

## Response ID ANON-622E-FYTN-Z

Submitted to Consultation on the airspace change process  
Submitted on 2025-11-27 13:01:48

### About you

1 Are you responding as:

National representative organisation

Other (please specify what type of respondent you are)::  
Aviation Environment Federation

2 If you are a change sponsor or consultancy, what type?

Not Answered

Other (please specify)::

3 Where do you live or where is your organisation based?

South East

4 Can we publish your response?

Yes

### Proposal 1: Reduce, remove or amend Gateways (applicable to all airspace change proposals)

5 Do you agree or disagree with our preferred option (option 3) to introduce a Stage 1/2 milestone check and retain a Stage 3 gateway?

Disagree

Please tell us why you have responded in this way:

CAP1616 states: "The gateways are there to determine whether the airspace change process has been followed up to that point, and whether to approve progress to the next stage." [<https://www.caa.co.uk/publication/download/25767>]. Gateways are appropriate check points. If an ACP progression fails to meet the requirements at each stage, the CAA may halt progress, which is an appropriate and responsible intervention.

Your consultation document acknowledges that: "Retaining the gateways would help to provide assurance to change sponsors and stakeholders that the change sponsor has met the airspace change process requirements up to that point and could not progress further in the process until those requirements were met."

However, you state that "retaining all gateways would not take the opportunity to make the regulatory process more proportionate". You have not set out what you mean here: proportionate to what, and who benefits primarily?

Your proposal to replace gateways 1 and 2 with milestones would remove this assurance as it "would not stop the change sponsor progressing in the process based on the process requirements being met or not met."

Your additional proposal that "the change sponsor could choose to do further work and to resubmit to the same milestone check for further feedback" is simply too weak. If the ACP sponsor has not met the process requirements, the CAA must intervene to halt progress to provide sponsors and stakeholders with assurance. It is not clear that the proposed use of milestones would meet the stated intent that milestones are an opportunity to make the process more proportionate: if the CAA has to check, potentially multiple, iterations, there appears little evidence to suggest that the CAA or the sponsor will save time or effort when compared to the current gateway approach.

Gateway assurances are, as you know, valued by sponsors and stakeholders. A summary of the findings of the 2023 review of CAP1616 states that sponsors like the gateway approach (though would like more certainty of success and flexibility and more support). It was also reported that stakeholders "Like the concept of a gateway process as it provides transparency and ensures engagement". They were also reported to feel strongly that the review was "trying to make changes easier for all aviation, avoiding scrutiny consideration of others and impacting wellbeing [sic]". [<https://www.caa.co.uk/Documents/Download/10157/221bf11e-7110-42e5-a931-6ce3cc7a0cbe/5>].

CAP1616 also states: "For each gateway, the change sponsor must have produced and published relevant outputs on the airspace change portal and submitted related evidence to the CAA at least two weeks in advance of the gateway assessment." This is crucial in terms of transparency and accountability. However, it is not clear whether the proposed milestone process would require the ACP sponsor to publish this information pending feedback. The consultation document CAP3157 states only that an agreed timeline of milestones would be published on the airspace change portal together with the CAA feedback on documents submitted. It is not possible to have an informed view on the proposed changes without this clarification.

6 If you disagree with our preferred option (option 3), what is your preferred option?

Option 1: no change

Please tell us why you have responded in this way:

The formal gateway system provides strong assurances to sponsors and stakeholders that ACPs are being progressed correctly. The proposals for an informal oversight mechanism at a 1/2 milestone weaken the CAA's function as a regulator and make the ACP sponsor less visible to scrutiny. The ACP sponsor could ignore feedback at the 1/2 milestone but could then face late-stage intervention at Stage 3 of the process if the CAA found that Stage 1 and 2 requirements had not been met. The rationale for a later-stage intervention is not clear. In the light of community dissatisfaction with the CAP1616 process to date, the CAA should instead be strengthening and setting out more clearly the requirement for community involvement in statements of need, design principles and initial options appraisal.

Proposal 2: Define the role of proposer, change sponsor and partner (applicable to all airspace change proposals)

7 Do you agree or disagree that a new proposer role is created – who proposes the airspace change and may or may not sponsor the change through the process?

Unsure

Please tell us why you have responded in this way:

8 Do you agree or disagree that at the assessment meeting it should be confirmed who is the proposer and who is the sponsor?

Agree

Please tell us why you have responded in this way:

The process should ensure transparency at all stages.

Proposal 3: Create a new set of standard design principles which apply to all airspace change proposals (applicable to all airspace change proposals)

9 Do you agree or disagree that the CAA should produce a new list of standard design principles which apply to all airspace change proposals?

Disagree

Please tell us why you have responded in this way:

A standardised approach reflecting community concerns and issues could ensure sponsors consider all relevant issues, but equally, we have significant concerns about this proposal if it compromises the ability to deviate, where appropriate, to take account of local circumstances. Principles already agreed in response to local concerns and engagement should not be revised without meaningful consultation.

Finding a balance between these objectives could be challenging. More broadly, support for standardised design principles (SDPs) would be on the basis that they would give due weight to community and environmental concerns, but previous experience suggests that community expectations may not be met. While it is proposed that change sponsors should "consider local issues and circumstances against the new set of standard design principles", it is not clear what this would mean in practice. If this means that standard design principles could be disregarded in the face of local circumstances, it weakens the case for standardisation. If it doesn't then we suspect the requirement to engage on local circumstances is meaningless.

Standardising the design may lead to a lack of flexibility with regard to what is best for communities. The consultation document states that 'Change sponsors must also consider developing bespoke design principles.' This is weak. There is a risk that sponsors could exploit it by claiming to have considered bespoke design principles while having failed to do so.

10 Do you agree or disagree that a change sponsor should engage with relevant stakeholders to consider local issues and local circumstances against the new set of design principles?

Disagree

Please tell us why you have responded in this way:

See our answer to question 9.

We specifically and strongly object to the proposal that stakeholder engagement should be "focused on representative-level engagement" if it is defined as engagement with elected representatives only rather than with community groups. We wholeheartedly support engagement with elected representatives but not at the exclusion of community groups who are often better informed and more personally impacted than elected representatives. This could be interpreted as an attempt to silence the voices of people most concerned and impacted by airspace change.

Proposal 4: Reduce the number of appraisals by removing the initial options appraisal (applicable to all airspace change proposals)

11 Do you agree or disagree that the initial options appraisal should be removed from the airspace change process (option 1)?

Disagree

Please tell us why you have responded in this way:

The current version of CAP1616 states that the initial options appraisal (IOA) must include “an initial options appraisal of the potential impacts of each design option against the baseline scenarios.” and, as a minimum, the initial options appraisal of the baseline scenarios and each design option must include: “a qualitative assessment of the likely environmental impacts, including all direct and consequential impacts”.

In addition the initial options assessment 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.” The change sponsor “must submit the required outputs to the CAA for assessment at the ‘develop and assess’ gateway and publish them on the airspace change portal.”

Clearly, the IOA allows communities to scrutinise design options and, through their local representatives, feedback on ACPs at an early stage in the process. Removing the IOA, means that communities would lose an early opportunity to express their concerns about evidential gaps and on issues such as noise and air pollution that might be poorly addressed further along in the process. Overall, there would be less transparency and accountability in the ACP process.

12 Do you agree or disagree that, in Stage 2, the change sponsor should be required to present a high-level description of the methodology they intend to follow to develop the assessments for the full options appraisal?

Disagree

Please tell us why you have responded in this way:

We disagree with the proposal to remove IOA for the reasons set out above.

Proposal 5: Combine Stage 1 and Stage 2 of CAP 1616 into a single stage (applicable to all airspace change proposals)

13 Do you agree or disagree that Stage 1 and Stage 2 should be combined in one stage?

Disagree

Please tell us why you have responded in this way:

The effect of proposals 4 and 5 would be to reduce community engagement in airspace changes and delay it until a later stage in the process by when many options would have been eliminated and it would be far more difficult to take proper account of community views. It seems to us highly likely that this could become a mechanism for sponsors to ignore community views.

14 Do you agree or disagree with our proposed high-level overview of requirements to retain in a combined Stage 1 and Stage 2?

Disagree

Please tell us why you have responded in this way:

We don't agree with the proposal to combine Stage 1 and 2 for the reasons set out above.

Proposal 6: Remove the requirement for the CAA's assessment of the initial and full options appraisals (applicable to all airspace change proposals)

15 Do you agree or disagree that the requirement for the CAA's assessment of the change sponsor's initial and final options appraisals is removed (option 1)?

Disagree

Please tell us why you have responded in this way:

We do not understand the asserted benefits of this proposal. We are aware that the CAA currently prepares and publishes an options appraisal assessment of sponsors' initial and full options appraisals and we believe that should continue. We are not aware of a separate requirement for the CAA to review whether the initial and full options appraisals have met the requirements of the airspace change process at these stages; these seem to us to be one and the same thing.

In any event we do not believe that regulatory scrutiny should be delayed until final options appraisal. By that stage it is highly unlikely that community views could be properly incorporated in what would be a well- progressed industry-led proposition, with the CAA facing potential pressure to progress the modernisation programme at pace. There should be regulatory scrutiny at all key stages of the process with stronger and clearer mechanisms for ensuring community views are sought and reflected in proposals.

Proposal 7: Reduce the number of metrics in the options appraisal (applicable to all airspace change proposals)

16 Do you agree or disagree that the options appraisal should include a shortened list of metrics?

Disagree

Please tell us why you have responded in this way:

We strongly disagree with the proposal to remove capacity metrics from options appraisals and with the CAA's rationale for doing so. The primary objective of the modernisation programme is to increase airspace capacity. One of the primary impacts on communities will be noise from additional aircraft enabled by airspace change. The removal of capacity metrics from options appraisals could result in the cumulative impacts of aircraft noise and air pollution being underestimated.

It seems unlikely that change sponsors will evaluate their proposals without using economic and capacity criteria. Under the proposal, however, this information will not be released. In view of this, we are especially concerned that removing capacity and economic metrics from options appraisals will limit the ability of key community stakeholders to engage because they will not have had sight of relevant information. Without being able to scrutinise and comment on all the evidence, decisions could result in short term economic benefits being prioritised over long term community disbenefits.

At any airport without an effective ATM cap additional capacity created by airspace changes would amount to a free gift to the industry, without any regulatory scrutiny, if the impacts of that capacity were not disclosed and assessed by the airspace change process. Instead of dropping this requirement the CAA should strengthen its assessment of the impacts on additional capacity on the environment and communities.

Perhaps the revision of CAP1616 provides an opportunity to add a metric that would in the medium term save time. We suggest that, in addition to the current specified noise metrics, 45dB Lden should also be tested. Our suggestion is based on a statement made by the UKHSA to the Planning Inspectorate with regard to Heathrow R3 proposals:

"UKHSA is of the view that a LOAEL of 45dB Lden would be more consistent with the current state of the evidence. It would also capture in a more comprehensive way the adverse effects of noise attributable to noise for the purpose of the Health Impact Assessment as required by the Airports National Policy Statement (ANPS)."

17 Do you agree or disagree with the shortened list of metrics we have proposed?

Disagree

Please tell us why you have responded in this way:

Please see our response to question 16. In addition, there is insufficient information to inform an answer.

18 Are there any other metrics or factors you think should be included in the options appraisal, and if so, why?

Are there any other metrics or factors you think should be included in the options appraisal, and if so, why?:

Instead of dropping this requirement, the CAA should strengthen its assessment of the impacts on additional capacity on the environment and communities .

**Proposal 8: The UKADS provider would perform full and final options appraisals of the system end state against the baseline scenarios (applicable to all airspace change proposals)**

19 Do you agree or disagree that the UKADS provider should be required to only perform an assessment of the end state design option(s) against the baseline scenarios in the full and final options appraisals – our preferred option?

Unsure

Please tell us why you have responded in this way:

Without clearer explanation and illustration it is difficult to understand the implications of this proposal.

What would happen for example if later stage deployments, perhaps those that delivered community benefits, could not be achieved or were delayed? What recourse would impacted stakeholders have? Who would be responsible for monitoring and enforcing delivery of deployments?

20 Do you agree or disagree that the UKADS provider should not be required to quantify and/or monetise each of its deployment stages?

Unsure

Please tell us why you have responded in this way:

Please see our response to question 19.

21 Do you agree or disagree that year 10 (after implementation with the proposed airspace change) is still an appropriate duration for the appraisal period, given that the deployments within some complex airspace change proposals may span longer or shorter than 10 years?

Unsure

Please tell us why you have responded in this way:

Please see our response to question 19

22 If you disagree, what do you think is an appropriate duration for the appraisal period for a complex airspace change proposal implemented in a series of deployments?

If you disagree, what do you think is an appropriate appraisal period for the single airspace change proposal in the London Cluster sponsored by the UKADS provider?:

Proposal 9: The UKADS provider would assess the combined impacts, including any cumulative impacts, of the system-wide design in the final options appraisal at Stage 4 (applicable to the UKADS provider sponsored airspace change proposals)

23 Do you agree or disagree that the UKADS provider should be required to assess the combined system-wide impacts, including any cumulative impacts, in the final options appraisal at Stage 4 instead of Stage 3

Unsure

Please tell us why you have responded in this way:

Cumulative impacts are important and many communities report being overflowed by traffic from more than one airport or airfield. We support giving this issue proper consideration. However, without clearer explanation and illustration it is difficult to understand the implications of this proposal.

It appears that there would be no cumulative impacts assessment of OPTIONS, only of the FINAL SYSTEM-WIDE DESIGN once it had been selected and developed post consultation. This would make it impossible to assess whether the proposed design achieved an acceptable balance of community and industry benefits compared to other options. Communities will not get to see rejected options which may have given rise to a better noise climate.

24 Do you agree or disagree that the assessment of cumulative impacts should be based on LAeq,16h and LAeq,8h noise exposure and overflight up to 4,000 feet?

Unsure

Please tell us why you have responded in this way:

Please see our response to question 23.

In addition, we should like to see assessments beyond LAeq. Specifically: Lmax noise footprints of the noisiest aircraft using each of the routes being designed so we can assess the risk of, for example, communities sleep disturbed and the speech interference in schools; Lden and Lnight contours so the output could be directly compared with emerging European health research; N70 and N65 daytime contours and N60 and N55 night time contours (because communities find this metric easier to understand); and one hour LAeq contours for when the route is being used, which would help demonstrate the actual noise energy experienced by people on the ground, compared to the smoothing effect of 8/16hour LAeq.

25 Are there any other metrics you think the UKADS provider should use for the assessment of cumulative impacts? Please specify what metrics.

Are there any other metrics you think the UKADS provider should use for the assessment of cumulative impacts? Please specify what metrics.:

Please see our responses to questions 23 and 24.

Proposal 10: Remove reference to 12 weeks as the accepted standard length for permanent airspace change consultations but maintain the requirement for change sponsors to agree with the CAA an appropriate period of consultation (applicable to all airspace change proposals)

26 Do you agree or disagree with our preferred option (option 1) to remove reference to 12 weeks being the accepted standard length for permanent airspace change consultations but maintain the requirement for the change sponsor to agree with the CAA an appropriate period of consultation?

Disagree

Please tell us why you have responded in this way:

Airspace change proposals can be complex to understand and communities need an appropriate time to respond to consultations.

The consultation document states: "We have a number of duties under section 70 of the Transport Act 2000, when considering whether to approve an airspace change proposal, including taking account of specific guidance on the environmental objectives given to the CAA by the Secretary of State contained within the Air Navigation Guidance 2017 [ANG]." The 2017 ANG is still current. One of its key overall objectives is to: "strengthen the UK's airspace change process and its transparency, particularly with respect to how local communities are involved within it". However, the CAA's proposals to shorten some (unspecified) ACP consultation exercises will weaken community engagement and will not be in line with the 2017 ANG.

The Government's Consultation Principles 2018 state that "Consultations should take account of the groups being consulted". It similarly states that consideration should be given to tailoring consultation "to the needs and preferences of particular groups". In other words, the consultation exercise should be proportionate to the needs of different groups.

[[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/703564/Consultation\\_principles\\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/703564/Consultation_principles_.pdf)].

In order to inform the decision-making process, consultation responses need to be evidence-based and accurate. However, AEF and community representatives have frequently raised the issue with the CAA that members of the public can lack the knowledge to respond to a permanent ACP in a meaningful way. In addition, members of the public often have to respond to these consultations in their spare time and in addition to work and care commitments, presenting another barrier.

CAP 1616f acknowledges that the current 12-week permanent ACP consultation period may be inadequate. It states: "The accepted standard stated in the airspace change proposal guidance is that permanent airspace change consultations should last for 12 weeks, allowing extra time where appropriate."

The CAA's proposal to remove reference to 12 weeks as the accepted standard length for permanent airspace change consultations is out of step with the Government's Consultation Principles as well as the ANG.

It is also out of step with public opinion. When the CAA consulted on the same proposal in 2023, 52% of respondents wanted to retain the accepted standard of 12 weeks for consultation, 35% wanted to remove it and 13% were unsure." This being the case, CAA rightly retained the accepted standard of 12 a 12-week consultation period in CAP 1616: edition 5.

The proposal to maintain the requirement for change sponsors to agree with the CAA an appropriate period of consultation is inadequate. It fails to deliver enhancements to stakeholder engagement that are required by the current ANG. This process should be ongoing, but the proposal represents a backward step and fails to show how it adheres to the Government's Consultation Principles for the reasons set out above.

The 12-week consultation period should be maintained as the accepted standard.

### Proposal 11: Refine and introduce new criteria for convening public evidence sessions (applicable to all airspace change proposals)

27 Do you agree or disagree that public evidence sessions should be retained for Level 1 airspace change proposals – which are highly complex or impactful, or have a high level of public interest to justify a public evidence session, and it is proportionate to do so?

Unsure

Please tell us why you have responded in this way:

The question does not reflect the wording in the consultation document.

As stated in the document: "for Level 1 airspace change proposals, [currently] the CAA may organise a public evidence session where there is sufficient interest to justify holding one and it is proportionate to do so."

Proposal 11 states that the CAA proposes to: "Refine and introduce new criteria for convening public evidence sessions [applicable to: All airspace change proposals]."

It then proposes that the triggers for convening a public evidence session should be the following, narrower, criteria:

"[1] Level 1 airspace change proposals only, which are highly complex or impactful, or have a high level of public interest to justify a public evidence session, and it is proportionate to do so."

However, the consultation does not seek feedback on whether the criteria for triggering a PES should change. Instead, the question on PES assumes that the proposed revisions to narrow the criteria are already in place, asking whether they should be retained, rather than implemented.

As stated in the consultation document: "The public evidence session gives stakeholders, other than the change sponsor, an opportunity to directly provide the CAA decision-maker with their views on the airspace change proposal, in a public forum."

The proposals tighten the criteria for holding a public evidence session and appear to make it easier for the CAA to refuse to hold one. In our view public evidence sessions should be the norm in any change that has significant community impacts; we therefore do not support this proposal.

28 Do you agree or disagree that public evidence sessions should also apply to all airspace change proposals sponsored by the UKADS provider with five or more partners involved?

Unsure

Please tell us why you have responded in this way:

We agree that public evidence sessions should also apply to all ACPs sponsored by the UKADS. However, the rationale for the criterion is not set out. Respondents to this consultation need to know why five partners at a minimum would be the trigger in order to make a judgement.

### Proposal 12: Remove the possibility of publication of draft CAA decisions (applicable to all airspace change proposals)

29 Do you agree or disagree that the draft CAA decision for Level 1 airspace change proposals should be removed (option 1)?

Disagree

Please tell us why you have responded in this way:

The CAA's argument that it has not utilised this option since its introduction seems to us to be a spurious one. As far as we are aware, very few airspace modernisation proposals have yet been determined so removing the possibility of draft decisions appears to us to be premature given the potential impact of these decisions on communities.

Proposal 13: Consolidate Stage 5 – Decide and Stage 6 - Implement (applicable to all airspace change proposals)

30 Do you agree or disagree that Stage 6 – Implement, should be merged into Stage 5 – Decide, retaining the current requirements of Stage 6?

Unsure

Please tell us why you have responded in this way:

Proposal 14: Outline the information the UKADS provider would be required to provide to stakeholders prior to any individual deployment (applicable to the UKADS provider sponsored airspace change proposals)

31 Do you agree or disagree that the guidance should outline the information the UKADS provider would be required to provide to stakeholders prior to any individual deployment?

Agree

Please tell us why you have responded in this way:

Updates enabling stakeholders to understand the steps to full implementation of the approved airspace change and temporary impacts they may experience would be in the interests of transparency.

32 What information would you want to know or consider a change should provide before a deployment takes place?

What information would you want to know before a deployment takes place?:

Information regarding new or intensified noise impacts over communities, and other environmental information relating to emissions.

Proposal 15: Remove the post implementation review and replace it with an airspace performance oversight process (applicable to all airspace change proposals)

33 Do you agree or disagree with our preferred option (option 1) to replace post implementation reviews with an oversight process to review the ongoing performance of UK airspace?

Disagree

Please tell us why you have responded in this way:

We strongly disagree with this proposal. Verifying that an airspace change has achieved the outcomes it was intended to achieve and has met any conditions it was subject to should be a fundamental part of the process. We support the CAA's proposal to set up a performance review programme for UK airspace but this should be additional to PIRs not instead of them.

Currently, if the implemented design does not satisfactorily result in the expected impacts and outcomes, the CAA has the authority to require the sponsor to modify the design or revert to the previous airspace design if modifications are not possible. The CAA has the authority to require a new ACP where implemented designs cannot be modified or reversed. Removing the PIR would be an unacceptable departure from the CAA's regulatory duty.

Alongside the PIR, the CAA should routinely set, and monitor the achievement of, environmental and community conditions which ensure that any asserted benefits are delivered fully and on a timely basis.

We are, however, surprised and disappointed that the CAA suggests this programme should be focused on the safety and efficiency of UK airspace. Whilst safety should clearly be a priority in any review, the other priority should be the environmental impacts of airspace usage. There are currently no incentives for airports or ANPS providers to propose changes that improve the noise environment for example. Consequently few have done so despite widespread acceptance that better noise outcomes could be achieved. Any performance review programme should focus on this issue not on capacity where there is a clear commercial incentive for sponsors to propose changes.

34 If an oversight process were established, do you think it should include a mechanism for stakeholder feedback on the performance of the airspace change?

Unsure

Please tell us why you have responded in this way:

Currently, sponsors must assess post-implementation stakeholder – including community stakeholder – feedback on the performance of the airspace design, which they are required to publish as part of the PIR. Following publication, stakeholders also have a 28 day window to provide feedback about whether the impacts of the change are as expected.

We do not agree that an oversight process should replace the PIR for the reasons set out above. Given that the purpose of the proposal to replace the PIR process with a new regulatory oversight process is driven by the wish “to shorten the airspace change process timeline and reduce resource requirements for the change sponsor”, it is reasonable to assume that stakeholder feedback opportunities would be limited. AEF’s members have expressed frustration about community feedback not being taken into account during the post-implementation process. In terms of noise impacts, communities bear the brunt of implemented airspace designs that don’t deliver on expectations of effective noise management. Community stakeholder feedback processes should be strengthened, not weakened.

35 Do you have any further views on what you would like to see included in a UK airspace oversight review process?

Do you have any further views on what you would like to see included in a UK airspace oversight review process?:

36 If post implementation reviews continue to be undertaken, do you agree or disagree that the data collection period could be reduced from 12 months following implementation?

Unsure

Please tell us why you have responded in this way:

One of the PIR tests should be whether the level of traffic using a route matches the level advised to stakeholders during the airspace change process and which formed the basis of the assessments. Changes in traffic may not be observable immediately, and may not be captured if the data collection is less than twelve months.

Proposal 16: Introduce a proportionate scaled process that enables conventional procedures that have been subject to RNAV Substitution (CAP 1781) and are already operational, to be replicated with fully Performance-based Navigation (PBN) compliant procedures (applicable to a pre-scaled airspace change proposal)

37 Do you agree or disagree with our proposal (option 2) that any procedure designed under CAP 1781 would need to undertake a Level 3 airspace change under CAP 1616?

Unsure

Please tell us why you have responded in this way:

Proposal 17: Develop a proportionate scaled process within CAP 1616 that would enable the establishment of short-duration volumes of segregated airspace for BVLOS (applicable to a pre-scaled airspace change proposal)

38 Do you agree or disagree that a process is required in uncontrolled airspace to facilitate low impact and short duration drone flights beyond visual line of sight (BVLOS)?

Unsure

Please tell us why you have responded in this way:

There is insufficient detail to make an informed judgement. The proposal is to “enable BVLOS UAS operations of low impact on stakeholders and of short duration”. However, you have not defined “low impact” or “short duration”.

In addition, we are concerned about potential cumulative impacts on other aircraft operating in uncontrolled airspace. The proposal, along with operational rules and a policy concept, has been developed with the DfT following consultation with Amazon and the NHS. [<https://www.caa.co.uk/drones/moving-on-to-more-advanced-flying/beyond-visual-line-of-sight-bvlos/#>]. There has been no consultation with other uncontrolled airspace users or with the public. As communities and businesses and clubs will be newly impacted, this is a serious omission. Where delivery drones operate in urban areas, noise impacts will not likely exceed background noise levels. However, in areas of low ambient noise, the noise impacts could be intrusive and annoying.

Amazon’s recent planning application for a Prime Air drone delivery service from its fulfilment centre in Darlington received considerable criticism. Several objections were raised about noise impacts, invasion of privacy (given that the drones must be fitted with cameras) and safety, while the Ministry of Defence raised concerns about possible conflict with its low-flying jets and tests.

Perhaps because of the lack of consultation with the public prior to the proposals, the impression is that the CAA is racing to accommodate BVTOLs without taking wider implications fully into account.

39 Do you agree or disagree that the CAA should establish this new process to facilitate this activity?

Unsure

Please tell us why you have responded in this way:

Please see our response to question 38

Migration policy: Migration from CAP 1616 version 5 to version 6 (applicable to CAP1616 version 5 airspace change proposals)

40 Please provide details of any key points you would like us to consider in the migration policy and process to ensure a smooth and efficient transition from CAP 1616 edition 5 to any updated airspace change process.

Please provide details of any key points you would like us to consider in the migration policy and process to ensure a smooth and efficient transition from CAP 1616: edition 5 to any updated airspace change process.:

Final call for views

41 Is there anything you think we have overlooked or not considered in these consultation proposals?

Is there anything you think we have overlooked or not considered in these consultation proposals?:

For the purposes of this consultation the CAA should have produced a non technical summary that outlined the reasons for and the implications of the airspace change process as well as the changes proposed. This should have been aimed at airport communities via a full spectrum of cross media advertisements with a built in monitoring exercise to determine effectiveness.