVALUATION	MEETS	PARTIALLY MEETS	DOES NOT MEET
DP1	The airspace change proposal must maintain a high standard of safety and should seek to enhance current levels of safety.	Safety of traffic inside CAS	It is not possible to understand whether the option <i>enhances</i> the current levels of safety for an operation that doesn't currently exist. In terms of <i>maintaining</i> a high standard of safety, this assessment considers whether the option has any characteristics that could result in an intolerable safety risk materialising inside CAS.	No safety risks identified at this time that are considered to be intolerable.	Issues identified that will require further safety assurances which seem achievable at this stage	Issues identified that would be unlikely to be able to be mitigated
		Safety of traffic outside CAS	This assessment considers whether the option has any characteristics that could result in an intolerable safety risk materialising <i>outside</i> CAS.	No safety risks identified at this time that are considered to be intolerable.	Issues identified that will require further safety assurances which seem achievable at this stage	Issues identified that would be unlikely to be able to be mitigated
		OVERALL DP EVALUATION (Any mixture of Met, Partly met, not met = Partly met). If any assessment in this category is found to not maintain a high standard of safety, the evaluation overall becomes Not Met).				
DP2	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.	SARG Policy 126: Policy for the Design Controlled Airspace Structures	This assessment considers the extent to which the option ensures the amount of controlled airspace is the minimum required to maintain a high standard of air safety and, subject to overriding national security or defence requirements, that the needs of all airspace users is reflected on an equitable basis.	Option is considered to use the minimum volume of CAS required.	N/A	Option uses more CAS than is required.
		Policy for the Classification of Controlled Airspace	This assessment considers the extent to which the option proposes the least restrictive classification of airspace to secure the most efficient use of airspace consistent with the safe operation and expeditious flow of air traffic. In particular, CTA, including those in the vicinity of certain aerodromes where an ATC service is provided to aerodrome traffic but where airspace classes A to D cannot be justified, may be notified as Class E airspace	All CTA classifications lower than Class D	Some CTA classifications lower than Class D	No CTA classifications lower than Class D
		CAP1711 Airspace Modernisation Strategy Strategic objectives: – Maintaining and, where possible, improving the UK's high levels of aviation safety	This objective of the AMS is assessed in mandatory DP1. Within the DPE, to avoid repetition, we will not repeat the text, however we will include the red/amber/green overall outcome from the DP1 assessment so that it is included in the overall assessment of DP2.	See DP1	See DP1	See DP1

DP#	Design Principle	DP Component	APPROACH TO EVALUATION	MEETS	PARTIALLY MEETS	DOES NOT MEET
		CAP1711 Airspace Modernisation Strategy Strategic objectives: – Integration of diverse users – including needs of defence and security <sup>37</sup>	This assessment considers the extent to which the option satisfies the known requirements of commercial operators. (Note as we progress through the process there will be further phases of engagement/consultation with commercial operators to understand further their requirements)	The option is expected to meet the requirements of commercial operators	The option is expected to meet the requirements of operators however further mitigations may be required.	The option is not expected to meet the requirements of operators
			This assessment considers the extent to which the option satisfies the known requirements of the military and the interests of national security. (Note as we progress through the process there will be further phases of engagement/consultation with the military to understand further their requirements)	The option is not expected to affect defence and security objectives. Military operations within the vicinity of DSA are not expected to be impacted, or impacts have been identified that are expected to be mitigated.	The option is not expected to affect defence and security objectives. Military operations within the vicinity of DSA are expected to be impacted (not prohibitively). The option does not offer the opportunity to minimise impacts as much as possible.	The option is expected to affect defence and security objectives and / or is expected to have prohibitive impacts on the military.
			This assessment considers the extent to which the option satisfies the known requirements of General Aviation airspace users. (Note as we progress through the process there will be further phases of engagement/consultation with General Aviation stakeholders to understand further their requirements). In particular, this assessment considers the extent to which the option meets CAA's Future structure of airspace vision as set out in Chapter 5 of CAP1711. This vision includes: - Increased use of Class E with a TMZ in other areas to enable air traffic control provision to IFR while minimising impact to VFR. - Class E airspace will normally be co-located with a TMZ to enable the additional safety net of a recognised air traffic environment where cooperative surveillance systems may be used in the management of such airspace. - Class E is to be notified where a recognised air traffic environment is necessary to support low complexity and/or low density IFR operations.	Option maximises use of Class E airspace co-located with TMZ	Option proposes some use of Class E airspace co-located with TMZ	Option has no use of Class E airspace co-located with TMZ

<sup>37</sup> CAP1711 also refers to new / rapidly developing airspace users. There is currently little regulatory guidance around the incorporation of new / rapidly developing airspace users such as such as remotely piloted aircraft systems, advanced air mobility, spacecraft, and high altitude platform systems. For the purposes of this assessment, we have assumed that minimising the amount of CAS would benefit these users and therefore this is assessed as part of the assessment of SARG Policy 126: Policy for the Design Controlled Airspace Structures shown above. (Note as we progress through the process there will be further phases of engagement/consultation with new / rapidly developing users to understand further their requirements)

DP#	Design Principle	DP Component	APPROACH TO EVALUATION	MEETS	PARTIALLY MEETS	DOES NOT MEET
			- Class E may be notified for certain airways (or portions thereof), or for CTA in the vicinity of certain aerodromes where an air traffic control service is provided to aerodrome traffic but where airspace Classes A to D cannot be justified.			
		CAP1711 Airspace Modernisation Strategy Strategic objectives: – Simplification – reducing complexity and improving efficiency	This assessment considers how the options aim to simplify the airspace by reducing complexity and creating efficiency through systemisation.	The option offers full systemisation of arrivals and departures.	The option offers part systemisation of arrivals and departures.	The option does not offer any systemisation.
		CAP1711 Airspace Modernisation Strategy Strategic objectives: – Environmental sustainability – an overarching principle applied through all modernisation activities, in accordance with the Government's environmental objectives	This objective of the AMS is assessed in mandatory DP3. Within the DPE, to avoid repetition, we will not repeat the text, however we will include the overall red/amber/green outcomes from the DP3 assessment so that it is included in the overall assessment of DP2.	See DP3	See DP3	See DP3
OVERALL DP EVALUATION (Any mixture of Met and partly met, = partly met. If any assessment in this category is found to be inconsistent with relevant legislation, the CAA's airspace modernisation strategy or Secretary of State and CAA's policy and guidance, the evaluation overall becomes Not Met).						
DP3	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.	The government's key environmental objectives (para 1.2 a) Limit and, where possible, reduce the number of people in the UK significantly affected by adverse impacts from aircraft noise	<p>The government has laid out the altitude-based priorities (ANG2017) which should be taken into account when considering the potential environmental impact of airspace changes. With regards to noise the ANG (para 3.3) says to: <i>'in the airspace from the ground to below 4,000 feet the government's environmental priority is to limit and, where possible, reduce the total adverse effects on people'</i>,</p> <p>The Lowest Observed Adverse Effect Level (LOAEL) is regarded as the point at which adverse effects begin to be seen on a community basis. The LOAEL is defined by L<sub>Aeq</sub> daytime and nighttime contours which are modelled based on the number of movements, fleet mix, and position of the flight paths. Quantitative noise modelling, such as the L<sub>Aeq</sub> contours, will not be undertaken until Stage 3 as part of the Full Options Appraisal.</p> <p>In the case of DSA, any option will lead to an increase in adverse effects compared</p>	Full consideration has been given to SID flight path placement to attempt to limit adverse effects from aircraft noise	Some consideration has been given to SID flight path placement to attempt to limit adverse effects from aircraft noise	No consideration has been given to SID flight path placement to attempt to limit adverse effects from aircraft noise

DP#	Design Principle	DP Component	APPROACH TO EVALUATION	MEETS	PARTIALLY MEETS	DOES NOT MEET
			<p>to the baseline however this does not necessarily mean that the option does not meet this objective (and therefore this design principle) as it's important to note that the objective is to 'limit, and where possible reduce'.</p> <p>When arriving, aircraft are required to be lined up with the extended runway centreline as they descend. This is called the final approach. It is not expected that LOAEL contours will extend out far enough to be affected by arrival flight paths beyond final approach.</p> <p>This evaluation therefore considers how the design of the departure routes within an option, aims to avoid population densities under initial climb where there is scope to influence the shape of the LOAEL contours.</p>			
		<p>The government's key environmental objectives (para 1.2 b) Ensure that the aviation sector makes a significant and cost-effective contribution towards reducing global emissions</p>	<p>The government has laid out the altitude-based priorities (ANG2017) which should be taken into account when considering the potential environmental impact of airspace changes. With regards to CO<sub>2</sub> emissions, the ANG (para 3.3) states "in the airspace at or above 4,000 feet to below 7,000 feet, the environmental priority should continue to be minimising the impact of aviation noise in a manner consistent with the government's overall policy on aviation noise, unless the CAA is satisfied that the evidence presented by the sponsor demonstrates this would disproportionately increase CO<sub>2</sub> emissions.</p> <p>The priorities then go onto say 'In the airspace at or above 7,000 feet, the CAA should prioritise the reduction of aircraft CO<sub>2</sub> emissions and the minimising of noise is no longer the priority'</p> <p>This evaluation considers whether the flight paths above 4000ft are disproportionately increasing CO<sub>2</sub> emissions in order to minimise noise impacts 4-7000ft. As DSA's SIDs are proposed to climb above 7000ft, this assessment considers flight efficiency above 7000ft too, within the constraints of other requirements such as the CAA's CAS containment policy.</p>	<p>No flight paths above 4000ft are disproportionately increasing CO<sub>2</sub> emissions in order to minimise noise impacts.</p>	<p>Some flight paths above 4000ft are disproportionately increasing CO<sub>2</sub> emissions in order to minimise noise impacts.</p>	<p>All flight paths above 4000ft are disproportionately increasing CO<sub>2</sub> emissions in order to minimise noise impacts.</p>
		<p>The government's key environmental objectives (para 1.2 c) Minimise local air quality emissions and in particular ensure that the UK complies with its international obligations on air quality.</p>	<p>An evaluation of whether flight paths will overfly any AQMAs below 1000ft.</p>	<p>No flight paths overfly any AQMAs below 1000ft</p>	<p>Some flight paths overfly an AQMA below 1000ft</p>	<p>All flight paths overfly AQMAs below 1000ft</p>
<p>OVERALL DP EVALUATION (Any mixture of Met and partly met = partly met. If any assessment in this category is found to not deliver the Government's key environmental objectives, the evaluation overall becomes Not Met).</p>						

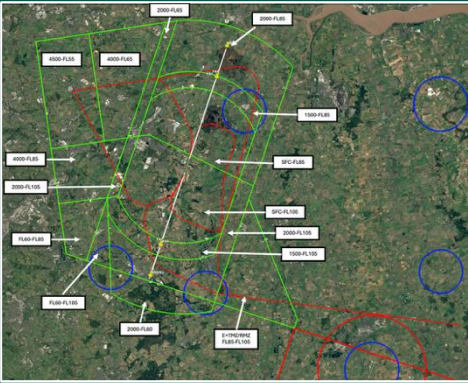
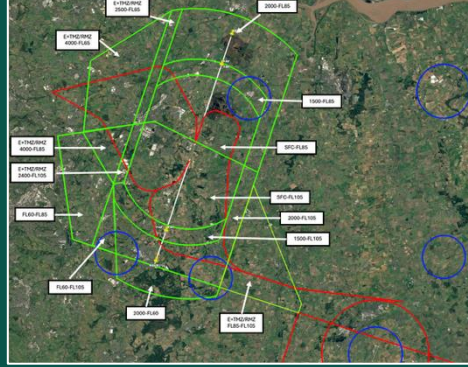
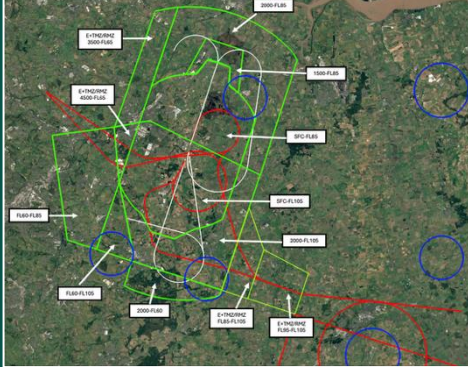
DP#	Design Principle	DP Component	APPROACH TO EVALUATION	MEETS	PARTIALLY MEETS	DOES NOT MEET
DP4	The airspace change proposal should consider the impacts on air navigation service providers and other aviation stakeholders such as nearby airport operators and other airspace users.	N/A	Interactions between DSA arrivals and departures and other airports published arrivals and departures, ATZs, MATZ, Danger areas (Manchester, Leeds).	Option has no impact on ANSPs, airport operators or other airspace users	Option will have some impact on ANSPs, airport operators or other airspace users	Option will clearly have a significant detrimental impact on ANSPs, airport operators or other airspace users
DP5	The airspace change proposal should not modify DSA's previous NPRs unless required for safety or airspace integration purposes.	N/A	Whether DSAs SIDs remain fully, partly or not contained within their extant NPRs.	No changes at all required to extant NPRs	Some changes may be required to extant NPRs	Significant changes required to extant NPRs
DP6	Any airspace structure(s) should be of the minimum size and lowest classification needed to achieve its aims to minimise disruption to, and maximise integration with, other airspace users.	Size of controlled airspace volume	This assessment considers the extent to which the option ensures the amount of controlled airspace is the minimum required to maintain a high standard of air safety and, subject to overriding national security or defence requirements, that the needs of all airspace users is reflected on an equitable basis.	Option is considered to use the minimum volume of CAS required	N/A	Option uses more CAS than is required
		Classification of airspace volume	This assessment considers the extent to which the option proposes the least restrictive classification of airspace to secure the most efficient use of airspace consistent with the safe operation and expeditious flow of air traffic. In particular, CTA, including those in the vicinity of certain aerodromes where an ATC service is provided to aerodrome traffic but where airspace classes A to D cannot be justified, may be notified as Class E airspace.	All CTA classifications lower than Class D	Some CTA classifications lower than Class D	No CTA classifications lower than Class D

DP#	Design Principle	DP Component	APPROACH TO EVALUATION	MEETS	PARTIALLY MEETS	DOES NOT MEET
		Maximise integration	This assessment considers the extent to which the option proposes Class E airspace in combination with the smallest volume of controlled airspace.	Option maximises use of Class E airspace and minimises the volume of controlled airspace	Option proposes some use of Class E airspace and minimises the volume of controlled airspace	Option has no use of Class E airspace and/or does not minimise the volume of controlled airspace
OVERALL DP EVALUATION (Any mixture of Met, Partly met, not met = Partly met)						

Table 12: DPE Methodology

### 5.3 DPE Summary

5.3.1 CAP1616 V5 mandates the use of the DPE proforma provided. These are available in Stage 2(A) Appendix B but are not very easy to use to compare how the different options performed. Therefore, we have also included the DPE assessment in a matrix format within Appendix B. Table 13 provides a summary of the Design Principle Evaluation.

DP#	Design Principle	Option 1	Option 2	Option 3
DP1	The airspace change proposal must maintain a high standard of safety and should seek to enhance current levels of safety.			
DP2	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.			
DP3	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.			

DP#	Design Principle	Option 1	Option 2	Option 3
DP4	The airspace change proposal should consider the impacts on air navigation service providers and other aviation stakeholders such as nearby airport operators and other airspace users.	[Aerial map showing Option 1 airspace boundaries and labels]	[Aerial map showing Option 2 airspace boundaries and labels]	[Aerial map showing Option 3 airspace boundaries and labels]
DP5	The airspace change proposal should not modify DSA's previous NPRs unless required for safety or airspace integration purposes.	[Green shaded cell]	[Green shaded cell]	[Yellow shaded cell]
DP6	Any airspace structure(s) should be of the minimum size and lowest classification needed to achieve its aims to minimise disruption to, and maximise integration with, other airspace users.	[Yellow shaded cell]	[Yellow shaded cell]	[Yellow shaded cell]

Table 13: Design Principle Evaluation Summary

## 5.4 DPE Outcomes

- 5.4.1 Option 1 was evaluated to be inconsistent with relevant legislation, the CAA's airspace modernisation strategy or Secretary of State and CAA's policy and guidance (DP2) with regard to CAA's Policy for the Design Controlled Airspace Structures and has therefore been discontinued.
- 5.4.2 Further rationale beyond the DPE to support discontinuation of Option 1 is based on NERL's feedback to this option which states that *"NATS NERL plc cannot support the proposed approach to reinstate DSA's previous airspace, procedures, NPRs and associated arrangements exactly as they were when the airport was last operational. This is for the following reasons: 1) NATS NERL plc does not believe this will provide the most optimal solution to meet DSA's design principles. 2) 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 NPRs 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 governments open letter on NATS prioritisation."*
- 5.4.3 We provided our stakeholders with an overview of the DPE in March 2026 and advised that CDC had:
- Discontinued Option 0 ahead of the Design Principle Evaluation (DPE)
  - Discontinued Option 1 as a result of not meeting a mandatory design principle
- 5.4.4 The overview provided to stakeholders in March 2026 is available in Appendix A to the Stage 1 Submission Document, Stakeholder Correspondence and Material, on the CAA Portal, [here](#).
- 5.4.5 In May 2026 we addressed comments from CAA's review of our first submission. Whilst this had resulted in additional information within the DPE and some new categorisations, the outcomes are the same as shared with stakeholders in March 2026. However, we will be highlighting the amendment to the DPE to all stakeholders for transparency.
- 5.4.6 Options 2 and 3 are taken forward into the Initial Options Appraisal.