

ACP-2024-028 Holbeach AWR Airspace Change to Enable Current and Future Assets

Stage 2 Develop and Assess Gateway Outcome – 30 July 2026

[STATEMENT]

As part of Stage 2 of the CAP 1616 airspace change process, the UK Civil Aviation Authority (CAA) has completed a Stage 2 Develop and Assess Gateway Assessment of the Ministry of Defence airspace change proposal (ACP) – ACP-2024-028 Holbeach AWR Airspace Change to Enable Current and Future Assets

In accordance with CAP 1616, in order for the CAA to sign-off the Stage 2 Develop and Assess Gateway, the following criteria must have been met:

- **1. Baseline Scenarios and Options Development**
 - The change sponsor **must** develop the baseline scenarios.
 - 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.
 - The change sponsor **must** provide evidence and supporting rationale to justify where single or limited design options are presented.
- **2. Stakeholder Engagement**
 - The change sponsor **must** share the baseline scenarios and design options with the same stakeholders as in Stage 1, so that they can comment accordingly (**should** for Level 2 ACPs)
 - The change sponsor **must** explain the engagement approach/methodology used and the rationale for doing so.
 - The change sponsor **must** provide relevant engagement evidence.
 - 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.
- **3. Design Principle Evaluation**
 - The change sponsor **must** describe the methodology used for the design principle evaluation.
 - The change sponsor **must** evaluate how their baseline scenarios and design options have responded to the design principles, specifying if they have met, partially met, or not met each design principle.
 - The change sponsor **must** publish the design principle evaluation on the Airspace Change Portal.
- **4. Conduct the Initial Options Appraisal**
 - The change sponsor **must** consider the initial options appraisal against the statutory factors and where applicable, government policy that the CAA is required to consider.
 - The change sponsor **must** ensure that the initial options appraisal is objective (unbiased and evidence based), repeatable and consistent.
 - The change sponsor **must** undertake a qualitative and where possible, a quantitative assessment according to the scale of the design options and nature of potential impacts.
 - The change sponsor **must** conduct an initial options appraisal of the potential impacts of each design option against the baseline scenarios.

- The change sponsor **must** provide an indication of the preferred design option(s).
 - The change sponsor **must** provide supporting evidence for the category used in relation to CAP 2091, CAA Policy on Minimum Standards for Noise Modelling applicable to the airspace change proposal.
 - The change sponsor **must** use the most up to date, credible, and clearly referenced sources of data to assess the impacts of the baseline scenarios and design options.
 - The change sponsor **must** identify any evidence gaps in the initial options appraisal and describe what evidence will be collected, and how, to fill such gaps and develop the full options appraisal.
- **5. Habitats Regulations Assessment**
 - The change sponsor **must** conduct the habitats regulations assessment screening exercise.

At the Gateway assessment for this proposal, the CAA concluded that the Criteria were not met for the following reasons:

Technical

While the sponsor has completed a DPE and assessed each option against the agreed DPs, significant deficiencies have been identified in both the methodology and application of the assessment. The sponsor has not described the methodology used to determine assessment outcomes, has not defined the criteria used to assign Met, Partially Met or Not Met ratings, and has not described how the agreed priority order of DPs was applied. Furthermore, a number of DPE conclusions are not adequately supported by evidence, contain internal inconsistencies, and do not clearly differentiate between the design options. In particular, the DPE does not provide a robust or evidence-based rationale for the rejection of Option 3. As a result, it cannot be determined whether the DPE has been applied consistently, objectively or in a manner that supports subsequent option selection decisions. [CAP1616f: 3.31-3.36]

Environmental

The sponsor has not adequately described the baseline scenario in respect of air traffic movements in the vicinity of the proposed airspace change and has provided insufficient evaluation of the environmental metrics in the Initial Options Appraisal in respect of the consequential environmental impacts from other airspace users that are a result of the airspace change. [CAP1616f: 3.60 - 3.62], [CAP1616i: 2.18].

The sponsor has provided insufficient evidence to support the rationale that further habitats regulations assessment is not required, considering both direct and indirect (consequential) environmental impacts associated with the proposed airspace change. [CAP1616f: 3.68 - 3.69], [CAP1616i: 9.2 - 9.9]

Economic

In general, failure to adequately conduct a Design Principle Evaluation and robustly construct the baseline for the current day scenario would prejudice the Initial Options

Appraisal, and therefore require resubmission. [CAP 1616f: 3.35-3.36, 3.54-3.57]. There were other recommendations and observations to help strengthen the appraisal which have been shared with the Sponsor.

Engagement and Consultation

Although the sponsor has undertaken a Stage 2 engagement exercise and provided evidence that the baseline scenarios and design options were shared with a broad stakeholder community, the CAA identified gaps in the engagement evidence. The sponsor has not clearly demonstrated that the same stakeholders engaged at Stage 1 were engaged at Stage 2, nor provided a rationale for apparent additions or omissions from the stakeholder list. There are also numerical inconsistencies in the submission, including the difference between the 116 stakeholder organisations stated as contacted and the 112 stakeholder entries identifiable in Annex B, and the inconsistency between 11 and 12 stakeholder responses. The sponsor has recorded stakeholder comments and responses, and some feedback was incorporated into the baseline scenarios. However, the submission does not clearly demonstrate how all material feedback influenced the baseline scenarios and design options, or why some feedback did not result in changes. In particular, the submission does not provide a clear enough explanation of how stakeholder feedback was considered in the decision to discount Option 3 and carry Options 1 and 2 forward. [CAP1616f 3.27 and 3.30]

The CAA has informed the change sponsor of this decision. In line with CAP 1616, the change sponsor is now able to reconsider its submission before resubmitting it for further review by the CAA at a future Gateway.

It is important to note that whether an ACP passes a gateway successfully or not does not predetermine the CAA's later final decision on whether to approve the airspace change proposal. This decision is not an explicit or implicit comment on the merits or otherwise of this ACP. This will come at the decision-making stage (Stage 5 - DECIDE).

[END STATEMENT]