

Consultation on Guidance for Determining the Need for Air Traffic Services Provision

CAP 3300A

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Executive Summary

The Civil Aviation Authority (CAA) is seeking views on draft guidance that provides aerodrome operators with a process to assist them in determining whether air traffic services (ATS) are required at their aerodromes. This framework sets out the considerations necessary and process to follow to identify whether ATS provision is required and, if so, at what level in order to achieve an acceptable level of safety.

The draft reflects the objectives of the Airspace Modernisation Strategy which describes a clear understanding of the ATS level required at the aerodrome is required before the selection of an appropriate airspace structure.

The CAA invites aerodrome operators, air navigation service providers and users and other stakeholders to comment on the clarity and practicality of the proposed guidance.

CHAPTER 1

Purpose of this consultation document

Introduction

- 1.1 This document proposes the adoption of new guidance for aerodrome operators to support their compliance with requirements relating to the provision of air navigation services at an aerodrome that are appropriate to the level of traffic and the operating conditions at the aerodrome¹. This guidance focusses specifically on the aerodrome operator's considerations when determining the need for the provision of air traffic services (ATS).
- 1.2 The proposed guidance material (GM) addresses the UK's adoption of International Civil Aviation Organisation (ICAO) Annex 11² Standards and supports an aerodrome operator's compliance with applicable regulatory requirements by proposing the adoption of GM to:
- ADR.OR.C.005(b)(1) detailed within Annex III Part-ADR.OR to UK Reg (EU) No 139/2014;
 - Licensing of Aerodromes (CAP 168) Chapter 1, 1.25; and
 - Air Navigation Order (ANO) 2016 Article (Art.) 209(1).
- 1.3 In addition, the proposed GM may be of equal benefit to:
- (a) operators of unlicensed aerodromes that fall outside the scope of ANO 2016 Art. 209(1) and who may find the information useful to inform their management of the aerodrome.
 - (b) commercial air transport operators in ensuring that air traffic services appropriate to the airspace are used³ and that only aerodromes that are adequate for the type(s) of aircraft and operation(s) are used⁴; and

¹ The terminology here is taken from UK ADR.OR.C.005(b)(1). ANO 2016 Art. 209(1) and CAP 168 Chapter 1, 1.25 both refer to an aerodrome having 'adequate facilities', which includes in its meaning 'air navigation services'.

² Annex 11 *Air Traffic Services Fifteenth Edition*, including up to Amendment 54 dated 27 November 2025, Chapter 2, 2.4.

³ CAT.OP.MPA.100 contained in Annex IV Part-CAT to UK Reg (EU) No 965/2012 refers.

⁴ CAT.OP.MPA.105 and CAT.OP.MPA.107 contained in Annex IV Part-CAT to UK Reg (EU) No 965/2012 refer.

- (c) pilots-in-command when considering whether an aerodrome has adequate facilities for the safe conducts of flights for the purpose of flying instruction or testing⁵.

- 1.4 The proposed GM is contained within a separate document (Guidance for Determining the Need for Air Traffic Services Provision (CAP 3300)) attached to this consultation.

Why are we seeking feedback?

- 1.5 The Civil Aviation Authority (CAA) is seeking feedback to ensure that the proposed guidance is clear, proportionate and workable across diverse UK aerodromes. Your views will help confirm whether the guidance assists aerodrome operators, helping them to make consistent, risk-based decisions
- 1.6 Stakeholder input is essential to ensure the final guidance reflects operational realities and supports appropriate decision making by aerodrome operators. Responses will directly inform the refinement of the document prior to publication.

Why now?

- 1.7 Aerodrome operators are required to ensure the provision of air navigation services are appropriate to the level of traffic and the operating conditions at the aerodrome. Moreover, aircraft operators are required to ensure that the facilities and services (which includes air traffic services) at aerodromes are adequate for their needs; however, no guidance material exists to support operators in complying with these requirements. The CAA believes that addressing this omission will support operators in meeting their obligations, ensuring that operations remain safe and fit for purpose, while enhancing the quality and availability of data to inform risk-based oversight by the CAA (where applicable). This document is intended to provide guidance to aerodrome operators to support decisions on whether ATS should be provided, and at what level.
- 1.8 Feedback from stakeholders is requested to ensure that the guidance is accessible, clearly presented and sufficiently comprehensive to serve as a practical and reliable resource for aerodrome operators in their decision making.

Background

- 1.9 ATS play a critical role in maintaining safety, efficiency and an orderly flow of air traffic. The provision of ATS is covered in multiple documents both internationally and nationally, with ICAO Annex 11^{Error! Bookmark not defined.} placing a requirement upon Contracting States to determine 'those portions of airspace and those aerodromes where ATS will be provided'. However, till now, there has been no

⁵ ANO 2016 Article 209(2).

guidance provided to operators of certified or licensed aerodromes to assist them in determining when ATS should be provided at a given aerodrome and at what level. This document sets out the proposed approach for assessing that need, supporting safe operations, meeting compliance with international obligations and, in some cases, enabling oversight by the CAA.

- 1.10 The management of UK airspace, particularly in areas characterised by high-density and complex air traffic, presents unique challenges. This increasing complexity and the need for greater airspace efficiency all require appropriate levels of ATS to maintain safety while enhancing capacity, efficiency, and achieving the integration of new users. In this context, determining the appropriate level of ATS at aerodromes is essential to achieving an effective balance between operational flexibility and safety. Whilst operators of national licensed and certified aerodromes are required to ensure that the ATS or non-ATS function provided is appropriate for the nature of the operations conducted⁶, guidance material is required to assist them in making this determination. For those aerodromes that are unlicensed there is no such requirement, yet some limited guidance was published in 2010⁷ to assist them in determining whether the provision of ATS is necessary. Adoption of the proposed GM would result in the withdrawal of the 2010 content.
- 1.11 The development and delivery of guidance material on determining the need for the provision of ATS is a crucial component of the UK's Airspace Modernisation Strategy. It provides benefits to the aviation industry, supporting aerodrome operators in meeting their obligations, ensuring operations remain fit for purpose, and enhancing the quality and availability of data for risk-based oversight by the CAA (where applicable).
- 1.12 Whether an aerodrome is a farm strip, a helicopter landing site or a hard runway equipped airfield, the physical characteristics and operating standards in place should provide a safe operational environment.
- 1.13 Determining the need for the provision of ATS requires aerodrome operators, air navigation service providers (ANSPs) and the CAA to consider multiple factors, both quantitative and qualitative. As such, the decision-making process is complex and must include an element of judgement by subject matter experts.
- 1.14 The requirement to determine the need for the provision of air traffic services is defined within ICAO Annex 11^{Error! Bookmark not defined.} and requires consideration of the following:

⁶ UK Reg (EU) No 139/2014 Subpart C – Additional aerodrome operator responsibilities (ADR.ORC), ADR.OR.C.005 – Aerodrome operator responsibilities (b)

⁷ Chapter 9 of 'Safe Operating Practices at Unlicensed Aerodromes (CAP 793)' First Edition published July 2010.

- i. the types of air traffic involved;
- ii. the density of air traffic;
- iii. the meteorological conditions;
- iv. such other factors as may be relevant.

1.15 In determining the need for the provision of ATS, there is an associated requirement to identify the appropriate level of ATS, i.e. flight information service (FIS) or air traffic control service, for the nature of the operation being undertaken.

Regulatory Framework

- 1.16 The ICAO Global Aviation Safety Plan (GASP) is the global strategy for the continuous improvement of aviation safety and promotes the effective implementation of a state safety programme. This requires states to address their significant safety concerns (SSCs), with the UK identifying controlled flight into terrain (CFIT) and mid-air collision (MAC) amongst their SSCs; the provision of ATS is cited as a mitigation for both events. Therefore, it is important that operators can identify the appropriate level of ATS to help provide suitable mitigation for these concerns.
- 1.17 In the UK an 'aerodrome' means a defined area (including any buildings, installations and equipment) on land, water or on a fixed offshore or floating structure intended to be used either wholly or partly for the arrival, departure and surface movement of aircraft.⁸
- 1.18 This definition means that all areas used by aircraft, from basic farm strips to large commercial airports are considered aerodromes and are therefore covered by these proposals.
- 1.19 At certified aerodromes, the aerodrome operator is required to ensure the provision of air navigation services appropriate to the level of traffic and the operating conditions at the aerodrome. Point (b)(1) to ADR.OR.C.005 in Annex III Part-ADR.OR to UK Reg (EU) No 139/2014⁶, Aerodrome Operator Responsibilities states:
- The aerodrome operator shall ensure directly, or coordinated through arrangements as required, with the accountable entities providing the following services [...] the provision of air navigation services appropriate to the level of traffic and the operating conditions at the aerodrome.
- 1.20 The same requirements exist for licensed aerodromes that are regulated under CAP 168 (Licensing of Aerodromes). However, neither document provides details

⁸ UK Reg (EU) No 923/2012 Art. 2(6).

on what is considered the appropriate level of service, nor do they provide any guidance on how an aerodrome operator is to make this decision.

- 1.21 Additionally, ANO 2016 Article 209(1) states that ‘the operator of an aerodrome which is neither a national licensed aerodrome nor an EASA certified aerodrome must not permit and aircraft flying or intended to fly [for the purposes of flying instruction or testing] to take off from or land at their aerodrome unless satisfied on reasonable grounds that the aerodrome has adequate facilities for the safe conduct of such flights.’ Thus, those aerodromes where such training takes place should already be making an informed decision as to whether ATS is required to meet the required ‘adequate facilities for the safe conduct of such flights.’
- 1.22 There is also a requirement for commercial air transport operators to consider the provision of service when choosing to operate from an aerodrome.
CAT.OP.MPA.107 Adequate Aerodrome requires that:
- The operator shall consider an aerodrome as adequate if, at the expected time of use, the aerodrome is available and equipped with necessary ancillary services such as ATS, sufficient lighting, communications, weather reporting, navigation aids and emergency services.
- 1.23 Therefore, it is important that an aerodrome has appropriately assessed and selected their provision of ATS (or other function) and made that information available to enable operators to make their own decision on which aerodromes are appropriate for their needs.
- 1.24 These provisions are only applicable to licensed and certified aerodromes; however, where aerodromes are outside the scope of the listed regulatory requirements, irrespective of the type of aerodrome, it is still important to ensure that the physical characteristics and operating standards in place provide a safe operational environment. As such, this guidance material is also recommended for their use and supersedes the guidance currently provided in Chapter 9 of CAP 793 – Safe Operating Practices at Unlicensed Aerodromes
- 1.25 Details of the proposed document amendments is contained in the following chapter.

CHAPTER 2

Proposed Amendments

Introduction

- 2.1 To provide aerodrome operators with the appropriate guidance to assist them in their decision on whether, or not, to provide ATS and on the level of ATS provision, which is required, the following amendments and additions are proposed.
- 2.2 The text of the amendment is arranged to show deleted text, new or amended text as shown below:
- ~~Text to be deleted is shown struck through;~~
 - New text is highlighted in grey;
 - ~~Text to be deleted is shown struck through~~ followed by the replacement text which is highlighted in grey.
- 2.3 The symbol [...] is used to indicate that text has been omitted for the sake of brevity.

Certified aerodromes: UK Regulation (EU) No 139/2014

- 2.4 For aerodromes certified under UK Regulation (EU) No 139/2014, the CAA proposes new GM to ADR.OR.C.005 as follows:

Subpart C – ADDITIONAL AERODROME OPERATOR RESPONSIBILITIES (ADR.OR.C)

ADR.OR.C.005 Aerodrome operator responsibilities

[...]

- (b) The aerodrome operator shall ensure directly, or coordinate through arrangements as required with the accountable entities providing the following services:
- (1) the provision of air navigation services appropriate to the level of traffic and the operating conditions at the aerodrome; and

[...]

GM1 ADR.OR.C.005 (b)(1) Aerodrome operator responsibilities

Guidance to aerodrome operators on determining the appropriate level of air traffic services at an aerodrome is contained in 'Guidance for Determining the Need for the Provision of Air Traffic Services (CAP 3300).

GM2 ADR.OR.C.005 (c) Aerodrome operator responsibilities

Aerodrome operators should record their analysis and rationale for a determination on the appropriate level of air traffic services provision within their safety management system. Where appropriate, hazards should be identified and, where necessary, risks should be mitigated.

- 2.5 In addition, the following amendments are proposed to ensure that once the detail of the selected ATS is known, it is then included in appropriate documentation:

Subpart E – AERODROME MANUAL AND DOCUMENTATION (ADR.OR.E)

ADR.OR.E.005 Aerodrome manual

[...]

- (l) The content of the aerodrome manual shall be as follows:

[...]

- (5) Particulars of the operating procedures of the aerodrome, its equipment and safety measures.

AMC2 ADR.OR.E005 Aerodrome manual

AERODROME MANUAL

[...]

E. PART E – PARTICULARS OF OPERATING PROCEDURES OF THE AERODROME, ITS EQUIPMENT AND SAFETY MEASURES

[...]

30. Details of the air traffic service provided, including:

30.1 Type of air traffic service provided;

30.2 The hours of operation of the air traffic service and any associated limitations;

30.3 Any constraints or restrictions affecting the service provision;
and

30.4 The justification for the selected level of service, based on the aerodrome operator's assessment of the determinant factors relevant to the operation, including:

30.4.1 Nature of the operation;

30.4.2 Airspace environment; and

30.4.3 Aerodrome environment.

Licensed Aerodromes: CAP 168 – Licensing of Aerodromes

2.6 ANO 2016 Article 212 governs the grant of aerodrome licenses by the Civil Aviation Authority. The Article, together with Schedule 12, sets out the requirements for the aerodrome manual within the licensing process. An application for an aerodrome licence should be accompanied by an aerodrome manual produced in accordance with CAP 168. In order to meet these requirements and incorporate information on the decision to provide ATS, it is proposed that amendments are made to the following areas in CAP 168:

General Requirements for the grant of a licence

1.25 Before a licence is granted the CAA will require to be satisfied that the physical conditions on the manoeuvring area, apron and in the environs of the aerodrome are acceptable, and that the scale of equipment and facilities provided are adequate for the flying activities which are expected to take place. This includes evidence that the provision and level of air navigation services (including the provision of ATS) have been considered in line with the aerodrome SMS process and is appropriate for the level of operations expected.

[...]

Chapter 2 – The aerodrome manual

Air traffic services

2.29 Details of the following:

1. the system for the safe management of air traffic operating on the aerodrome or in the airspace associated with it¹;

¹ Where this is the provision of ATS, details should include the type of ATS (or non-ATS function) and hours of operation.

[...]

Unlicensed Aerodromes: CAP 793 – Safe Operating Practices at Unlicensed Aerodromes

- 2.7 CAP 793 provides information for unlicensed/all other aerodromes. It is proposed that Chapter 9 of CAP 793 is deleted in its entirety and replaced with a reference to Guidance for Determining the Need for Air Traffic Services Provision (CAP 3300). Whilst the content of CAP 3300 mainly relates to certified or licensed aerodromes, it can also be used by aerodrome operators at unlicensed aerodromes to assist them in understanding why they select a particular level of ATS and how they inform users of their airfield of the service provision and reasoning for selection.

~~Chapter 9 – Provision of Air Traffic Services~~

- ~~1 The provision of an air traffic service will depend on a number of factors. Aerodrome operators should consider the following:~~
- ~~a) The anticipated number of aircraft that will use the airfield.~~
 - ~~b) The movement rate including circuit traffic.~~
 - ~~c) The type of aircraft that will use the airfield, fixed-wing, rotary-wing, microlights, vintage jets, etc.~~
 - ~~d) The complexity of the operation – cross runway usage, etc.~~
 - ~~e) The proximity of other airfields and how that will affect the operation of the airfield.~~
 - ~~f) Local airspace and complexity.~~
- ~~2 Advice on Air Traffic Services (ATS) matters may be sought from the appropriate CAA Regional Manager, Air Traffic Standards.~~

CHAPTER 3

Engagement on draft guidance

Purpose of this consultation

- 3.1 This consultation seeks feedback to confirm that the draft guidance distributed in conjunction with this document is usable and sufficiently comprehensive to support aerodrome operators in determining whether there is a requirement for ATS provision at their aerodrome and, if so, at what level. The aim is to ensure the material is accessible, readable and fit for purpose before it is finalised.

Scope of this consultation

- 3.2 Respondents are invited to review the draft guidance and provide comments on its clarity, structure, completeness and practical applicability.
- 3.3 This consultation is limited to the presentation and usability of the guidance. It is not seeking views on the policy basis or regulatory requirements for provision or types of ATS. The guidance is not intended to imply when the CAA considers an ATS should be provided; rather, it aims to provide guidance to aerodrome operators who are responsible for making these decisions.

Conduct of this consultation

- 3.4 The consultation will be open until November 15 2026.
- 3.5 The consultation will be administered by email via the CAA's Consultation Hub on Citizen Space. Stakeholders are asked to submit their responses using the comment response document template provided.

Request for feedback

- 3.6 For ease of reference for stakeholders, a list of the questions is also included in Annex A.

Conclusion of the consultation

- 3.7 Once the consultation has ended, we will publish a short summary of consultation responses and how we have taken these into account as well as publishing a final version of the guidance.

CAA focal point

- 3.8 Stakeholders seeking clarification on the proposals detailed herein should contact Airspace & ATM Policy via email with the subject header 'Consultation on

Guidance for Determining the Need for Air Traffic Services' at
ATS.Enquiries@caa.co.uk

ANNEX A

Consultation Questions

The survey

Section 1 – Stakeholder information

The first part of the survey is intended to gather information on who is providing the survey response. Stakeholders will be offered the opportunity for their response to be published anonymously, otherwise your name and, if appropriate, organisation may be published alongside your response in our subsequent report.

Section 2 – Feedback

The next part of the survey asks a series of questions relating to the clarity, structure, completeness and practical applicability of the draft material.

- Are the structure and flow of the draft material logical and easy to follow? If no, please provide any suggested improvements.
- From your perspective, is any content omitted that you would expect to be included in guidance of this nature? If yes, please outline the areas you believe require inclusion.
- Are there any parts of the guidance that would benefit from additional explanation, context or elaboration to support a clear understanding of its intent and application? If so, please specify which areas and what further detail would be helpful.
- Is the draft material practically applicable to aerodrome operators considering whether the provision of ATS is required and the level of any such service if ATS is deemed necessary? If not, please explain any limitations or challenges you foresee.
- Do you have any further comments, observations or recommendations?