

CAA Consultation Assessment

Title of airspace change proposal	Aberdeen International Airport Airspace Change Proposal (ACP).
Change sponsor	Aberdeen International Airport Ltd.
Project reference	ACP-2019-82
Account Manager	[REDACTED]
Case study commencement date	17 February 2025
Case study report as at	11 June 2026
<i>Instructions</i> In providing a response for each question, please ensure that the 'status' column is completed using the following options: • YES • NO • PARTIALLY • N/A To aid the SARG Lead it may be useful that each question is also highlighted accordingly to illustrate what is: resolved YES not resolved PARTIALLY not compliant NO	

Executive Summary

Aberdeen International Airport Ltd. is the sponsor of this proposal seeking to introduce Performance Based Navigation (PBN) arrival procedures to provide resilience for the Airport's operation and meet the requirements of the Airspace Modernisation Strategy (AMS). Changes to departure routes, holding procedures and missed approach procedures are out of scope of this airspace change proposal (ACP). The ACP will not change airport capacity.

The sponsor proposes two changes. The first is to adopt PBN arrival procedures by introducing Required Navigation Performance (RNP) procedures to Runway (RWY) 16 and RWY 34. These procedures are proposed for resilience in the event of Instrument Landing System (ILS) loss due to fault or maintenance, and for training purposes. The second change is the proposed release of Controlled Airspace (CAS). Following analysis of surveillance data and discussions with Air Traffic Control (ATC) prior to consultation which identified a portion of Aberdeen's Control Area (CTA) 3 as being underutilised, the sponsor proposes releasing a section of Class D CAS by raising the base level of the Southwest portion of CTA-3 from 3,000 ft to a base of 4,500 ft and renaming the area as CTA-4.

The sponsor conducted a consultation on these two proposed changes predominantly online over a period of 12 weeks between 29 April and 21 July 2024. Twenty feedback responses were submitted. No changes were made to either proposal on account of feedback.

The CAA has required the sponsor to follow version 5 of CAP 1616 Airspace Change Process from stage 4 onwards.

PART A – Summary of Airspace Change Process to date		
A.1	Airspace change proposal public view	
A.2	Stage 1 DEFINE Gateway	November 2022
A.2.1	The required documentation was presented on time, and we were satisfied that the sponsor had met the requirements of the Process up to that point. Progress to the next step of the process was therefore approved.	
A.3	Stage 2 DEVELOP & ASSESS Gateway	January 2023
A.3.1	The required documentation was presented on time. Upon completion of minor actions, we were satisfied that the sponsor had met the requirements of the Process up to that point. Progress to the next step of the process was therefore approved.	
A.4	Stage 3 CONSULT Gateway	March 2024
A.4.1	The required documentation was presented on time. Upon completion of minor actions, we were satisfied that the sponsor had met the requirements of the Process up to that point. Progress to the next step of the process was therefore approved.	
A.5	Stage 4 UPDATE & SUBMIT	December 2024
A.5.1	The sponsor submitted their stage 4 outputs to the CAA. On request, the sponsor submitted supplementary consultation evidence to enable regulatory assessment to commence.	

PART B – Consultation Assessment		
B.1	AUDIENCE	
B.1.1	Did the consultation target the right audience?	Yes
	The sponsor's consultation audience comprised stakeholders already known to Aberdeen Airport from Stages 1 and 2 CAP 1616 engagement activities and others who were identified for stage 3 public consultation. The stage 3 stakeholder audience comprised the following aviation and non-aviation groups: Airlines, airports and aviation industry representatives including Edinburgh International Airport (EDI), Glasgow International Airport, Highlands and Islands Airports Limited (HIAL), RAF Lossiemouth, Babcock Helicopters, Loganair, Ryanair and Easyjet.	

	• Aberdeen International Airport Consultative Committee members. • National Air Traffic Management Advisory Committee (NATMAC) members including NATS NERL plc, Airlines UK, the British Hang Gliding and Paragliding Association (BHGPA), the General Aviation Alliance (GAA), the British Gliding Authority (BGA) and the Ministry of Defence (MoD). • General Aviation (GA) stakeholders including Insch Flying Group, Deeside Gliding Club and Buchan Aero Club. • Constituency MPs/MSPs. • Community Councils and local stakeholders including schools plus environmental organisations such as National Trust Scotland and Search and Rescue Services. In total the sponsor targeted 159 aviation and non-aviation stakeholders representing the groups outlined above. In addition to the groups identified above, the sponsor also notified individuals who had signed up via an online form for ACP updates. It has not been possible to establish how many individuals signed up. A full list of stakeholders was provided at Appendix B to Annex A Consultation Response Document.
B.1.2	Please provide a summary of responses below
	During the consultation 18 responses were submitted. After the consultation had closed, 2 more responses were submitted. All 20 responses were analysed by the sponsor as the late responses were from key stakeholders whose feedback was recognised as being essential to consider and incorporate. The sponsor received responses from the following stakeholders: • NATMAC members: the BGA, the British Microlight Aircraft Association (BMAA), the MoD via Defence Airspace and Air Traffic Management (DAATM) and NATS NERL plc. (Operational Policy) • Airports, airlines and aviation industry: EDI, HIAL, Loganair and Aberdeen ATC • GA airspace users: Four individuals plus 2 responses from Deeside Gliding Club • Six individuals. At Table 5, Annex A Consultation Response Document, the sponsor stated that they received responses from Aberdeen City Council and Strathaven Gliding Club but no responses from the City Council or the Gliding Club were found within the submission. The sponsor has advised that these were from an individual that they knew was from the Council and another individual that they knew was from the Gliding Club. These responses have been captured within the group of six individuals above. The survey form invited feedback on the PBN arrivals and CAS options and at times split respondents into airspace users and non – airspace users. An opportunity was given at the end of the form for any further feedback respondents might have on the proposal. The

	sponsor included a question designed to elicit quantitative feedback on the CAS proposal. Quantitative feedback on the CAS proposal is set out below. At the stage 3 gateway assessment meeting, the CAA made a recommendation for the sponsor to also include a quantitative question on the PBN arrivals option to elicit quantitative feedback data. The sponsor chose not to do so. Qualitative feedback data for the PBN arrivals option is discussed at B5.4 below. The survey form uploaded to the citizen space online consultation platform included preliminary questions, as specified below. The survey form at Appendix B to the Consultation Document V2.0 did not include the preliminary questions and so the questions were numbered differently. References to feedback form questions below relate to the version uploaded to the citizen space consultation platform. Questions 1 – 7 dealt with preliminary items of stakeholder identification and interest in airspace. Questions 8 and 9 sought qualitative feedback on the PBN arrivals consultation options with the sponsor asking at question 8 “What are your thoughts on the proposal to introduce PBN arrivals?” and asking for any further comments on the PBN proposal at question 9. At question 10 respondents were asked whether they are an airspace user. Nine answered yes. At question 11, the sponsor asked regarding the CAS proposal, “As an airspace user, how satisfied are you with the proposed change?” Options were provided for a scaled response of satisfied, neither satisfied nor dissatisfied, and dissatisfied. The 9 airspace users answered that they were satisfied. At question 12, the sponsor asked, “Can you provide details on why you feel that way”. Qualitative data was received from the airspace user respondents, and this is discussed at B5.4 below. At question 13, the sponsor asked, “As an airspace user, in particular for General Aviation pilots, can you think of any visual features that could better define the boundary?” Question 14 asked “Thinking specifically of Controlled Airspace, do you have any further comments?”. At question 15, respondents were not asked anything about the proposals but were asked to select the question to simply move forward to question 19 which was the “Final thoughts” section. At question 16, non-airspace users were asked whether they supported the CAS proposal. Of the 9 non-airspace users, 8 (89%) answered yes and 1 (11%) answered no. Qualitative data was received from a request at questions 17 and 18 for any further comments on the CAS proposal from non-airspace users. At question 19, stakeholders were invited to offer their “final thoughts” on the ACP.	
B.2	APPROACH	
B.2.1	Did the change sponsor consult stakeholders in a suitable way?	Yes
	The sponsor’s consultation was conducted via the online consultation platform citizen space in line with the CAP1616 requirement. Consultation was conducted in a suitable way.	

B.2.2	What steps did the change sponsor take to encourage stakeholders to engage in the consultation?
	The sponsor took the following steps to encourage participation: - On 20 March 2024 after their stage 3 gateway approval, the sponsor emailed existing and newly added stakeholders for stage 3, providing advance notification of the consultation period. - As well as hosting the consultation on citizen space, existing and additional stakeholders were emailed on 29 April and 1 May 2024 informing them that the consultation was launching/had launched. A link was provided to access information on the proposals. - The sponsor offered a 1:1 briefing to elected representatives and local authorities via their launch and reminder emails. - The sponsor held four webinars. The first webinar session was targeted at community consultees, the second at the aviation industry, the third at the GA community and the final webinar was open to all stakeholders. Stakeholders registered to attend each of these four events. None attended the first two, five attended the GA session and three attended the final session. Although attendance figures were low, events were scheduled for different days and times and the sponsor issued reminder emails during the consultation period encouraging stakeholders to participate. - One in-person event was held on 21 May 2024 at the Aberdeen Science Centre, a location with parking and public transport access. This was run as a drop-in event with printed copies of the consultation materials available, members of the project team were present to respond to questions and QR codes and tablets made available to enable responses. There were two attendees. - The consultation was publicised on Aberdeen Airport's website making use of a dedicated ACP webpage. - Having identified an area within a circle radius of 1.5 nautical miles around the location where the new arrival procedures will join the final approach, and from the immediate surrounding areas, the sponsor carried out a leaflet drop to residents at c.164 addresses within the area. No responses were received although the sponsor points out that they highlighted that there would be no material change for residents within this area. - Four posts were made on the Airport's existing social media platforms Facebook, X and LinkedIn sites to publicise the consultation. Three of these were made at the start of the consultation on 29 April 2024 and a further post was made on 3 June 2024, 5 weeks after the consultation had commenced. Social media statistics have been supplied showing that a total of 13,434 people were reached. There were 123 post clicks and 199 link clicks. - Hard copies of the consultation materials were deposited at Aberdeen Central Library. This location was publicised via citizen space and the Airport's website. - A telephone number, email address and postal address were included in the consultation materials for those stakeholders seeking more information or requesting hard copies of the documentation and survey form. No enquiries were received.

	No hard copy forms were received. The sponsor took a proactive approach towards the end of the consultation emailing some key stakeholders who had not yet responded, to encourage them to do so. The sponsor has explained that they decided not to communicate via local newspapers or radio due to the limited impacts of the proposed change, anticipating that widespread broadcast could have resulted in apprehension about the proposals by members of the public not affected. This rationale is considered reasonable and acceptable. Evidence of the steps taken to encourage participation has been submitted (Appendix C to Annex A Consultation Response Summary Document) and reviewed.	
B.2.3	Was the change sponsor required to respond to any unexpected events and/or challenges?	Yes
	The sponsor has not referred to any unexpected events or challenges, but the email evidence shows that a glitch on the citizen space survey was raised by one respondent who said that it did not allow them to complete their “final thoughts” on the ACP at question 19. The sponsor replied acknowledging the issue and explained that the survey could not be edited once it had gone live. They suggested a workaround solution and the respondent subsequently replied that they had completed the survey.	
B.3	MATERIALS	
B.3.1	What materials were used by the change sponsor during the consultation?	
	The sponsor adopted a tiered approach to producing consultation materials, publishing the following: - A short 9-page Summary Document V2.0 designed as an easy-to-understand outline of the consultation, supplemented by graphics and diagrams to aide understanding. It included a high-level summary of anticipated impacts and an outline of the proposals. Stakeholders were referred to the consultation document for more detail. Consultation Document V2.0 in which a summary of earlier CAP 1616 work was provided together with an explanation regarding CAA approval for Aberdeen Airport to withdrawn from the UK Airspace Change Masterplan due to there being no interdependencies between Aberdeen’s proposals and those of the other Masterplan Airports. The current day scenario was outlined supported by aviation charts and graphics. The PBN Arrivals option (Vectors to RNP approaches) was presented together with anticipated benefits and impacts. The existing CAS scenario was explained followed by the proposal to raise the base level of CTA-3 from 3,000 ft to 4,500 ft and the anticipated benefits and impacts of doing so. There were two Appendices: Appendix A Full Options Appraisal (FOA) summary and Appendix B Feedback form. - Stakeholders were signposted to technical detail contained within the FOA V2.0 and to WebTAG assessments contained within the FOA Technical Appendix V2.0. - A comprehensive Consultation Glossary and Terms document was published at consultation launch. The sponsor supplemented text explaining key aviation terminology with diagrams, for e.g., to illustrate how runways are used and to	

	support explanations on controlled airspace. • A set of FAQs V2.0 was published on citizen space at consultation launch. Although the sponsor planned to update the document as the consultation progressed, they found that there was no need to do so. • The sponsor's Consultation Strategy V2.0 addressed identification of their stakeholder audience, consultation approach, planned consultation materials and length together with plans for supporting events.	
B.3.2	Did the materials provide stakeholders with enough information to ensure that they understood the issue(s) and potential impact(s) on them?	Yes
	The current scenario at Aberdeen Airport was outlined. Text was supplemented by diagrams, graphics and charts to aide understanding. The material was written in plain English and there was a logical flow to the consultation document. The anticipated benefits and impacts of each of the proposed options were outlined. Instructions on how to provide feedback were clear.	
B.4	LENGTH	
B.4.1	Please confirm the start/end dates and the duration of the consultation below	
	Start date: 29 April 2024 End date: 21 July 2024 Duration: 12 weeks.	
B.4.2	If duration was less than 12 weeks, what was the justification?	N/A
	N/A	
B.4.3	Was the period of consultation proportionate?	Yes
	The period of consultation was in accordance with the CAP 1616 accepted standard of 12 weeks.	
B.5	GENERAL	
B.5.1	Was the conduct of the consultation aligned with the consultation strategy?	Yes
	The sponsor committed to holding the public event and webinars prior to the start of summer school holidays in Aberdeenshire. One email dated 13th June 2024, sent to attendees of the third webinar, refers to the last webinar being on 21 July but further to a CAA clarification question, the sponsor has confirmed this was a typographical error. The consultation closed on 21 July 2024, and the last webinar was held on 21 June which was before the start of the summer school holidays in Aberdeenshire. A subsequent email dated 18th June 2024 included the correct date for the final webinar session. There is no evidence to show that any stakeholders who intended to attend a webinar were disadvantaged by this error.	

	The conduct of the consultation was aligned with the strategy.	
B.5.2	Has the change sponsor categorised the responses in accordance with CAP 1616?	Yes
	Yes, the sponsor categorised the responses in accordance with CAP 1616. The CAA reviewed the categorisation and found that the sponsor had categorised the responses fairly.	
B.5.3	Has the change sponsor correctly identified all the issues raised during the consultation and accurately captured them in the consultation response document?	Yes
	Yes, the sponsor has identified all issues and captured them within summary feedback tables, along with their response.	
B.5.4	Does the consultation response document detail the change sponsor's response to the identified issues? Is the change sponsor's response to the issues raised appropriate/adequate?	Yes
	<u>Expressions of support for PBN arrivals</u> NATS NERL plc. considered it a positive step to introduce PBN operations. Noting the limited use of the PBN approach, they stated that if there were a change in circumstance, then the environmental element would need to be re-examined. The MoD stated that there would be predominantly nil impact to them and that the introduction of PBN arrivals may positively influence the airport's availability as a diversion for suitably equipped MoD aircraft. EDI were of the view that PBN arrivals are an excellent idea and hoped that they would be introduced soon to benefit airspace users. The BMAA expressed support stating it was unlikely to affect their members. The BGA were supportive on the basis that they couldn't see PBN arrivals having any significant negative impact. Comments made by individuals expressing support included that PBN arrivals could be introduced without having any effects on current approach procedures into Aberdeen, they would streamline options available to many types of aircraft and would extend options available to pilots in different meteorological conditions and operational environments. Sponsor's response: The sponsor responded to NATS stating that the assessments with the FOA reflect an optimistic uptake of PBN arrivals based on expected use for resilience and training. A change in circumstance would require a separate CAP 1616 ACP and assessment of environmental impacts. <u>Expressions of support for the raising of the CAS base level proposal</u> The MoD stated that the raising of CAS base level would simplify low level flying operations in the area. EDI thought it was a good idea to reduce CAS volume where safe to do so saying that Class D airspace is available to Visual Flights Rules (VFR) traffic by making a call. The BMAA stated that it was their policy to support the release of unnecessary controlled airspace. Deeside Gliding Club stated that this would bring operational and safety benefits including being able to tow further upwind, making it easier to plan and execute cross country flights, opening up soaring opportunities to the east without requiring ATC contact, reducing the chances of airspace infringements and making	

entry negotiations easier. A GA user stated that when flying from Aboyne users are right on the edge of current airspace and it is easy to stray into the airspace so the change would allow for safer flying ensuring no airspace infringements. Individuals supporting the proposal commented in a similar manner, that it would make the airspace safer, provide more airspace for GA users, simplify low level flying operations in the area and reduce risk of CAS infringements.

Two conditions are proposed at B6.2 below for the sponsor to fulfil prior to implementation, to raise awareness of the raising of the CAS base level with its GA stakeholders and with the Central Scotland Local Airspace Infringement Team.

Qualitative feedback was received and responded to by the sponsor on the following issues:

GPS jamming and spoofing

The BGA referred to GPS jamming and spoofing as demonstrated how fragile a PBN approach could be and suggested that Aberdeen Air Navigation Service Provider have a strategy for dealing with these events.

Sponsor's response: In the rare event of a GNSS outage the existing conventional approaches will continue to be promulgated and available for Aberdeen arrivals. There are no plans to withdraw any of the existing conventional approaches.

Single waypoint

One stakeholder queried whether a single waypoint would be sufficient on the assumption that there would be an increase in the use of PBN systems.

Sponsor's response: As the proposed procedures are being introduced predominantly for resilience and training purposes, it is expected that the PBN arrivals design using a single waypoint for each runway end will be appropriate for Aberdeen traffic. Most aircraft are expected to continue to use the ILS when arriving at Aberdeen Airport.

Request for more CAS

One individual asked for more, not less, CAS and the sponsor was asked not to release the airspace based on concerns that aircraft would have to stay higher for longer and expressing the view that gliders have hundreds of miles of open airspace whereas ATC at Aberdeen and the airlines do not. Their view was that releasing the airspace would not stop infringements.

Sponsor's response: Prior to consultation, we analysed surveillance radar data to understand what could be safely achievable. The data showed no departures utilise the proposed portion of airspace and on average only 1 fixed wing and 1 rotary aircraft arrival per week utilise the airspace. Feedback opposing the CAS proposal was shared with ATC for their review ahead of their own consultation response and ahead of the Stage 4 safety assessment. ATC found that releasing the section of airspace will be of great benefit to the GA community, without adversely affecting the overall ATC operation. A benefit is expected in the reduction of CAS infringements, particularly in the vicinity of Aboyne gliding site.

Suggestions of visual features that could better define the boundary

Although Deeside Gliding Club responded that they would have moving map displays showing the airspace boundaries and so weren't

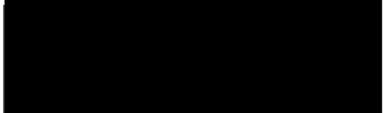
	concerned about the boundaries not being well defined by ground features, other respondents suggested the addition of more visual reference points (VRPs) near the boundary or VFR checkpoints with Inch VRP suggested at the north and Invercannie Water Works suggested for the eastern edge of the boundary. Sponsor's response: We must follow the CAA's Policy for the establishment of visual reference points (VRPs) as part of the airspace change process. Establishment and review of VRPs is the responsibility of the Air Traffic Service Unit (ATSU). Aberdeen's ATSU is run by NATS NSL and so we shared these suggestions with the NATS NSL ATC team for their consideration. Potential VRP additions have been considered against the requirements of the CAA policy. Inch VRP is already established and will remain fit for purpose as an initial routing point into the Control Zone (CTR) from the west and northwest. The suggestion of Invercannie Water Works has been carefully considered. It is located on the new CAS boundary line however it is located c1.5nm west of an existing VRP at Banchory. The Banchory VRP is long established over an area which is considered more prominent than the waterworks. As a result, the establishment of Invercannie Water Works as a VRP will not be progressed as it would not meet requirements (b) and (d) of the CAA policy where (b) is that the VRP should be based upon prominent features and (d) states that there should be no confliction with VRPs associated with adjacent aerodromes. The sponsor has explained that ATC also considered a VRP at Alford, but no prominent feature could be identified other than the town itself and CAA policy states that towns should be avoided. <u>Feedback on Tay CTA</u> One respondent stated that Tay CTA should be reclassified from Class A to Class D or E to permit VFR transits Sponsor's feedback: This is out of scope as any such changes would be undertaken by NATS. The feedback was shared with NATS for their consideration.	
B.5.5	Is the formal airspace change proposal aligned with the conclusions of the consultation response document?	Yes
	Yes, both are aligned.	
B.5.6	Was a Public Evidence Session required for this proposal? If yes, was any new evidence presented which could alter the conclusions of the consultation response document and/or formal airspace change proposal submission?	N/A
B.6	RECOMMENDATIONS/CONDITIONS/PIR DATA REQUIREMENTS	
B.6.1	Are there any Recommendations which the change sponsor <u>should try</u> to address either before or after implementation (if approved)? If yes, please list them below.	Yes

	The sponsor should try to address the following recommendations prior to implementation (if approved): • The sponsor should engage with the Central Scotland Local Airspace Infringement Team (LAIT) to raise awareness of the reclassification of a portion of CTA3 airspace between 3000ft and 4,500ft., and renaming as CTA4. • The sponsor should notify its General Aviation stakeholders of the reclassification of a portion of CTA3 airspace between 3000ft and 4,500ft., and renaming as CTA4.	
B.6.2	Are there any Condition(s) which the change sponsor <u>must fulfil</u> either before or after implementation (if approved)? If yes, please list them below.	N/A
B.6.3	Are there any specific requirements in terms of the data to be collected by the change sponsor for the Post Implementation Review (if approved)? If yes, please list them below.	Yes
	<u>STAKEHOLDER OBSERVATIONS</u> The sponsor is required to collate related stakeholder observations (enquiry/complaint data) and present it to the CAA. Any location/area from where more than 10 individuals have made enquiries/complaints must be plotted on separate maps displaying a representative sample of: • aircraft track data plots; and • traffic density plots The plots should include a typical days-worth of movements from the last month of each standard calendar quarter (March, June, September, December) from each of the years directly preceding and following implementation of the airspace change proposal.	

PART C – Consultation Assessment Conclusion(s)		
C.1	Does the consultation meet the CAA's regulatory requirements, the Government's guidance principles for consultation and the Secretary of State's Air Navigation Guidance?	Yes

	The fundamental principles of effective consultation are targeting the right audience, communicating in a way that suits them, and giving them the tools to make informative, valuable contributions to the proposal's development. I am satisfied that these principles have been applied by the sponsor before, during and after the consultation. I am also satisfied that the sponsor has conducted this consultation in accordance with the requirements of CAP 1616, that they have demonstrated the Government's consultation principles, and that the consultation has: • Taken place when the proposal was at a formative stage – evidenced by text within the Consultation document stating that the sponsor wanted to gather as much feedback as possible to ensure everyone's views were given consideration. The sponsor committed to reviewing how the options could be amended on account of consultation feedback. • Presented the consultation material clearly and outlined the potential impacts that needed to be considered – evidenced by text that was written in plain English and supplemented by diagrams, graphics and charts to aide understanding. The anticipated benefits and impacts of each of the proposed options were outlined. Instructions on how to provide feedback were clear. • Provided a sufficient timeframe to allow considered responses – evidenced by a 12-week consultation period which was in accordance with the CAP 1616 accepted standard on consultation length. • Took into account the product of the consultation. No changes were made to the PBN arrival procedures or to the proposed CAS base level on account of consultation feedback; however, this gunning principle is evidenced by how the sponsor responded to feedback. For example, where suggestions were made for visual features and where a stakeholder highlighted safety considerations regarding the CAS proposal, careful consideration was given to the feedback, and it was shared with ATC and NATS respectively for their attention.
--	--

Level 1 ACP [please delete as applicable]

PART D – Consultation Assessment sign-off			
	Name	Signature	Date
Consultation assessment completed by Airspace Regulator (Engagement and Consultation)			11.06.26
Consultation assessment conclusions approved by Principal Airspace Regulator (Engagement and Consultation)			18/06/26

Consultation assessment approved by Manager Airspace Regulation			14/9/26
--	---	---	---------