Safety and Airspace Regulation Group

NATIONAL AIR TRAFFIC MANAGEMENT ADVISORY COMMITTEE

MINUTES OF THE 98th PLENARY MEETING HELD AT AVIATION HOUSE ON 1 OCTOBER 2025

Present:

CHAIR

Jon Round	Head, Airspace, ATM & Aerodromes

REPRESENTATIVES OF MEMBER ORGANISATIONS

Tony Rapson	ACOG
Tim Thomas	AEF
Martin Robinson	AOPA
Rupert Dent	ARPAS-UK
Mike Gunston	BBAC
Pete Stratten	BGA
Tim Fauchon	BHA
Andrew McDonald	BHPA
Owain Johns	BMAA
Capt Spencer Norton	British Airways
Andrew Amor	GAA
Mike Pearson	GAA
Hal Newberry	HCAP
Jeremy James	HCGB
Flt Lt Ashley	MAA
Gp Cpt Toothill	MoD DAATM
Michael Cockcroft	NATS
Cdr Plenty	Navy Command HQ
Lt Cdr Shears	Navy Command HQ
Timothy Nathan	PPL/IR Europe

CAA STAFF

David Woodward	NATMAC Secretary
Colin Chesterton	Manager, Airspace Modernisation Delivery
Ben Lippitt	Manager, Airspace Regulation
Matthew Gee	Principal Airspace Regulator, Airspace Regulation
Akhil Sharma	Airspace Specialist (Engagement and Consultation)
Colin Scott	Senior Manager, UK Airspace Design Service
Maggie Pollard	Head of AMS Oversight
Jonathan Whitworth	Senior Manager AMS Development

INDEX TO NATMAC 98 MINUTES

ANNEXES:

NATMAC 98 MINUTES

1. ITEM 1 – INTRODUCTION

1.1 The **Chair** welcomed representatives to the meeting.

2. ITEM 2 – NATMAC 97 MINUTES

2.1 **Secretary** explained that the minutes of NATMAC 97 had been distributed to attendees and other Committee members prior to the meeting. In the absence of any comments, the **Secretary** advised the committee that the minutes for NATMAC 97 will be published on the NATMAC CAA webpage.

3. ITEM 3 – ACTION LIST FROM NATMAC 97 AND MATTERS ARISING FROM PROGRESS REPORT

3.1 The **Secretary** stated that two actions had been carried over from NATMAC 96 and six actions were raised at NATMAC 97, all of which have been closed off. The actions are documented in the progress report that was sent out ahead of the meeting.

3.2 The **Secretary** invited feedback/comments from the committee on the actions in the Progress Report. No comments or feedback raised.

4. ITEM 4 – CHAIR'S REPORT

4.1 **Chair** presented on the Chair's Report which had been distributed prior to the meeting.

4.2 No comments or questions were raised.

5. ITEM 5 – AIRSPACE MODERNISATION DELIVERY TEAM UPDATE

5.1 **Colin Chesterton** presented on the Electronic Conspicuity (EC) Concept of Operations (ConOps).

5.2 **Pete Stratten (BGA)** asked who is going to fund the ground infrastructure proposed in the EC ConOps and stated that it is difficult for organisations to feed into consultations when it is not clear how the ground infrastructure might exist in reality. For example, if the ground infrastructure element does not get funded, and therefore does not happen, then what happens to the rest of the ConOps that is built upon ground infrastructure? **Colin Chesterton** explained that EC alone gives benefits in the air-to-air environment but that there is still some work to be done on understanding ground infrastructure and that there is not a one size fits all solution to it. The CAA is now working with the Department for Transport (DfT) into looking at the costs involved in delivering ground infrastructure and where those costs might fall.

5.3 **Andrew McDonald (BHPA)** stated that many members of the BHPA took advantage of the grants offered to purchase EC devices in previous years. Those devices included ADS-L and FLARM, amongst others. The struggle is now to convince people that the devices they bought should be replaced by another form of EC (ADS-B) and asked if extra funding would be available for people to buy ADS-B. **Colin Chesterton** explained that the funding was provided by DfT, and that the CAA just administered the scheme on its behalf. Conversations regarding the EC mandate include costs involved to all airspace users, however at present there is no definitive answer to the question raised. **Chair** explained that 80% of those that used the grant scheme purchased ADS-B with a minority purchasing other forms of EC. Furthermore, notice will be given as to when any mandate would take effect, and any change will not be instantaneous. There will inevitably come a time where one standard is settled upon which is why the CAA signposted this some time ago. **Andrew McDonald (BHPA)** stated that the BHPA fully supports the EC position that the UK is taking but convincing some users to adopt an EC device different to the one they already use may be difficult. Clear communication from the CAA is essential.

5.4 **Colin Chesterton** presented on the Electronic Conspicuity (EC) Mandate.

5.5 **Martin Robinson (AOPA)** asked when the studies that were conducted by Baringa that sit behind the EC position papers would be published. **Colin Chesterton** explained that publishing them was difficult because of the number of diagrams that the studies contained however the Committee can email EC@caa.co.uk to request them on an individual basis.

5.6 **Pete Stratten (BGA)** asked via what mechanism did the Department for Transport (DfT) request the CAA to investigate how a mandate could be introduced. **Colin Chesterton** explained that the request came from the area of the DfT that works with BVLOS and that it was submitted via a Section 16 request to establish how such a mandate might benefit the Future of Flight programme. **Pete Stratten (BGA)** explained that there are economic challenges to recreational general aviation to an EC mandate and that this must be made clear to the CAA to feed it back to the DfT. The change is being driven by new entrants into the market and therefore those new entrants should be funding the mandate. In Europe, the primary driver of an EC mandate is mid-air collision avoidance whereas in the UK the primary driver in the UK is the integration of BVLOS operations, therefore it is clear to the BGA that the BVLOS industry should be paying for this. **Colin Chesterton** explained that the CAA will try to balance the needs of general aviation users in this work.

5.7 **Andrew McDonald (BHPA)** stated that there does not appear to be a joined-up approach to the mandate between the CAA and the military. The biggest threat to BHPA members in the low-level environment is military aircraft that cannot receive the EC device that the paraglider or hang glider is using. **Cdr Plenty (Navy Command HQ)** explained that the timeline is crucial particularly for the Royal Navy that has ageing air systems that do not have ADS-B. The cost-benefit needs to be known before the military will embark on equipping airframes with costly integrated ADS-B systems as the out of service date of some airframes may precede the AMS. Future programmes need to know what the mandate is and what the ConOps are telling us technically so that the military can put that into the requirements for future air systems specifications that must be applied. The primary concern is the timeline as mentioned above, however the exemptions also need to be carefully considered as there will be requirements for the military to turn off ADS-B when flying operationally or transiting between sites. This needs to be fed through DAATM early

in the process to ensure that future platforms are covered. **Colin Chesterton** explained that DAATM is part of discussions on this topic with almost weekly meetings taking place between DAATM and the CAA.

5.8 **Colin Chesterton** presented on Ground Infrastructure Introduction.

5.9 **Martin Robinson (AOPA)** asked how the ground infrastructure will be paid for. **Colin Chesterton** explained that the ConOps is aimed at scoping what ground infrastructure would look like and that conversations have started between the CAA and DfT regarding funding. The CAA will not make the decisions regarding funding but will draw up the options. **Martin Robinson (AOPA)** stated that the decision related to funding will have an impact on the ConOps itself and asked why the CAA is consulting on it now without having answered where the funding will come from. **Colin Chesterton** stated that there are benefits from EC in relation to air-to-air uses which can be drawn out of the ConOps. **Chair** explained that the AMS is a long-term project that has areas that require an iterative approach. The CAA had to make a start on the ConOps which will then be reissued once comments have been considered. The consultation must be published to receive feedback and there will be more opportunities to add further feedback when more is known on the topic.

5.10 **Colin Chesterton** presented an update on PinS/GNSS Approaches.

5.11 **Tim Fauchon (BHA)** stated that these approaches were supposed to be “quick wins”, however they were delayed with the facilitation team being disbanded and many sponsors are having to go back to the start of the process to progress the applications, often using charity money to fund the work, due to a change in policy. **Colin Chesterton** explained that the facilitation team was established to get sponsors to the application stage of the process. It was acknowledged that the process did take longer than first anticipated due to resource challenges, however progress is now being made.

5.12 **Colin Chesterton** presented a brief on the Future ATM/ANS programme.

5.13 **Mike Pearson (GAA)** acknowledged that the CAA has settled on ADS-B, however implementation times are stretching out towards 10 years. Is the CAA considering what new technologies may come along in the future as the UK may end up in a position where one form of suitable EC is mandated now but is not suitable in the future. **Colin Chesterton** explained that the CAA is currently looking at what the new technologies might be, such as mobile phone networks. The level of maturity of these technologies is still at least 10 years away, with the FAA conducting research in this area. The current CAA plan is focussed on the short to medium term with ADS-B but is looking at the next phase of technology.

5.14 **Andrew McDonald (BHPA)** stated that he was not aware that the CAA had settled on ADS-B as the EC standard. **Colin Chesterton** explained that the CAA position had been that ADS-B was the future technology since 2017. Other forms of EC are not being discounted, and operators can still use FLARM or other forms of EC, however the position of the CAA has been that ADS-B will be the preferred standard for a long time. **Andrew McDonald (BHPA)** asked why the CAA allowed funding to be used for other forms of EC other than ADS-B. **Chair** explained that the funding came from DfT and that it would not allow the CAA to stipulate what form of EC the funding could be used for. FLARM still proves useful for the gliding community for what it wants to use it for. The CAA tried to signpost as clearly as it could that ADS-B was the preferred option for the future.

5.15 **Pete Stratten (BGA)** opined that there may be confusion within the general aviation community as many see what is happening in the EU with regards to EC, which is fundamentally different to what the UK is doing. The EU us leading on collision avoidance as well as integration, whereas the UK focus is integration. The funding provided by DfT has increased the use of EC and has helped to reduce midair conflict. **Chair** agreed that EC has helped in this regard and that many people within the general aviation community supports the implementation of EC. **Pete Stratten (BGA)** agreed that most of the general aviation community is in support of EC, however the details in how it is to be delivered is what matters. Aircraft owners and pilots will have to use their own money to fund the devices to comply with the requirements for EC.

5.16 **Andrew McDonald (BHPA)** stated that the CAA needs to make it clear in communications that ADS-B is to be the EC standard from whichever date is decided upon, and that it is new news that ADS-B has been decided upon as the standard. The BHPA has 7,000 members which may need to fund new devices whilst owning two devices to comply with both the UK standard and the standard in other European countries. **Colin Chesterton** agreed that communication will be key. **Cdr Plenty (Navy Command HQ)** agreed that communication is essential as any programme of work to get devices onto aircraft and onto the frontline could take 10 years to implement.

5.17 **Hal Newberry (HCAP)** stated that EC often brings the most discussion from the most members of the committee. The questions raised primarily focus on other technologies, therefore a request was made that the CAA presents on the reasons why the other technologies are being discounted in favour of ADS-B. The rationale behind the decisions being made by the CAA would assist the committee. **Colin Chesterton** stated that discussions such as that have happened in the past however a refresher into why those decisions were made could be useful for a future meeting.

Action: Colin Chesterton

5.18 **Andy McDonald (BHPA)** asked **Pete Stratten (BGA)** what the BGA's view is relating to carrying two EC devices such as FLARM and an ADS-B device. **Pete Stratten** explained that this has been known about for some time and that the BGA is focussed on ensuring that the level of a mandate is proportional and to establish who is going to pay for the EC equipment and ground infrastructure. The BGA strongly agrees with the European position of using ADS-L, however the BGA will work towards the UK plan. **Colin Chesterton** explained that the EASA position is ADS-L, however some EASA starts have approached the CAA with interest in how it is focussing on the use of ADS-B for integration.

5.19 **Rupert Dent (ARPAS-UK)** asked if the update to C2 link explained in the presentation is likely to affect any of the existing policies that are already being worked on. **Colin Chesterton** agreed to meet with the SMEs in C2 link to answer that question.

Action: Colin Chesterton

5.20 **Martin Robinson (AOPA)** stated his understanding was that for SORA to be effective it is essential to know what is operating the airspace. How does the CAA plan to get general aviation users to notify of activity in airspace so that SORA can be effective? **Colin Chesterton** explained that SORA places the emphasis on the

operator to notify of activity, not general aviation pilots. For example, if the operation is in Class G airspace, then the baseline assumption is that general aviation will be operating there and that will feed into the SORA assessment. **Martin Robinson (AOPA)** asked if there is a plan for all flights to be notified in the future. **Colin Chesterton** explained that the AMS points towards flight notification being a good idea however there is nothing currently pointing towards mandating all flights to notify. **Colin Chesterton** agreed to ascertain if there are any plans to mandate this in the future.

Action: Colin Chesterton

5.21 **Colin Chesterton** presented an update on airspace infringements.

5.22 **Hal Newberry (HCAP)** asked if the reduction in airspace infringements could be related to a reduction in the number of flights or hours flown. **Colin Chesterton** explained that the CAA does not have the data on the number of flights taken or hours flown. **Hal Newberry (HCAP)** asked if it is possible to obtain this metric to measure the rate of infringements versus hours flown. **Colin Chesterton** asked **Secretary** (former Airspace Infringement Specialist) if this work has already been done or if this is something that can be explored. **Secretary** explained that a piece of work was completed in 2024 to investigate if it was possible to obtain a reliable dataset as to the number of hours flown per year by all aircraft. This work concluded that there were too many variables and unknowns to assure the data, however the Infringements Team does ask Local Airspace Infringement Team (LAIT) members if they are seeing a reduction in flying year on year. Most report that demand is steady and, in some cases, increasing, however exact numbers are not known. **Chair** further explained that this has been investigated several times, and that the data is difficult to collate. It is also easy to get fixated on the total numbers, however reporting culture improving could result in more reports which is not necessarily a bad thing. Furthermore, the severity of the events is the more important metric, and the data tends to point towards fewer severe events than in the past. A further important metric is the number of pilots that are repeat infringers, therefore have been through the infringement process in the past, and to establish why they have infringed again. **Hal Newberry (HCAP)** asked if the data on repeat infringements can be shared with the Committee. **Secretary** agreed to obtain this data and share it with the Committee.

Action: Secretary

5.23 **Timothy Nathan (PPL/IR)** asked why infringements of danger areas which don't have a statutory instrument associated with them are still counted as infringements. In Europe, pilots can access danger areas as long as they are aware of them, so why does the UK do it differently? **Colin Chesterton** agreed to speak with the Principal – Airspace Infringements to provide an answer to this.

Action: Colin Chesterton

5.24 **Cdr Plenty (Navy Command HQ)** asked if the statistics in the presentation that show military airspace infringements is military aircraft infringing airspace or of infringements of military airspace such as SUAs. **Secretary** confirmed that is the number of infringements by military aircraft in the UK.

6. ITEM 6 – AIRSPACE MODERNISATION OVERSIGHT UPDATE

6.1 **Jonathan Whitworth** presented on AMS Development Part 1, Part 2, Part 3, and PCP.

6.2 **Martin Robinson (AOPA)** stated that under the AMS, access to some airspace could be declined if not suitably equipped, therefore reducing the amount of Class G airspace available to such aircraft and creating two areas of airspace, one that has known traffic and one that has unknown traffic. Furthermore, it is not clear how this will be addressed. Is the AMS being driven by commercial aspirations and environmental needs? Benefits should be delivered to all airspace users. **Jonathan Whitworth** explained that the AMS is about the totality of the system meaning that all users will need to be able to operate in the new environment with some areas being more constrained but others having more freedoms. It could be that as some of the ACPs are progressed, some areas may become accessible to users that were not accessible before. The changes must be fair, pragmatic, and equitable to all users. **Martin Robinson (AOPA)** stated that access to some of the airspace will depend on aircraft being visible and therefore there is an expectation that an air traffic service will be provided. Presently, that does not happen, but under the AMS it is important to ensure that pilots can obtain a service in Class G airspace when visible. There is currently no mention of that in the AMS documents. **Jonathan Whitworth** explained that being conspicuous does not necessarily mean that an aircraft must have a service, for example pilots can currently fly in Class G, with a transponder, and not be in receipt of a service.

6.3 **Cdr Plenty (Navy Command HQ)** stated that his understanding was that the UK was moving towards ICAO FIS with FIS-B and TIS-B supporting this. **Jonathan Whitworth** explained that the CAA is looking to better align with the provisions in ICAO relating to FIS. There is nothing in ICAO that says exactly what FIS must contain, but the series of provisions state what States may do to meet the defined standard. The AAA Airspace Policy Team is currently looking at the provision of FIS. **Timothy Nathan (PPL/IR)** explained that FIS is very unified in Europe despite flexibility in the ICAO model with the UK being an outlier. This causes airspace infringements in the UK by non-UK licenced pilots, which was highlighted in the airspace infringement presentation earlier in the meeting. **Jonathan Whitworth** explained that the way FIS is provided in the UK is currently well established and that the CAA must have consideration for the training requirements of both airspace users and the providers of the service. The AMS may change the way airspace is used, therefore some airfields, such as military airfields, that currently have ATZs and MATZs may have Class D and E volumes of airspace which changes how the services are provided. **Timothy Nathan (PPL/IR)** explained that the United States provides FIS in a very different way to Europe and the UK despite the ICAO provisions. Also, in Europe, the provider of FIS can establish if a military zone is being used and, if it is not, clear aircraft through it. This system works better than the UK system.

6.4 **Maggie Pollard** presented on AMS Oversight – annual progress report & LSSIP.

6.5 No comments or questions were raised.

6.6 **Colin Scott** presented an update on Air Navigation Guidance and UKADS.

6.7 **Pete Stratten (BGA)** asked for an example of activity that could be undertaken by UKACS that is outside the scope of UKADS. **Colin Scott** explained that the scope of UKADS is the London TMA cluster, however there are other clusters such as Manchester and Scottish that currently sit with ACOG. Those functions will be subsumed under UKACS. **Pete Stratten (BGA)** opined that the update showed a difference to what was included in the consultation for UKADS, with the update suggesting that multiple ACPs will now be under the umbrella of NERL. **Colin Scott** explained that there is still the originally phased approach to UKADS that was consulted on, whereas UKACS is designed to streamline the process in a similar way to ACOG. **Pete Stratten (BGA)** stated that the BGA agrees with the concept of UKADS but voiced concern that NATS is a corporation that is answerable to its shareholders and therefore may not have the interests of all airspace users at heart. **Jonathan Whitworth** explained that there will be a consultation for UKACS and that is planned for release soon. **Colin Scott** explained that the presentation is showing a proposal rather than a final plan.

6.8 **Cdr Plenty** asked about the timeline relating to Tranche 1 and Tranche 2. **Colin Scott** explained that Tranche 1 is out, and Tranche 2 is the future documents that are still being worked on. **Jonathan Whitworth** stated that the timelines is likely to be winter for Tranche 2.

6.9 **Martin Robinson (AOPA)** asked how NERL will cover the costs for airspace design under UKADS. Will it be from an increase in the en-route charge? How will the non-airline users of airspace be protected from costs? **Colin Scott** explained that the cost model was included in the original proposal, and the final proposal will include the final cost model. That will explain the costs relating to the UKADS delivery of service. There is no intent that there will be a cost to general aviation. **Martin Robinson (AOPA)** voiced concern over the establishment of more controlled airspace which will increase pressure on general aviation, and that there are concerns that NATS will start to charge general aviation for UKADS in the future. **Colin Scott** explained that this project is subject to consultation. **Martin Robinson (AOPA)** opined that consultation doesn't mean a great deal and that it is usually a foregone conclusion. **Chair** stated that consultation gives a relatively clear direction of proposals and then challenged the statement that there is likely to be a growth in controlled airspace, explaining that in some areas there could a reduction of controlled airspace with an increase in more efficient flight profiles.

7. ITEM 7 – TRAs AND TSAs WITHIN CONTROLLED AIRSPACE / AIP IMPROVEMENT WORKING GROUP BRIEF

7.1 **Matthew Gee** presented a briefing on the work undertaken with CAP 3096 to create compliant airspace designs within controlled airspace, as well as work being undertaken by the AIP Improvement Working Group (AIWG).

7.2 **Pete Stratten (BGA)** suggested that the process could change the functionality of the airspace and LoA, for example by establishing a TSA, and therefore could change how aircraft operate in them. How can all parties assure that the airspace

continues to operate as it does today and that everyone has an equal voice in the process to amend the airspace. **Matthew Gee** explained that the CAP 3096 states that the CAA does not envisage any change in how aircraft operate in the airspace. The ruleset already applied as per the LoA would then apply as a TRA if this was considered to be the right airspace structure to employ, or unless the operators deemed that the current arrangement needed changes. If the sponsor considers the operation safe, then the current ruleset would be applied to the new ICAO/SERA compliant airspace structure. **Pete Stratten (BGA)** asked why the CAA cannot do the work with NATS instead of the users of the airspace? **Matthew Gee** explained that the airspace is best considered by those that operate in it, and not the CAA. This gives the airspace users the opportunity to amend procedures if they do not currently work for the users.

7.3 **Andrew McDonald (BHPA)** asked if there is funding available for volunteer organisations such as the BHPA? **Matthew Gee** explained that the CAP 1616 process is the mechanism to change airspace in the UK. CAP 3096 has scaled back the CAP 1616 process as far as possible to make the pathway to compliance easier and more manageable for those that do not wish to change procedures or agreements. The process should not be onerous or complicated, and that the items to be considered are in the CAP. **Pete Stratten (BGA)** said that the alignment with ICAO is understood, but that it appears that the CAA is passing the problem to the airspace users because exemptions have been given by the CAA in the past to operate under LoA. **Matthew Gee** explained that exemptions exist throughout aviation for temporary periods but once there is a compliant way of carrying out the activity the exemption cannot remain and alignment with legislation must take place. **Pete Stratten (BGA)** asked why the CAA cannot adopt the proposed policy for any future agreements rather than requiring the existing ones to change. **Matthew Gee** explained that law changed under SERA and exemptions were given with the intent of removing them when compliant airspace structures were accepted and that the process proposed in CAP 3096 does not require a large amount of work to make the existing structures compliant. **Chair** explained that there is support available from the CAA to complete this work.

7.4 **Mike Pearson (GAA)** stated that the case study example shown does not look at a specific example and does not include an estimate of costs which would be helpful. There is a cost associated to airfields and operators which is causing concern. Is money from the AMS Support Fund available to cover the costs of this work?

7.5 **Andrew McDonald (BHPA)** asked if the CAA could present to the BHPA on the process required for the Stansted LoA so that can be used as a framework for the other LoA that involve the organisation.

Action: Matthew Gee

BREAK FOR LUNCH

8. ITEM 8 – ACOG BRIEFING

8.1 **Tony Rapson** provided an update on ACOG activities.

8.2 There were no comments or questions raised.

9. ITEM 9 – CAP 1616 CONSULTATION

9.1 **Ben Lippitt** presented a briefing on the work undertaken as part of the CAP 1616 review consultation.

9.2 **Rupert Dent (ARPAS-UK)** stated that it would be useful to track the statistics related to TDAs, particularly those imposed at short notice, so that there is data collected on how the airspace structures are being used, how frequently they are being used, and what the impact is. **Ben Lippitt** explained that this relates to airspace that is established under security grounds or by D&D for emergency use and agreed to look into providing some statistics on this.

Action: Ben Lippitt

9.3 **Pete Stratten (BGA)** asked how the CAA plans to ensure that sponsors engage early in the process to establish stakeholder needs prior to designing airspace proposals. Under the potential changes to CAP 1616, the requirement for an early gateway to ensure sponsors were engaging has been removed. **Ben Lippitt** explained that this check will still be done by the CAA but later in the process, however the CAA will detail the expectations of sponsors early in the process. The risk will lie with the sponsor if it does not engage appropriately.

9.4 **Pete Stratten (BGA)** asked if the removal of a PIR would relate to Level 1 ACPs only or would it apply to all three? **Ben Lippitt** explained that the removal would apply to all three. **Pete Stratten (BGA)** opined that a PIR can act as a tool to ensure that change sponsors act appropriately throughout the entire change process as they know that the change will be reviewed. **Ben Lippitt** explained that there is still the need for a mechanism to make amendments to airspace changes to accommodate unforeseen issues post-implementation. One proposal is rather than a PIR that acts as a snapshot in time, the CAA conducts ongoing oversight of the airspace which would allow for changes in requirements as time progresses. **Pete Stratten (BGA)** stated that process would need to be a statutory requirement to which **Ben Lippitt** agreed.

10. ITEM 10 – AIRSPACE CHANGE PROPOSAL UPDATE

10.1 **Ben Lippitt** provided an update on all ongoing airspace change proposals.

10.2 No comments or questions were raised.

11. ITEM 11 – AOB

11.1 **Martin Robinson (AOPA)** acknowledged the survey released by the CAA on Position, Navigation, and Timing (PNT), as well as the vulnerabilities of GNSS. Will the CAA bring the topic to NATMAC? **Chair** welcomed discussion on the issue but stated that the expectation is that EGNOS will not be brought back any time soon. **Martin Robinson (AOPA)** asked how PNT will replace EGNOS in the future? **Chair** agreed to investigate the topic and feed the findings back to the Committee.

Action: Chair

11.2 **Michael Cockcroft (NATS)** stated that there have been occurrences involving the MoD performing jamming and spoofing which has impacted commercial traffic. Is this something that should be constrained to TRAs to minimise the impact on commercial traffic considering the reliance on GNSS for navigation. **Chair** explained that the CAA is aware of the activities and that uncertainty remains relating to the impact of the jamming, but that few incident reports are received relating to the activity. **Michael Cockcroft (NATS)** explained that there were some aircraft that lost navigation capability over Wales related to GNSS jamming and spoofing. **Capt Spencer Norton (BA)** explained that jamming makes the aircraft lose the signal whereas spoofing makes the aircraft believe it is somewhere else. **Chair** explained that it is well known to the airlines and that standard operating procedures exist to manage the loss of GNSS. The UK impact is low compared to other areas of the world. **Ben Lippitt** stated that it is unlikely to be spoofing in the UK as any activity must go through a process to be approved.

11.3 **Chair** explained that a lot of activity is planned prior to the next Committee meeting and that it would be useful to have a short one-hour meeting prior to April to provide updates.

12. ITEM 12 – DATES OF FUTURE MEETINGS

- NATMAC 99 – 15th April 2026
- NATMAC 100 – 7th October 2026

NATMAC 98 – ACTION LIST

Actions arising from NATMAC 98

5.17	**Hal Newberry (HCAP)** stated that EC often brings the most discussion from the most members of the committee. The questions raised primarily focus on other technologies, therefore a request was made that the CAA presents on the reasons why the other technologies are being discounted in favour of ADS-B. The rationale behind the decisions being made by the CAA would assist the committee. **Colin Chesterton** stated that discussions such as that have happened in the past however a refresher into why those decisions were made could be useful for a future meeting.	**Colin Chesterton**
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5.22	**Hal Newberry (HCAP)** asked if the reduction in airspace infringements could be related to a reduction in the number of flights or hours flown. **Colin Chesterton** explained that the CAA does not have the data on the number of flights taken or hours flown. **Hal Newberry (HCAP)** asked if it is possible to obtain this metric to measure the rate of infringements versus hours flown. **Colin Chesterton** asked **Secretary** (former	

	Airspace Infringement Specialist) if this work has already been done or if this is something that can be explored. **Secretary** explained that a piece of work was completed in 2024 to investigate if it was possible to obtain a reliable dataset as to the number of hours flown per year by all aircraft. This work concluded that there were too many variables and unknowns to assure the data, however the Infringements Team does ask Local Airspace Infringement Team (LAIT) members if they are seeing a reduction in flying year on year. Most report that demand is steady and, in some cases, increasing, however exact numbers are not known. **Chair** further explained that this has been investigated several times, and that the data is difficult to collate. It is also easy to get fixated on the total numbers, however reporting culture improving could result in more reports which is not necessarily a bad thing. Furthermore, the severity of the events is the more important metric, and the data tends to point towards fewer severe events than in the past. A further important metric is the number of pilots that are repeat infringers, therefore have been through the infringement process in the past, and to establish why they have infringed again. **Hal Newberry (HCAP)** asked if the data on repeat infringements can be shared with the Committee. **Secretary** agreed to obtain this data and share it with the Committee.	**Secretary**
5.23	**Timothy Nathan (PPL/IR)** asked why infringements of danger areas which don't have a statutory instrument associated with them are still counted as infringements. In Europe, pilots can access danger areas as long as they are aware of them, so why does the UK do it differently? **Colin Chesterton** agreed to speak with the Principal – Airspace Infringements to provide an answer to this.	**Colin Chesterton**
7.5	**Mike Pearson (GAA)** stated that the case study example shown does not look at a specific example and does not include an estimate of costs which would be helpful. There is a cost associated to airfields and operators which is causing concern. Is money from the AMS Support Fund available to cover the costs of this work? **Andrew McDonald (BHPA)** asked if the CAA could present to the BHPA on the process required for the Stansted LoA so that can be used as a framework for the other LoAs that involve the organisation. **Chair** agreed to note the request.	**Matthew Gee**

9.2	**Rupert Dent (ARPAS-UK)** stated that it would be useful to track the statistics related to TDAs, particularly those imposed at short notice, so that there is data collected on how the airspace structures are being used, how frequently they are being used, and what the impact is. **Ben Lippitt** explained that this relates to airspace that is established under security grounds or by D&D for emergency use and agreed to look into providing some statistics on this.	**Ben Lippitt**
11.1	**Martin Robinson (AOPA)** acknowledged the survey released by the CAA on Position, Navigation, and Timing (PNT), as well as the vulnerabilities of GNSS. Will the CAA bring the topic to NATMAC? **Chair** welcomed discussion on the issue but stated that the expectation is that EGNOS will not be brought back any time soon. **Martin Robinson (AOPA)** asked how PNT will replace EGNOS in the future? **Chair** agreed to investigate the topic and feed the findings back to the Committee.	**Chair**

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NATMAC 98 – GLOSSARY

(This Glossary is not necessarily limited to acronyms used in these Minutes, but is intended to assist members with the variety of NATMAC correspondence promulgated)

AAA	Airspace, ATM & Aerodromes
ACOG	Airspace Change Organising Group
ACP	Airspace Change Process
ADS-B	Automatic Dependent Surveillance – Broadcast
ADS-L	Automatic Dependent Surveillance – Light
AIP	Aeronautical Information Publication Administrative Incentive Pricing (spectrum)
AIMWG	Aeronautical Information Management Working Group
ANSP	Air Navigation Service Provider
AIWG	Airspace Infringement Working Group
AMS	Airspace Modernisation Strategy
ATM	Air Traffic Management
ATWP	Air Transport White Paper
ATZ	Aerodrome Traffic Zone
AWG	Airlines Working Group
BVLOS	Beyond Visual Line of Sight
CMIC	Civil/Military Interface Committee
DMO	Delivery Monitoring and Oversight
DfT	Department for Transport
DGCA	Director General of Civil Aviation
EASA	European Aviation Safety Agency
EHS	Enhanced Mode S
ELS	Elementary Mode S
ECAST	(EASA) European Commercial Aviation Safety Team
EGAST	(EASA) European General Aviation Safety Team
FAA	Federal Aviation Authority
FAB	Functional Airspace Block
FAB EC	Functional Airspace Block Europe Central
FASI	Future Airspace Strategy Implementation
FFC	Future Flight Challenge
FIS	Flight Information Service
FUA	Flexible Use of Airspace
GAWG	General Aviation Working Group
HMT	His Majesty's Treasury
ICAO	International Civil Aviation Organisation
IFP	Instrument Flight Procedures
LARS	Lower Airspace Radar Service
LSSIP	Local Single Sky Implementation

MATZ	Military Aerodrome Traffic Zone
NATS	National Air Traffic Services
NPA	Notice of Proposed Amendment (EASA)
NSA	National Supervisory Authority
PinS	Point in Space
PPR	Planned and Permanent Redistribution of air traffic
PRC	EUROCONTROL Performance Review Commission
PRNAV	Precision Area Navigation
PSSTG	Public Sector Spectrum Test Group
RPAS	Remotely Piloted Aircraft System
RMZ	Radio Mandatory Zone
RICBAN	Regulatory Information and Co-ordination Board Area North-West
SARG	Safety & Airspace Regulation Group (CAA)
SASWG	Spectrum & Surveillance Working Group
SBAS	Satellite-Based Augmentation System
SES	Single European Sky
SES IR	SES Implementing Regulation
SESAR	Single European Sky ATM Research Project
SESAR JU	SESAR Joint Undertaking
SSC	Single Sky Committee
TDA	Temporary Danger Area
TMZ	Transponder Mandatory Zone
UAM	Urban Air Mobility
UAS	Unmanned Aircraft Systems
UAV	Unmanned Aerial Vehicle
UKADS	UK Airspace Design Service
UTM	UAS Traffic Management
WRC	World Radio Conference

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National Air Traffic Management Advisory Committee (NATMAC) Meeting

NATMAC 98 Wednesday 1st October 2025

NATMAC 98 Agenda

- **10:00 - Meeting Start / Introduction**
- 10:05 – Minutes of NATMAC 97
- 10:10 – Action List / Progress Report
- 10:15 – Chair's Report
- 10:30 – Airspace Modernisation Delivery Team Update
- 11:15 – Airspace Modernisation Oversight and UKADS Update
- **12:00 – Coffee break**
- 12:15 – TRAs and TSAs within Controlled Airspace / AIP Working Group Brief
- 12:35– Airspace Change Organising Group (ACOG) Brief
- **12:55 – Lunch break**
- 13:40 – CAP 1616 Consultation
- 14:00 – Airspace Change Proposal Update
- 14:20– AOB
- **14:30 – Wrap Up**

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Actions List/Progress Report

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Chair’s Report

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Electronic Conspicuity – Technical project

Setting the EC standard for interoperability between manned aircraft, and Specific Category BVLOS UAS

Initial EC Concept of Operations

Drivers

AMS Elements

UK FUTURE OF FLIGHT

UK-ABN/4. Integration

UK-ABN/7. Future surveillance and spectrum.

Purpose

- ✓ Industry baseline
- ✓ Initial reference of policy direction.
- ✓ Framework for how tech, procedures & systems are expected to operate.
- ✓ Basis for public consultation, allowing industry to contribute to the development.
- ✓ Safety Assurance developed in parallel.
- ✓ Early guidance material to trial operators.

Content

- ➢ 9 positions: setting out Technical requirements, Equipage standards, Operational usage.
- ➢ Amalgamation of findings from series of in -depth studies; recent & legacy.
- ➢ Primary aims:
  - ○ enhancing manned aircraft situational awareness;
  - ○ enabling detect -and-avoid for Unmanned Aircraft Systems (UAS).

*Public Consultation now live.

978 MHz Licenced

Con Ops Iterations

1 Public Consultation * 2 Trials – Phase 1 3

Training Requirements Finalised

Trials – Phase 2

EC Policy Changes to support BVLOS Ops (Firm AMC for EC)

2025				2026				2027				2028			
Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4

ConOps / Consultation | Develop Policy Changes | Enact Policy Changes | Continued EC Innovation

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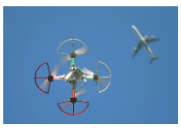
Electronic Conspicuity – Technical project

Setting the EC standard for interoperability between manned aircraft, and Specific Category BVLOS UAS



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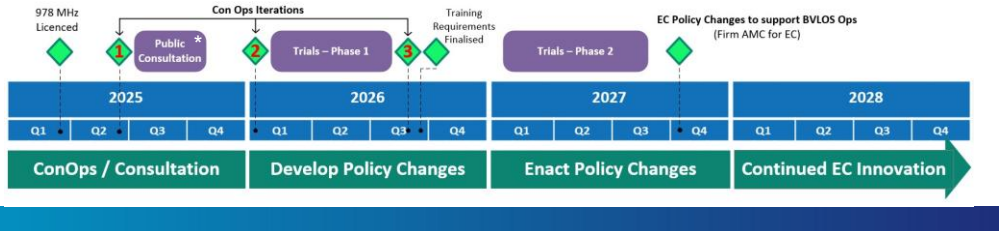

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Electronic Conspicuity (EC) Mandate

DfT has asked the CAA to explore the options on how a UK -wide EC mandate could be introduced.

To support this, we are assessing the potential impacts on industry, government, the CAA and wider society. Specifically, we are:

Considering both the technical safety and economic benefits

Drawing on expertise from across the CAA and external partners

Engaging regularly with key partners and stakeholders:

- Industry (GA, RPAS, ANSPs, Airfields, others).
- Joint & Integrated partners (MoD/DAATM and NATS).
- Government departments: DfT, DSIT, UK Treasury, RIO.

The scoping phase is due to be completed in October 2025 and will be followed by a validation and engagement period to shape the final recommendations.

This is a complex policy area. Timings remain uncertain, but clearer direction is expected by late 2026 / early 2027.

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What is Ground Infrastructure?

Ground Infrastructure may be required to underpin the use of Electronic Conspicuity to support BVLOS operations in some circumstances, as well as providing additional inputs and validation , to pass data between systems and for this to be achieved in a safe and efficient manner.

GI is a term that encompasses several technologies:

- **ADS-B/ UAT Sensors** – Detect transmissions from Manned and Unmanned Aircraft operating BVLOS .
- **MLAT** – Provides independent validation of ADS -B derived position and allows Mode S only position to be established.
- **Obstruction Beacons** – Highlights areas of Unmanned Aircraft Swarms / Manned aircraft that cannot be EC equipped
- **Traffic Information Service – Broadcast -** Allows broadcast of different EC protocols where required (e.g. terrain shielding)
- **Data Feeds to Flight Information Displays etc** – Provides Air Traffic units situational awareness of Manned Aircraft and BVLOS
- **Optical Detection** – Potential additional means of highlighting non -conspicuous UA to Air Traffic
- **RF Detection** – Potential additional means of highlighting non -conspicuous UA to Air Traffic – Possibly tied to NRiD
- **ADS-B Validation –** Provides aircraft operators a means of validating their EC devices are functional

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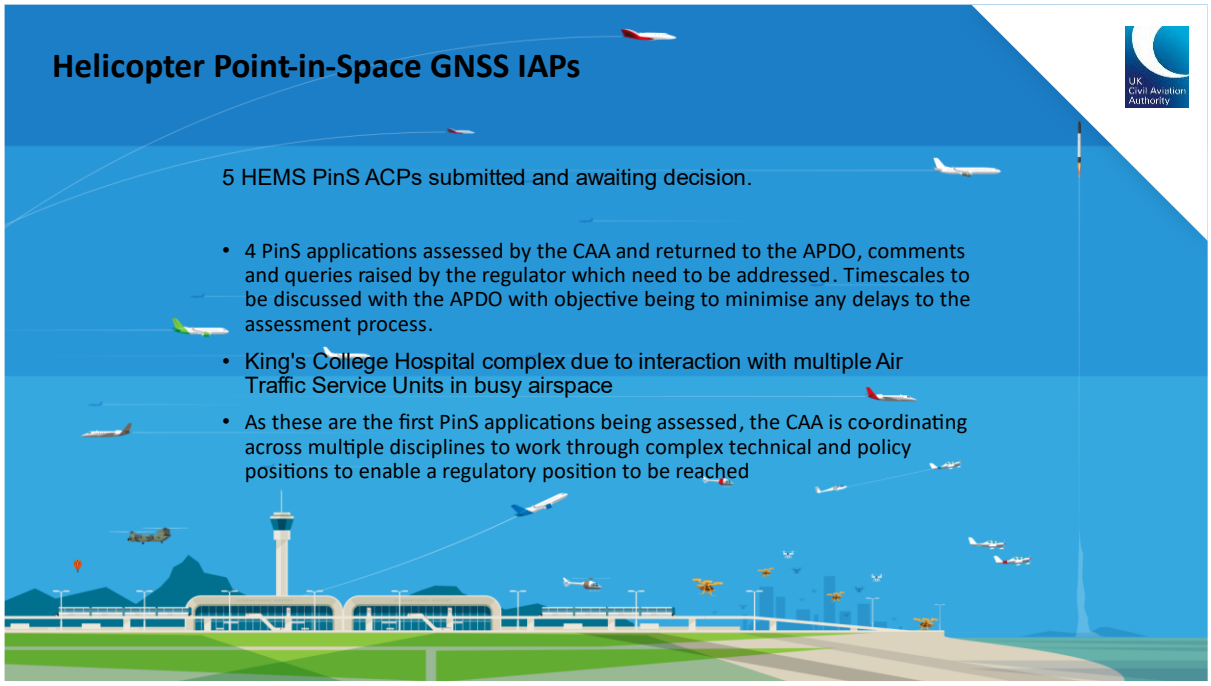

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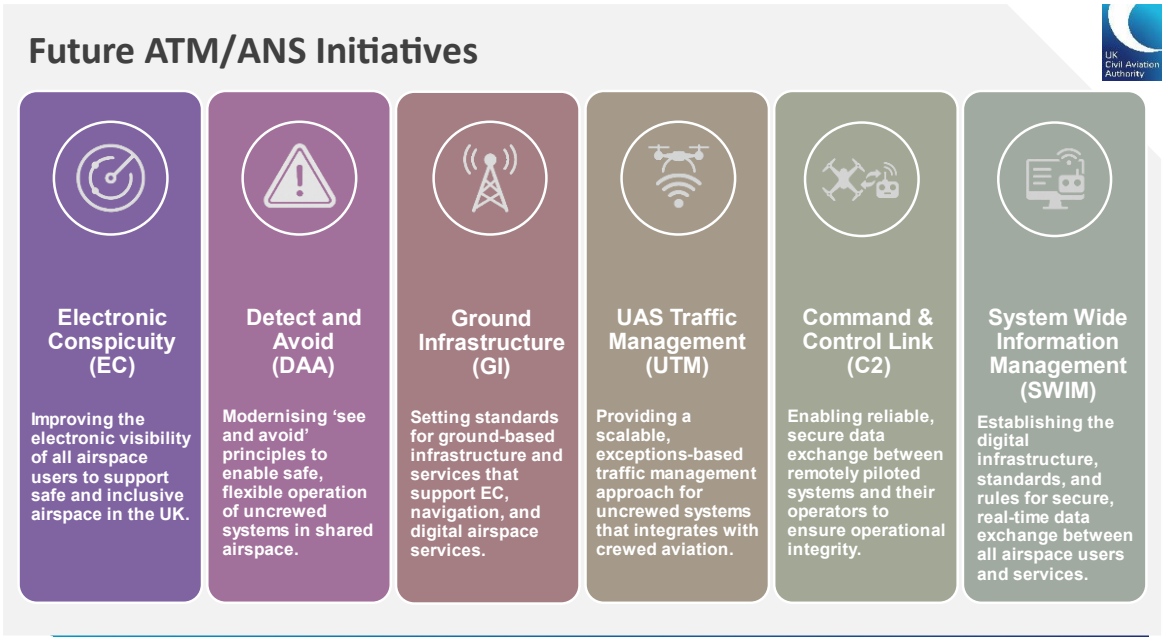

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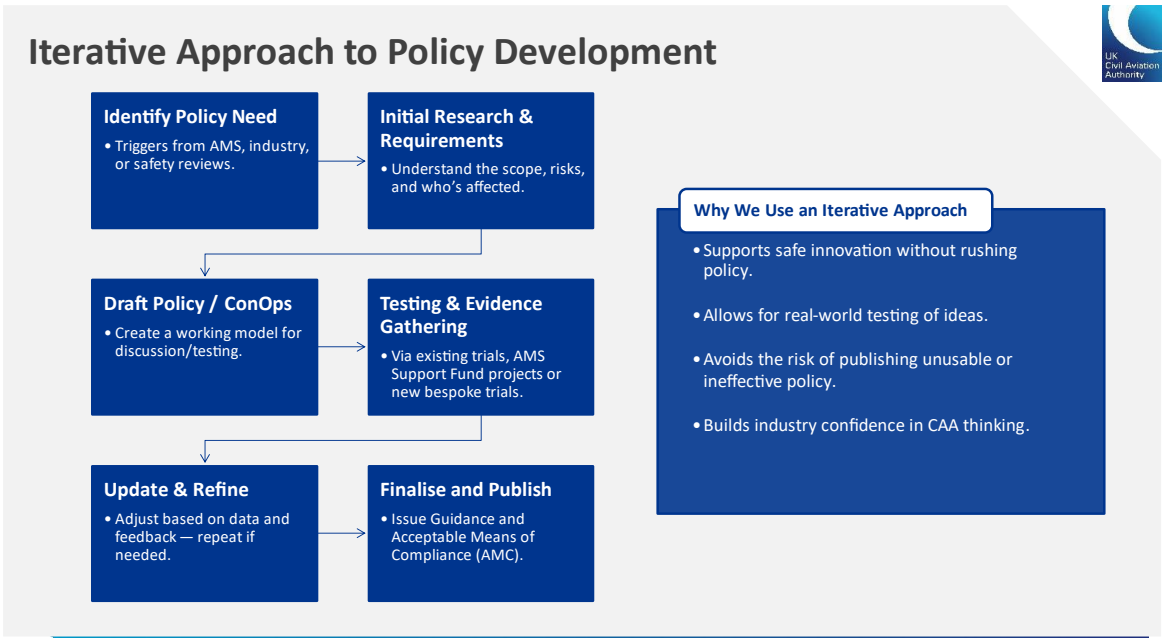

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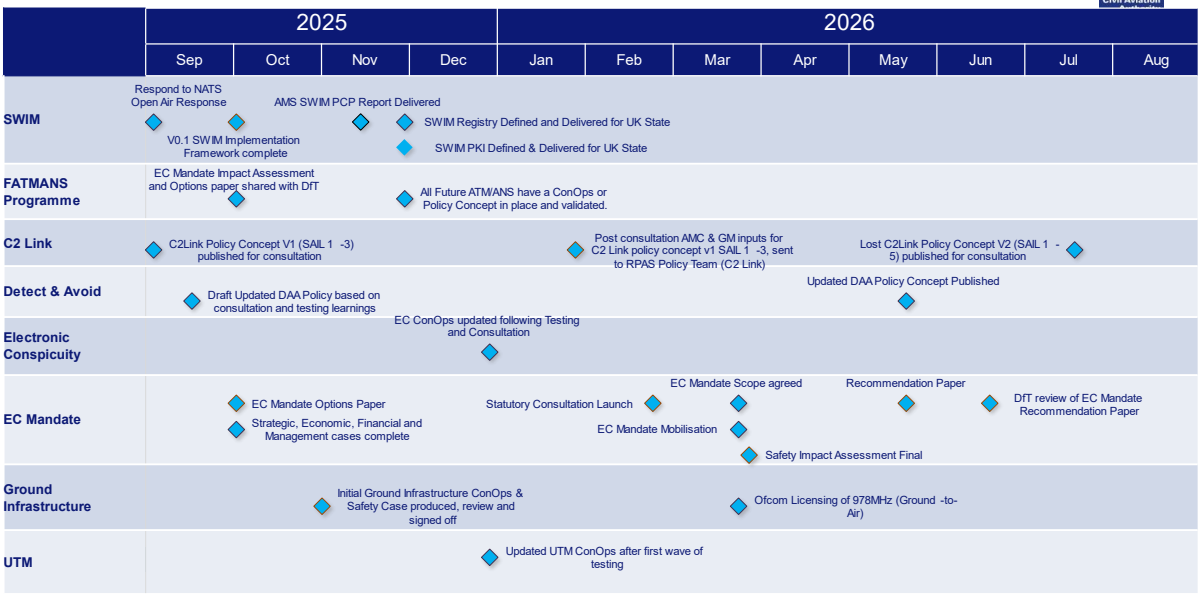
Future ATM / ANS & SWIM: 12month Look-ahead

Key upcoming Future ATM/ANS & SWIM milestones



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Key Updates

Electronic Conspicuity (EC)

- Consultation is live until 06 October – responses are still welcome from those who haven't yet submitted.

Detect and Avoid (DAA)

- Work continues on the next iteration of the policy concept, shaped by consultation feedback and early findings from industry trials already securing regulatory approvals.

Ground Infrastructure (GI)

- The ConOps is undergoing internal review ahead of external sharing later this year / early next year.
- Engagement with Ofcom is underway to validate the operational and technical requirements for 978 MHz ground-to-air licences and define the scope of any required studies.

Uncrewed Traffic Management (UTM)

- Awaiting further feedback from industry partners to progress the ConOps.
- Rulemaking workstream to enable certification has begun, with planning underway and key policy groups now established.

C2 Link

- Consultation will launch on Monday 29 September.

System Wide Information Management (SWIM)

- An initial ConOps for new entrants, focused on the interaction between ATM and UTM, has been drafted and will soon begin internal review.

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Publication: 29 Sept *tbc*

C2 Link policy concept consultation

What does the document say and why is it important to receive industry feedback?

The *C2 Link Policy – External Consultation* document has the following structure with the following intent:

Chapter 1	Introduction	Chapters 1-4 set the context for SAIL 1 -3 C2 Link Related annexes provide some more thoughts Some questions asking for feedback
Chapter 2	Regulations and standards	
Chapter 3	Technical options	
Chapter 4	Use cases	
Chapter 5	Lost C2 Link	Placeholder, noting that updates will be provided in due course
Chapter 6	SORA OSOs and C2 links	Provides nine proposals in relation to the CAA's use of existing telecoms standards and guidelines relating to UK SORA OSO6 and OSO13 and seeks feedback on these

The consultation also suggests some 'nudges' regarding technology use for C2 Link and the requirements between lower SAIL (1 to 3) and higher SAIL (4 & 5+) activities

It aims to build towards a consensus on which telecoms standards are relevant to C2 Links in specific category UAS using UK SORA

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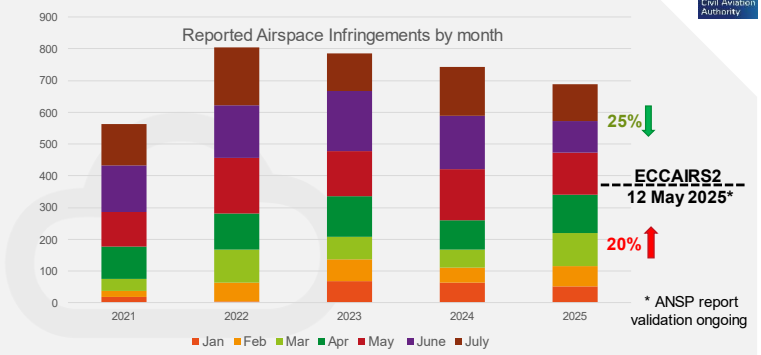
UK Airspace Infringements: to 31 July 2025

Year	Number
2021	1057 (564)
2022	1384 (875)
2023	1231 (785)
2024	**1158** (744)
2025	**(699)**

-6%

-6%



Safety Impact: Reported Loss of Separation (LOS) / Safety Intervention Measures (SIMs)

To 31 July 2025, 25.9% of AI involved at least 1 LOS/SIM

(To 31 July 2024, 28.9%)

Individual instances ÷ total AI reports received	Losses of Separation	Avoiding action	Radar Vectors & Stops in climb/ descent	Stop of Departures	Check on departures	Traffic Information
To 31 July 2025	5.15%	7.29%	9.87%	3.43%	2.86%	6.44%
To 31 July 2024	4.70%	5.78%	11.15%	2.15%	2.82%	7.12%
Trend	↑	↑	↓	↑	↑	↓

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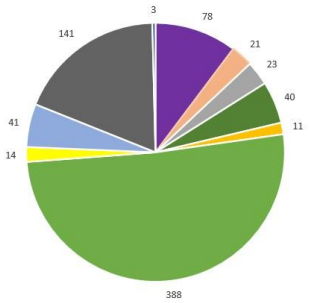
CAA Post-infringement Action: to 16 September 2025

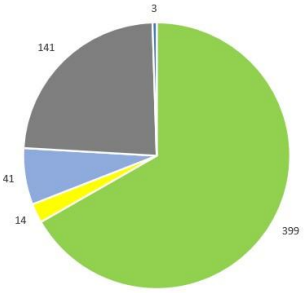
760 cases reviewed

Military	40	5.26
Student	11	1.45
Education Letter	388	51.05
Online Tutorial & Test	14	1.84
Practical Training	41	5.39
AIAC	141	18.55
Provisional Suspension	3	0.39
	760	**100**



Education Letter	399	66.7
Online Tutorial & Test	14	2.3
Practical Training	41	6.9
AIAC	141	23.6
Provisional Suspension	3	0.5
	598	**100**

By Decision - Pilot Slip/Lapse as Root Cause



Airspace Infringement Strategy Update

- Use of Airspace Analyser tool to assist in dentification of hotspots
- Take 2 and TEM VFR Moving Maps
- FMC for Teesside
  - Reissue AIC(Y) 111/2023, Media article, Aide memoirs
- LAIT Actions:
  - Wessex – Farnborough CTA-1 / Fairoaks
  - Stansted – Pink AIC for North Weald
  - London – Graphic wrt LFA risk
- AI briefings:
  - ANSP – Southend
  - FI (A) & (H) seminars
  - GA pilots
    - 4 done
    - 6 requested/pending
- Attendance at trade shows/GA events
  - Sleapkosh
  - LAA Rally

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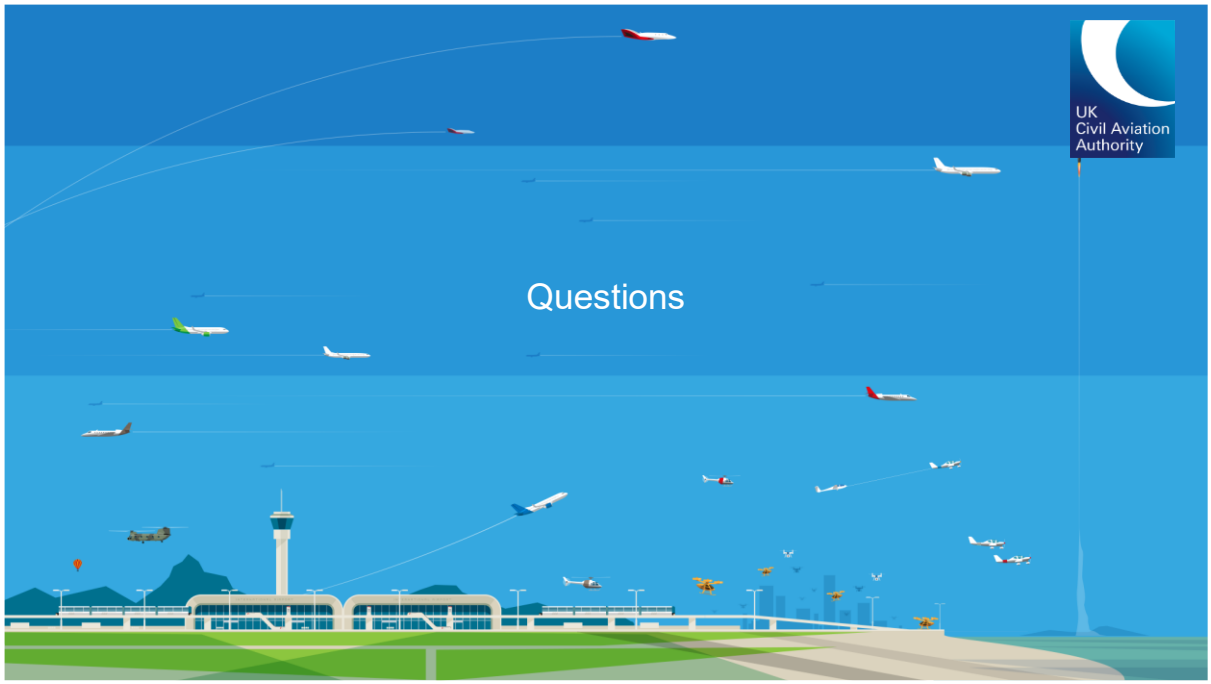

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Airspace Modernisation Strategy Update

AMS Publications

- AMS Part 3 Edition 2 (CAP 1711b) released Aug 25.
  - Edition 3 will commence drafting Nov 25 to be published summer 26.
- Planning on when/how to review AMS Parts 1 & 2 (CAP 1711/1711a) ongoing.
  - Anticipate Edition 2 work to commence late Q2 26 – changes to And/ANG may bring this forward.

Pilot Common Project (PCP) – Analysis/Review

- Challenges around the requirements set in the PCP and the associated impacts to ANSPs/Industry.
  - Upcoming deadlines in Dec 25.
- CAA undertaking work to understand and manage the issue.
  - Looking at options and legal framework for change – legislation slot, Letter of Assurance & future options

UK Airspace Coordination Services (UKACS)

- Evolution of Masterplan concept alongside the introduction of UKADS to pick up residual major airspace changes.
- Autumn 25 consultation on the scope of the residual co -ordination service, with the aim of maintaining change momentum outside the UKADS area of responsibility, simplifying processes and expediting decision making.

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Airspace Modernisation Oversight

AMS Support Fund

Call for Proposals Open

Since the first project was approved in 2021, £9.8m has been invested in completed and ongoing projects
In total, there have been 28 projects funded under the AMS Support Fund. 15 are ongoing, 13 have completed. Application window closes on the 15th October.

2024 Annual Progress Report

Published 15th September 2025 (*www.caa.co.uk/CAP3084*)

Progress achieved All nine AMS elements advanced in 2024, with key milestones delivered (AMS Part 3 Deployment Plan, new policy concepts, Time-Based Separations at Heathrow); however, six remain amber and three red.
Key challenges Dependency risks (NATS Deployment Point En Route programme), high-risk areas in Terminal Airspace Redesign and Data Services, ongoing resource/funding pressures, and the need to maintain alignment with ICAO/European plans.

2025 Annual Progress Report

Reporting Cycle Commenced

Chapters of the report are now being developed, documenting progress made between January and December 2025, with an aim of publishing the full report on the 1st April 2026.
We welcome NATMAC members to provide feedback on airspace modernisation progress, impact, engagement, risks, benefits and issues, relevant to the reporting period, by Monday 1st December 2025, on airspace.modernisation@caa.co.uk Indicative status update for Q3 has been provided.

2025 LSSIP Report

The UK remains the member of the **European Civil Aviation Conference (ECAC)** and **EUROCONTROL** and is committed to the Local Single Sky Implementation Plan process, which feeds into European and global ATM reporting frameworks. LSSIP and the UK's Airspace Modernisation Strategy are aligned with ICAO's Global Air Navigation Plan. The CAA's Airspace Modernisation Oversight team is managing reporting to draw on efficiencies under both the UK and European reporting. LSSIP is not optional but **a core requirement of the UK's EUROCONTROL and ECAC membership** and a key enabler of international aviation alignment. It protects the UK's role in shaping the European ATM network, ensures interoperability with global standards, and delivers operational efficiency. That is why the CAA must ensure reporting is accurate, robust, and reflects the UK's position while supporting long term strategic and operational goals.

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AMS Delivery Progress 2025 – Q3 Status Update

AMS Delivery Elements	Lead	Target Date	Status vs. Last Year	Update
UK-ABN/2. Terminal airspace redesign	ACOG	Q4 2030	→	The Scottish TMA passed their Stage 3 gateway and consultation activities underway. North - West cluster continues to experience delays for various reasons (e.g., CAP1616 Gateways not progressed, funding & resource constraints, etc.). London Airspace South further delayed Stage 3 Gateway until Jan 2026. West TMA delays due to lack of ATCOs for design workshops. LTMA awaiting transition and UKADS onboarding.
UK-ABN/3. Network management	NERL	Q3 2026	→	NATS (En Route) plc deployed Gatwick Advanced Mixed Mode in Q1 2025. Arrival Manager Headbranch deployment onto standalone hardware servicing Terminal Control at Heathrow and Gatwick delayed to Q1 2027.
UK-ABN/1. Trajectory-based operations	NERL & UK CAA	Q4 2027	↓	This delivery element is delayed due to dependencies on NATS (En Route) plc's technological change programme - DP En Route. Free Route Airspace is expected by Q4 2030, but benefits depend on NERL's new Flight Data Processing system (iTEC SkyNex), due 2035. PBN work progressing well and all milestones remain on track. Point in Space delivery delayed until mid 2026.
UK-ABN/4. Integration	UK CAA	Q4 2027	→	Lower Airspace Concept: Research & activity scoping continues and development of draft guidance material and recommendations paper ongoing re: requirement and policy for determining the areas where air traffic services are provided and the designation and design of airspace to support that provision. Other workstream delivery dates to be decided.
UK-AM/5. Airspace management	UK CAA	Q4 2038	→	Continual development of existing airspace management tools is taking place to increase flexibility and efficiency by expanding access to operators of Special Use Airspace (SUA). This also aims at improving information exchange and interoperability with neighbouring States. Lower Airspace Concept has been paused due to resourcing issues. All other FUA work is on track.
UK-AM/6. Data services	NERL & UK CAA	Q4 2034	→	The NATS (En Route) plc's technological change programme DP En Route continues to face delays . Recovery plan uses iTEC V2 with the existing Medium Term Conflict Detection toolset to reduce risk to service disruption. The System Wide Information Management (SWIM) framework milestones and delivery dates confirmed. Two milestones made need revising post PCP review. AIM: Definition of delivery of UK datasets on track for Q4 2025. Delivery dates as yet unconfirmed for UK SWIM services and digital charts.
UK-AM/7. Future surveillance and spectrum	UK CAA	Q1 2030	→	The UK CAA are analysing existing infrastructure for resilience and rationalisation, including the Global Navigation Satellite System (GNSS) and Performance Based Navigation (PBN). Work is continuing the development of Minimal Operational Requirements (MON) and what this must deliver as per AMS.
UK-AM/8. Integration of communications, navigation, surveillance and spectrum	UK CAA	Q4 2035	→	
UK-AM/9. Aircraft capabilities	UK CAA	Q1 2031	→	The UK CAA presented a paper on behalf of the European States and EUROCONTROL at the International Civil Aviation Organization 14th Air Navigation Conference, to further the international discussion and build consensus on Air Navigation Priorities for Safe and Efficient Integration of Higher Airspace Operations and the Transit of Space Operations. The Higher Airspace Operations Group's activities increasing from September including starting to put together the concept paper which the group will be supporting (as highlighted in the Part 3). Members of the group will be participating in the ECHO 3 project which is being scoped in Europe at the moment through SESAR.

Baseline:
CAA – AMS Part 3 v2 2025;
ACOG – MPL IT2;
NERL – SIP NR23

Attention required Progressing at risk Progressing to plan

A trend indicator: ↑ Progress is getting **worse;** severity is trending up

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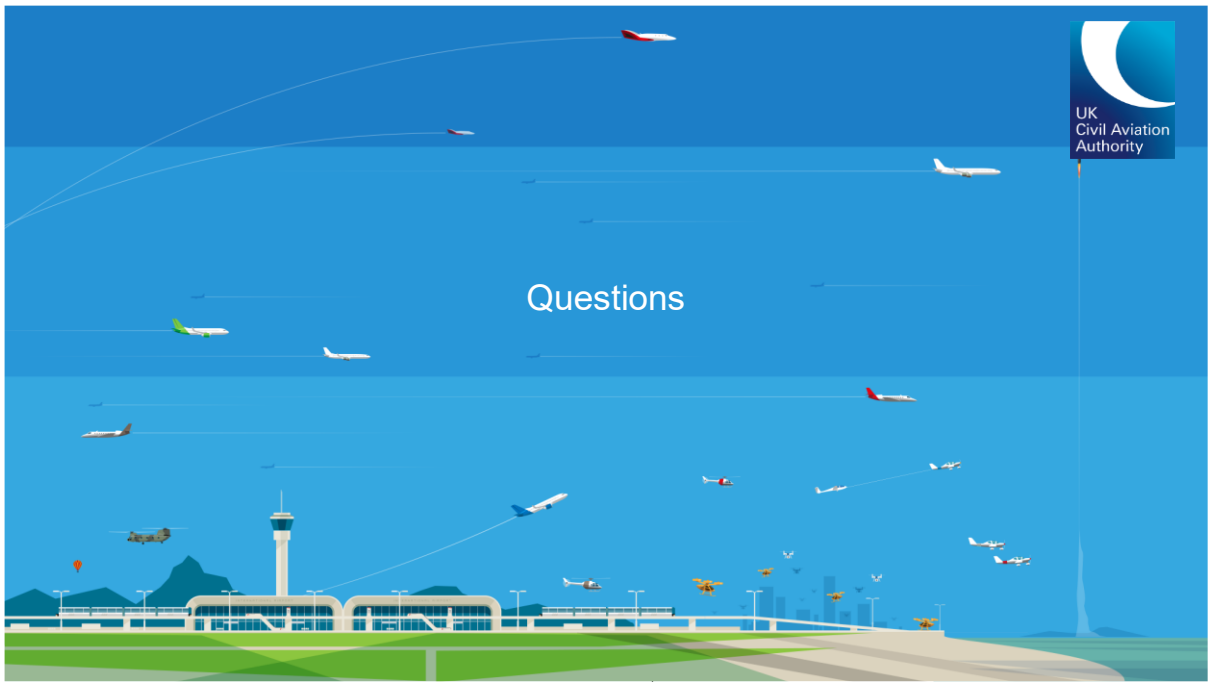
↓ Progress is getting **better;** severity is trending down → Progress is **steady**



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Progress since NATMAC 97

Department for Transport

- CAA consultation on Initial Proposals for changes to NERL licence – June 2025
- Statutory Instruments laid July 2025 – came into force 15 August 2025.
- CAA published Onboarding paper (CAP3129) on 1 September 2025.
- DfT consulted on proposed modification to terms of the licence.
- CAA consultation on proposed changes to CAP1616 – 25th September for 12 weeks.
- Creation of a bespoke webpage to capture all detail related to UKADS - useful-links-related -to-the-ukads

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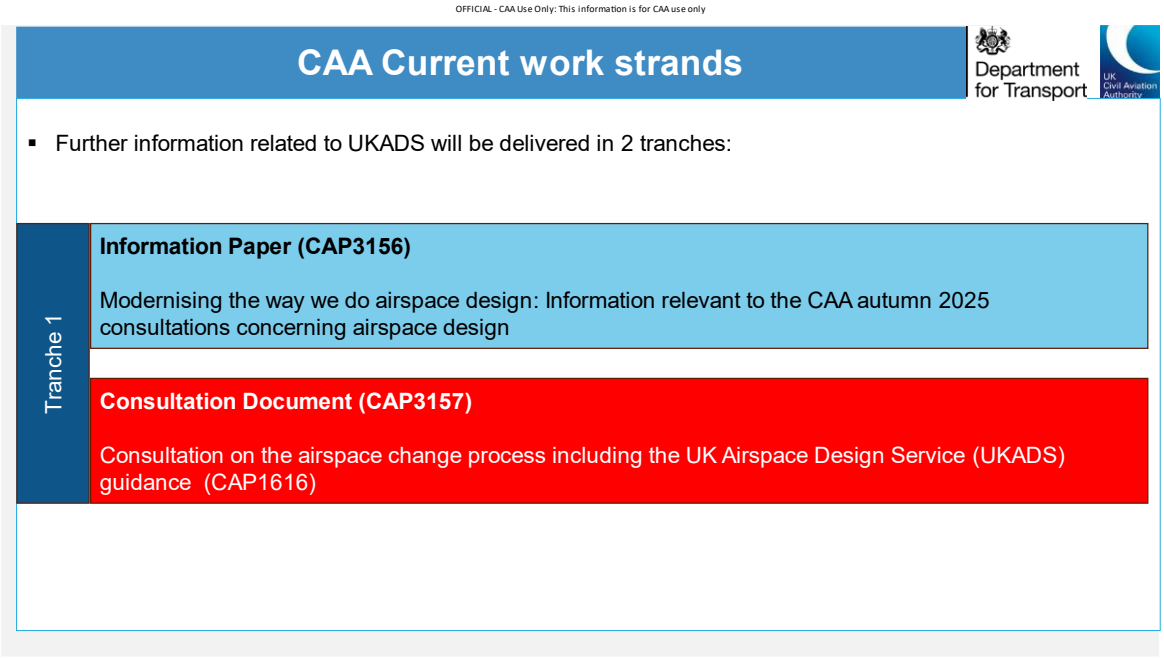

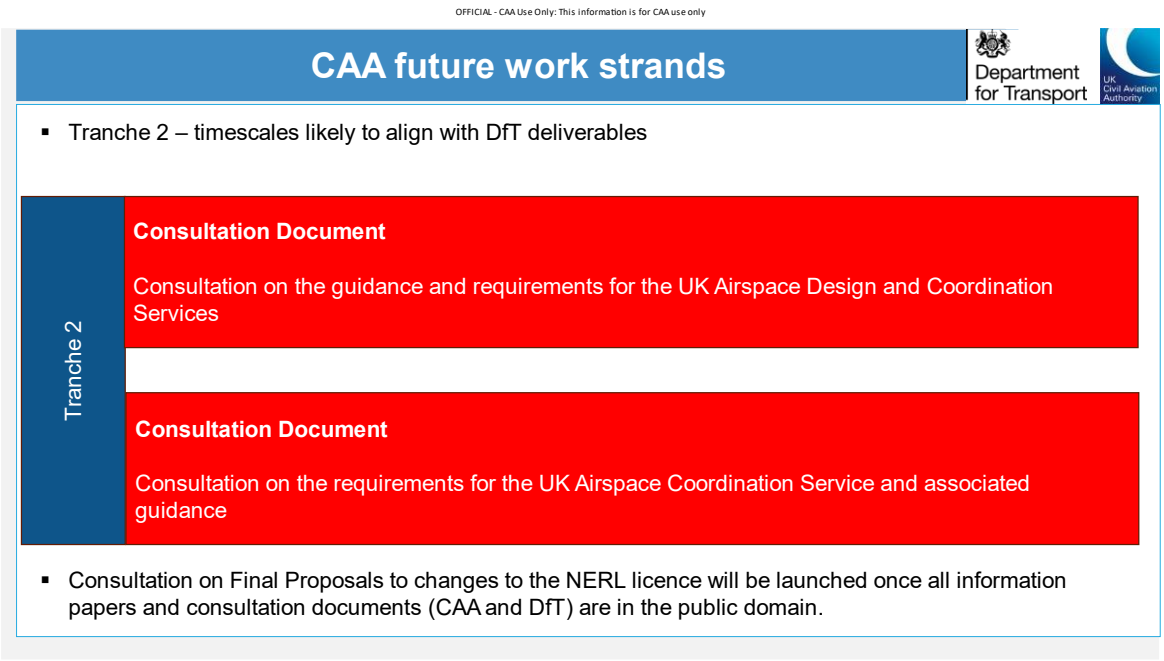

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DfT Deliverables

Department for Transport

UK Civil Aviation Authority

Tranche 2

Consultation Document

Consultation on the strategic objectives for the UK Airspace Design and Coordination Services

Consultation Document

Proposed changes to the Air Navigation Guidance & Air Navigation Directions

Information Paper

UK Airspace Design Support Fund: Fund Eligibility Criteria

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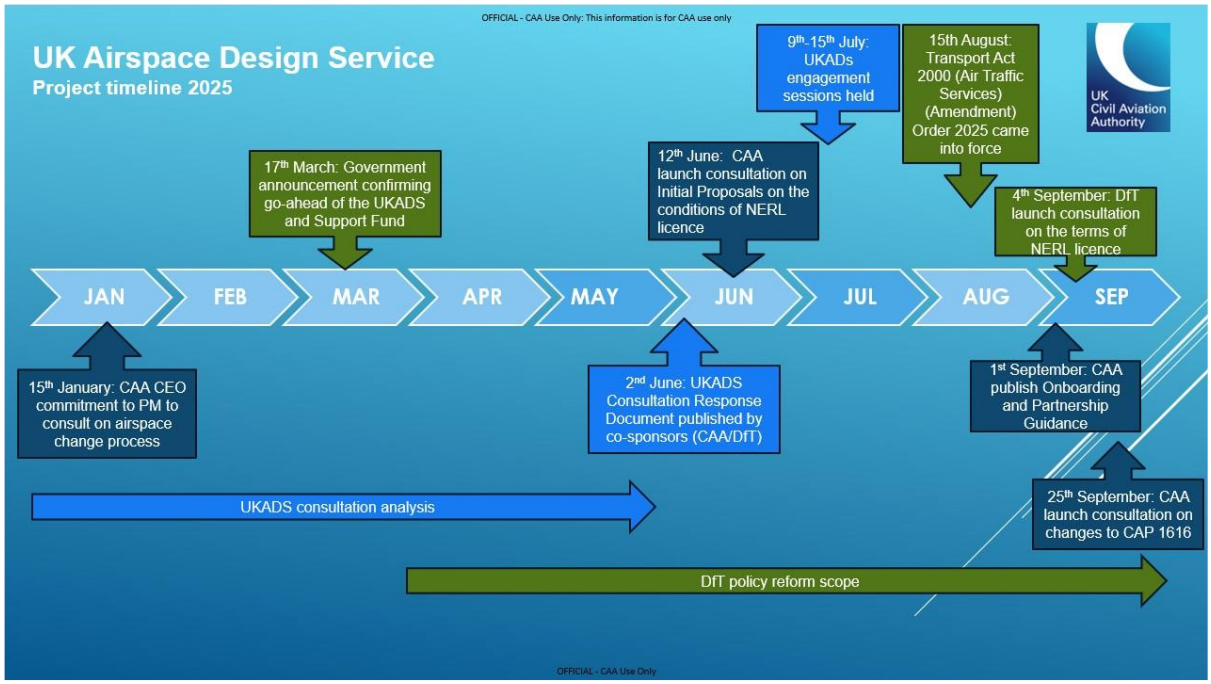

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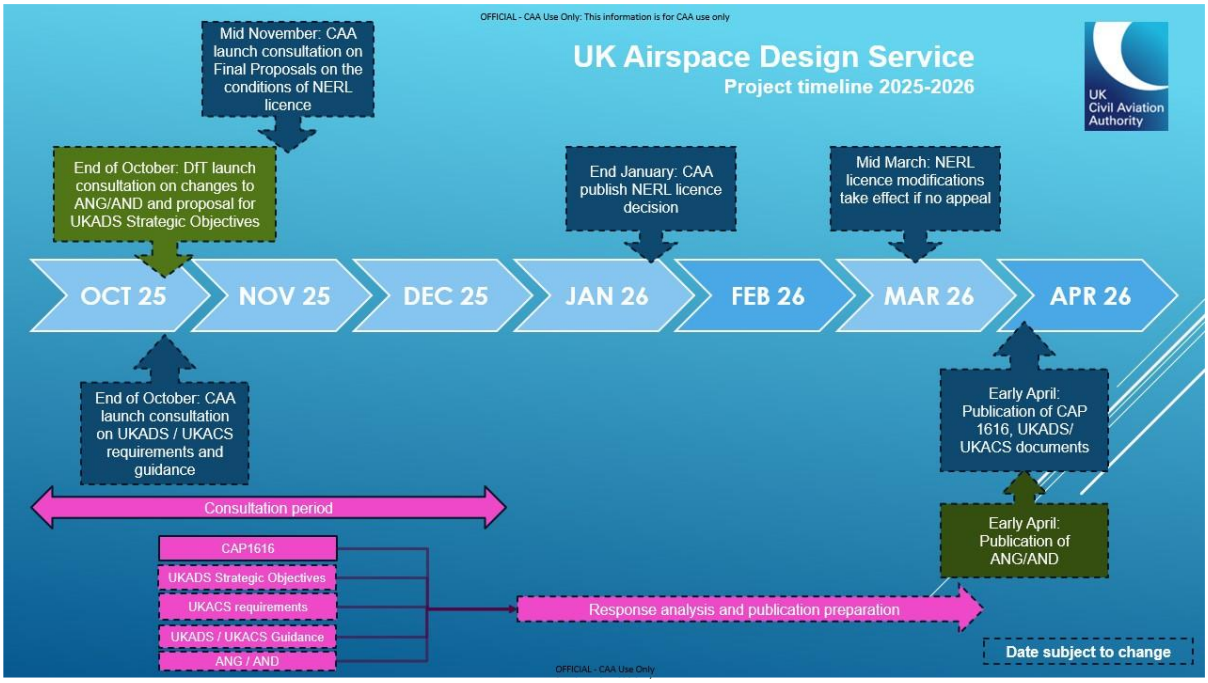

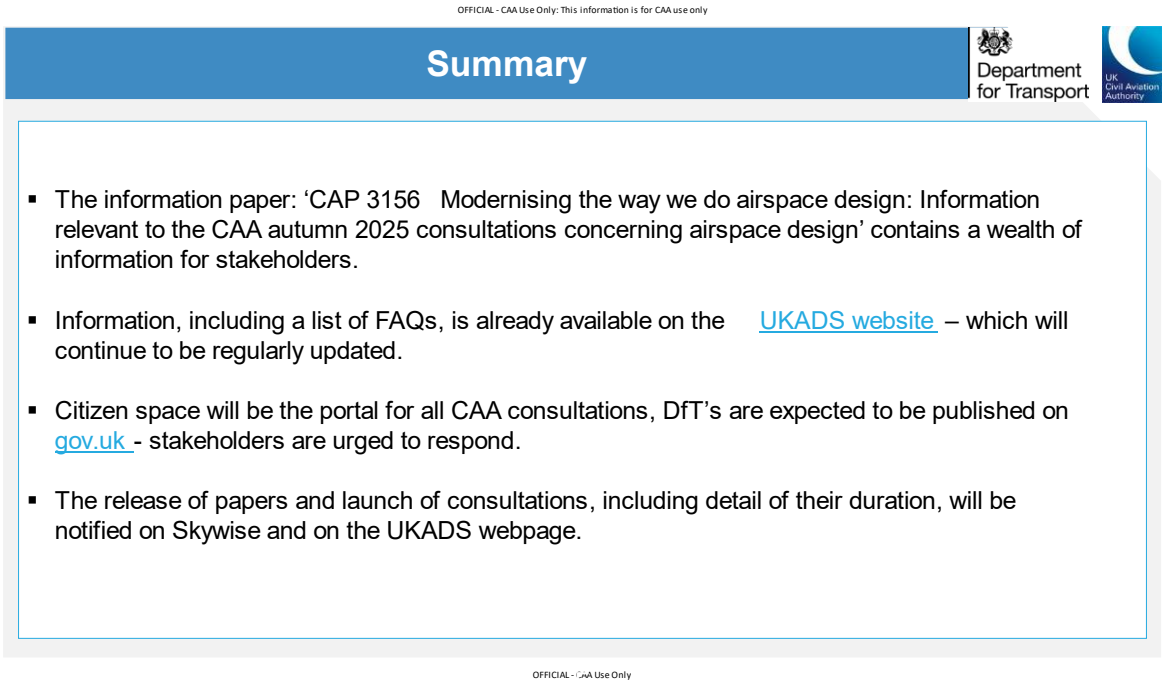

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Summary

Department for Transport

- The information paper: 'CAP 3156 Modernising the way we do airspace design: Information relevant to the CAA autumn 2025 consultations concerning airspace design' contains a wealth of information for stakeholders.
- Information, including a list of FAQs, is already available on the UKADS website – which will continue to be regularly updated.
- Citizen space will be the portal for all CAA consultations, DfT's are expected to be published on gov.uk - stakeholders are urged to respond.
- The release of papers and launch of consultations, including detail of their duration, will be notified on Skywise and on the UKADS webpage.

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AIWG and CAP3096 update

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CAP3096 FAQs

CAP3096 is:

- A pathway to compliance.
- In accordance with legislation, regulation and CAA policies.
- Proportionate and transparent.
- Seeking to ensure that airspace is used safely and efficiently.
- Likely to increase airspace awareness.
- Flexible noting ongoing priorities (we do need the process to start).
- Likely to require minimal work.
- Offering CAA guidance and support – Options Questionnaire.

In accordance with the AMS

CAP3096 is not:

- Seeking to remove LoAs.
- Stating current operations are unsafe.
- Looking to change the management of operations within airspace (unless they can be improved).
- Forcing change.
- Likely to be expensive when compared to the cost of litigation in the event non -compliance is challenged.
- Change for change's sake.

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CAP3096 and SUA – SARG Policy 133

Option: Derogation, continued non -compliance

Option: Change the airspace design, which would likely need a higher -level ACP and further work.

Option: SUA, TRA or TSA

The ruleset to be applied within the structure must be considered safe.

The ruleset can then accommodate the requirements of the operation.

A Temporary [illegible]
[illegible]
[illegible] ance with the
air traffic management arrangements notified for that volume of airspace.
A TSA is used when segregation is needed to protect participating and non -participating
[illegible] is used when aviation activity is considered safe enough to be accommodated in
the same airspace as some non-participating aircraft. However, additional ATM
[illegible] in a
[illegible] notified for that
volume of airspace and must therefore be segregated from other aircraft operating
[illegible] and outside of CAS and can be used in High Seas airspace.
TRAs should only be active when there is activity taking place within its boundaries;
[illegible] undaries;
[illegible] e users should not be permitted to enter the TSA. TSA should
only be established inside CAS and above territorial waters.
Each T[illegible]
[illegible] to do so. The
[illegible] are listed in AIP ENR 5.2.
The types of flight that may be permitted access to the TRA while activity is taking place
[illegible]
[illegible] in accordance with para 5.5 and Annex
H.

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CAP3096 Case Study

Appendix C - Example airspace design solutions

Airspace where controlling authorities have overlapping or competing requirements

1. If two proposed or established airspace structures under the control of different authorities overlap, the preferred approach is to reach an agreement on a delineation that satisfies both parties. For example, if the air traffic control (ATC) unit determines that there is no requirement to deliver ATC service in a portion of airspace, the controlled airspace structure could be redesigned to exclude that area. Once a mutually acceptable boundary has been agreed, two distinct structures can then be established.

Uncontrolled airspace structure that overlaps with a control zone (CTR) or control area (CTA)

2. Where agreement on distinct structures cannot be reached, it may be necessary to establish an arrangement for the shared use of airspace. As outlined in the main body, historical arrangements have introduced inconsistencies in airspace design, service provision[10] and formal notification. This guidance provides a framework for formalising such interactions through airspace structures that reflect current policy and safety expectations and ensure appropriate publication in the AIP.
3. **Use of temporary reserved area (TRA)/temporary segregated area (TSA) in overlapping airspace**. Where an airspace structure established around an aerodrome flight information service (AFIS) or air/ground communication service (AGCS) aerodrome overlaps with an existing CTR or CTA, the overlapping portion could be designated as either a TRA or TSA, based on the assessed risk and the resulting access restrictions required during activation.

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CAP3096 Case Study

4. If other aircraft may be allowed to transit during the period of activation, the uncontrolled, overlapping airspace structure could be a TRA.

5. If other aircraft will not be allowed to transit during the period of activation, the uncontrolled, overlapping airspace structure could be a TSA.

6. Any airspace structure established under this guidance should be managed in accordance with a Letter of Agreement (LoA) between the relevant parties. This LoA should include the nomination of an SUA authority [12] as well as conditions for activation and deactivation, the responsibilities of each unit and any necessary operational procedures to ensure safe use of the airspace.

7. Where the intended operational environment requires rules that differ from those associated with the airspace classification, the change sponsor could propose a bespoke ruleset for use during periods when the TRA/TSA is active. This ruleset should apply consistently across the entire uncontrolled structure, including the overlapping portion and not introduce additional rules specific to the TRA/TSA. The structure and ruleset must be developed as part of the ACP, assessed through the CAP 1616 process and shown to deliver an acceptable level of safety performance. The ruleset must be clearly defined, proportionate to the identified risks and documented in the supporting LoA. If the approved TRA/TSA is not active, the extant rules relevant to the published airspace classification remain applicable.

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The AIWG - ACP 2021-086

AIM

To resolve some presentational issues, for example data format, consistency, clarity, as well as the format of the AIP by disconnecting the publishing of airspace hours from the communications facilities in AD 2.17/2.18 entries and publishing the hours of applicability in AD 2.17, which will confirm that the required provision of service is being applied in the published ATS airspace structure (ATZ). Furthermore, this ACP will standardise the published level of all regulated aerodrome ATZs to 'above mean sea level' (AMSL) for vertical limits and 'above aerodrome level' (AAL) in accordance with CAA Policy, in remarks..

See AIC W 151/2025

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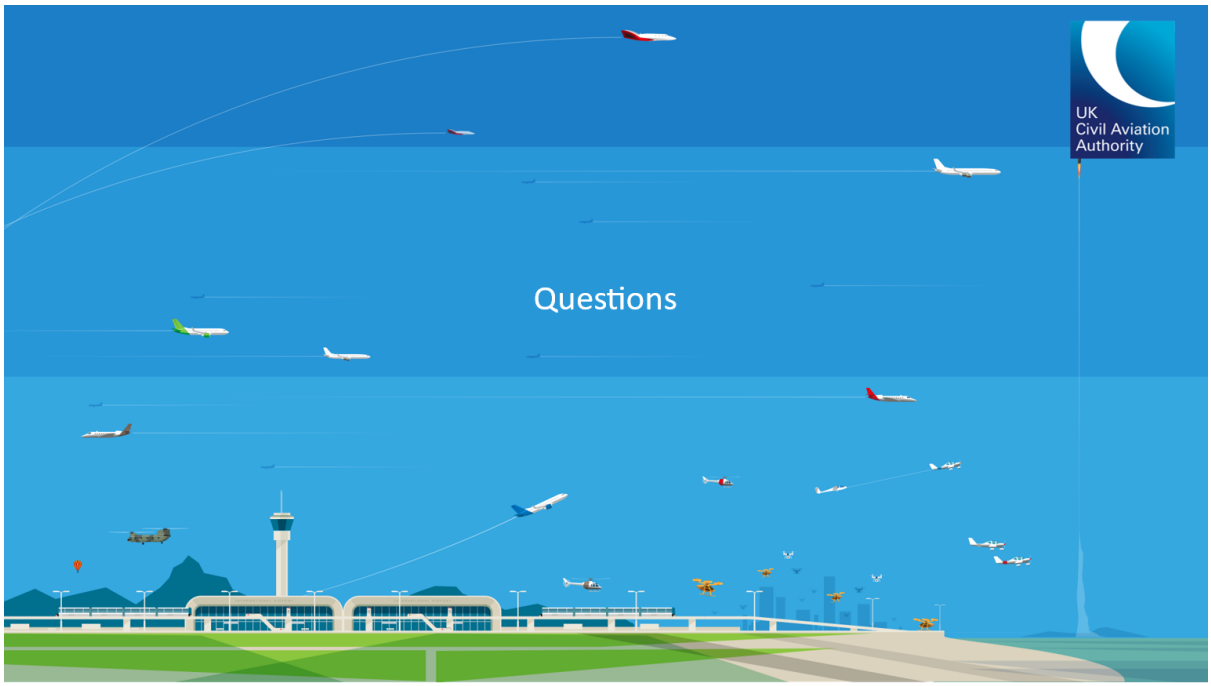

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Airspace Change Organising Group - Overview

- **ACOG's role in the UK Airspace Modernisation Strategy (AMS):**ACOG coordinates the UK Airspace Change Masterplan, ensuring interdependent ACPs are sequenced, integrated and aligned with the AMS Delivery Plan.
- **ACOG's mandate:**ACOG provides the AMS co-sponsors (DfT & CAA) with system-wide assurance, technical analysis and advice on risks, trade-offs and programme coherence.
- **ACOG's governance:**ACOG is a ring-fenced unit within NERL, overseen by an independent Steering Committee and accountable to the DfT and CAA through AMS reporting and Ministerial briefings.
- **ACOG's funding model:**ACOG's budget is delivered through the NERL en-route unit rate, subject to annual financial performance reviews and regulatory scrutiny.

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NATMAC #98, 01/10/25
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ACOG

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Airspace Change Organising Group – Core Functions

1. Lead development of the Masterplan (linking sponsor ACPs to the AMS).
2. Identify, manage and resolve design interdependencies across ACPs and clusters.
3. Apply the Cumulative Assessment Framework (CAF) to support transparent decision-making about key trade-offs (noise, CO_2, capacity, delay)
4. Provide shared tools, data standards and technical guidance (e.g. DVR, FOA templates).
5. Coordinate cross-sponsor consultation planning and stakeholder engagement.
6. Increasingly provide hands-on technical assistance to (FOAs, noise/CO_2 modelling, gateway documentation review) where sponsor capacity or funding is constrained.

Airspace Change Programme – Key achievements since NATMAC #97

- Provided intensive support to Edinburgh Airport to re-work its Stage 3 Submission and align with cluster-wide material, preserving ScTMA programme momentum.
- Coordinated cross-sponsor efforts in the Scotland and Northern England clusters to maintain alignment despite funding pressures and design conflicts.
- Rolled out the Flight Path Design Visual Repository (DVR) to integrate ACP route options, enabling sponsors, stakeholders and regulators to test interdependencies.
- Produced joint consultation content and strategies for multiple clusters, laying foundations for coordinated Stage 3 consultations.
- Continued national awareness campaigns (One Sky One Plan, Time Flies) to maintain political and public support for airspace modernisation.

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Airspace Change Programme – Look ahead

- Support coordinated public consultations on the system-wide airspace changes proposed for the Scottish cluster.
- Lead political and stakeholder engagement with MPs, local authorities and regional groups to prepare ground for the Scottish cluster consultation.
- Provide direct support to ACP sponsors in the Northern England cluster for the development of Full Options Appraisals and associated consultation materials.
- Expand the functionality of the Flight Path Design Visual Repository with improved navigation and labelling, stakeholder-focused overlays and a simplified “public consultation mode” to make proposed routes and impacts accessible to communities.

Transition to the UK Airspace Design Service

- In June 2025 the UK government confirmed the establishment of the **UK Airspace Design Service (UKADS)** to take forward system-wide redesign in the Southeast cluster, the UK’s most complex terminal airspace.
- In the near term ACOG will retain national coordination functions for the Scotland, Northern England and the West clusters where work is progressing toward public consultation.
- ACOG will also provide transition support to DfT, CAA and new UKADS leadership, ensuring programme alignment and minimising disruption to ACP sponsor timelines.
- Longer-term ACOG’s functions are likely to evolve and integrate into UKADS, subject to scope, capacity and delivery demand across the national programme.

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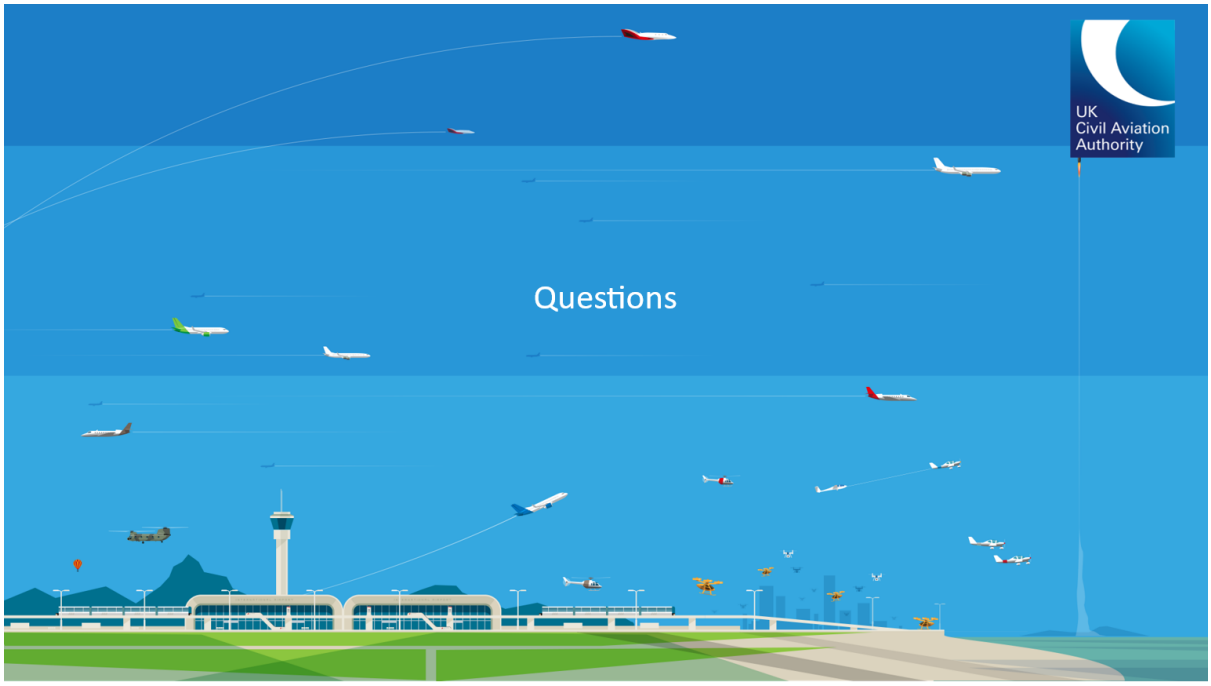

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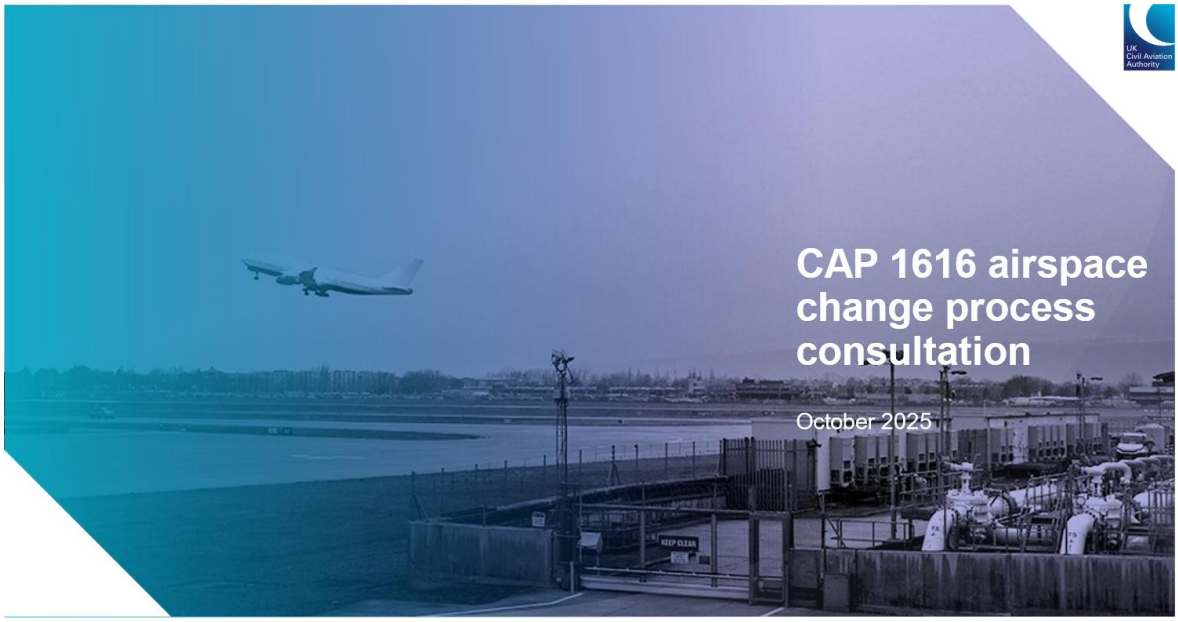

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CAP 1616 consultation

Our formal consultation setting out proposals to modify the airspace change process will run for **12 weeks**:

Thursday 25 September – Thursday 18 December 2025

We are modernising the way we do airspace design in the UK to ensure we can deliver the changes necessary to modernise airspace efficiently and effectively, with the establishment of the UK Airspace Design Service (UKADS).

To support this, we need to review our airspace change process to ensure it enables the UKADS provider to deliver airspace changes. This also presents an opportunity to review the broader CAP 1616 airspace change process with a view to further streamline it. As part of the CAA's response to Government to further improve UK economic growth and investment, we committed to consulting on improvements to the effectiveness and proportionality of our process for changing airspace in 2025.

DfT is expecting to consult on the Air Navigation Directions (AND) and Air Navigation Guidance (ANG). Any resulting changes in government policy on airspace will need to be taken into account in any updated airspace change process documentation.

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What we are consulting on

In scope:

- Proposals on modifications to CAP 1616: Airspace Change Process, edition 5.1.
- Airspace change proposal guidance for complex airspace change proposals sponsored by UKADS.

Not in scope:

- The decision to modernise the way we do airspace design by introducing the UKADS and any future developments of the UKADS.
- Government policy that impacts the airspace change process.
- Airspace change funding arrangements.
- The airspace change masterplan and related processes.
- Any airspace change proposals, past or present.

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Background

2017
CAP 1616 v1
Following consultation, CAP 1616 replaces CAP 725

2018
CAP 1616 v2
CAP 1616 version 2, minor amends

2020
CAP 1616 v3
CAP 1616 version 3, minor amends

2021
CAP 1616 v4
CAP 1616 version 4, minor amends

2022
CAP 1616 consultation
Public consultation on CAP 1616 v4

2023
CAP 1616 v5 and guidance
CAP 1616 v5 and accompanying guidance published, focussed on simplification, clarification and proportionality

2024
UKADS consultation
Public consultation on the creation of the UK Airspace Design Service (UKADS)

June 2025
UKADS announced
NERL confirmed as the UKADS provider

Sept 2025
Onboarding for LTMA region published
Onboarding for the LTMA region ACPs published

Sept 2025
CAP 1616 consultation launched
Public consultation on CAP 1616 process launched

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Proposal 1: Reduce, remove or amend gateways

Applicable to: All ACPs | **Stage: Gateways**

Current process	Issue	Proposal– preferred option	Rationale	Impacts
Three gateways: • Stage 1 • Stage 2 • End of Stage 3. Four outcomes: • Passed • Decision pending • Not passed - targeted review • Not passed - full review. Sponsors can't progress in the process until the relevant gateway is passed.	We are seeking views on the value of gateways.	We explored 4 options our preferred option is: • **New milestone check at Stages 1/2** • **Maintain gateway at Stage 3 - Consult.** **Milestone check** : would be for CAA feedback only, sponsors would not have to pass to progress in the process. **Gateway**: Sponsors would have to pass the Consult gateway before they could progress.	Retaining the Consult gateway would provide regulatory oversight prior to the sponsor launching their consultation. This would help to provide assurance to sponsors and stakeholders that the sponsor has met the process requirements up to that point.	Under this preferred option, sponsors could progress their airspace change proposal (ACP) following the milestone check, without incorporating the process feedback from the CAA at the end of Stage 1/2. This could prevent the sponsor from progressing at Stage 3, if the CAA found that the process requirements for earlier stages had not been met.

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Proposal 2: Define the role of proposer, change sponsor and partner

Applicable to: All ACPs | **Stage: 1**

Current process	Issue	Proposal– preferred option	Rationale	Impacts
Anyone can submit and sponsor an ACP. The individual or organisation who submits the request for an ACP automatically becomes the sponsor of that ACP.	The introduction of the UKADS requires us to define the concepts of an airspace change proposer, sponsor, and partner.	**Proposer** - anyone who submits an ACP. **Sponsor** - the individual or organisation responsible for progressing the ACP. The proposer and sponsor could be the same or they could be different. E.g. if the UKADS provider became the sponsor. **Partner** - an organisation, usually an airport or ANSP, that will collaborate with the UKADS provider, where the UKADS provider will be the sponsor of the ACP.	The sponsor would be confirmed at the assessment meeting, which takes place in Stage 1.	When an ACP is submitted, the CAA will need to consider whether it impacts any mandate given (to the UKADS) to produce a single ACP incorporating multiple partners in any defined area of UK airspace. If it does, a decision will be made whether the objectives of the statement of need are incorporated into the objectives of the single ACP or whether the objectives cannot be progressed further because of the impact on the single ACP.

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

Applicable to: All ACPs | **Stage: 1**

Current process	Issue	Proposal– preferred option	Rationale	Impacts
The sponsor develops design principles that act as a framework to develop and evaluate their design options. There are mandatory, discretionary and bespoke design principles, specific to the local context and circumstances of individual ACPs. Sponsors must also engage relevant stakeholders to inform the development of the design principles, and the development and assessment of design options.	Creating a new set of standard design principles would ensure a more standardised approach across all ACPs.	To develop one set of standard design principles that apply to all ACPs. These design principles would continue to address safety, operational and environmental issues. They would align with the Air Navigation Guidance and government policy, which the CAA has a duty to consider when deciding on an ACP.	This proposal would enable all sponsors to have a more consistent approach to design and would mean design option(s) would be explored in accordance with these standardised design principles.	Aligned to government guidance, sponsors would still consider local issues and circumstances against the new set of standard design principles. Representative stakeholder engagement would inform this. Sponsors are more likely to develop proposals that, if implemented, assist the Government policy to improve UK economic growth and investment including by delivering the objectives of the airspace modernisation strategy.

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

Applicable to: All ACPs | **Stage: 1**

Current process	Issue	Proposal– preferred option	Rationale	Impacts
The sponsor develops design principles that act as a framework to develop and evaluate their design options. There are mandatory, discretionary and bespoke design principles, specific to the local context and circumstances of individual ACPs. Sponsors must also engage relevant stakeholders to inform the development of the design principles, and the development and assessment of design options.	Creating a new set of standard design principles would ensure a more standardised approach across all ACPs.	To develop one set of standard design principles that apply to all ACPs. These design principles would continue to address safety, operational and environmental issues. They would align with the Air Navigation Guidance and government policy, which the CAA has a duty to consider when deciding on an ACP.	This proposal would enable all sponsors to have a more consistent approach to design and would mean design option(s) would be explored in accordance with these standardised design principles.	Aligned to government guidance, sponsors would still consider local issues and circumstances against the new set of standard design principles. Representative stakeholder engagement would inform this. Sponsors are more likely to develop proposals that, if implemented, assist the Government policy to improve UK economic growth and investment including by delivering the objectives of the airspace modernisation strategy.

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Proposal 5: Combine Stage 1 and Stage 2 of CAP 1616 into a single stage

Applicable to: All ACPs | **Stage: 1 and 2**

Current process	Issue	Proposal– preferred option	Rationale	Impacts
Stage 1 – Define: the sponsor produces a statement of need defining their ACP requirements. They define the current-day scenario and develop design principles, which are shared with relevant stakeholders. **Stage 2: Develop and Assess:** the sponsor develops design options and baseline scenarios to compare the impacts of proposed changes, engaging key stakeholders in the design options. Followed by an initial options appraisal.	In this consultation we propose changes to refine requirements at Stage 1 and Stage 2. When this consultation closes, following analysis and consideration of the feedback we will make a decision whether to progress these proposals affecting Stage 1 and Stage 2.	Combine Stage 1 and Stage 2 into one stage.	If our other proposals relating to Stage 1 and Stage 2 were carried forward into the revised process, this would reduce the requirements for sponsors in Stage 1 and Stage 2, resulting in a shorter process. Combining Stage 1 and Stage 2 into a single stage would be a logical step.	Combining the current Stage 1 and Stage 2 would simplify the early steps of the airspace change process while maintaining key activities such as targeted stakeholder engagement and design development.

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Proposal 6: Remove the requirement for the CAA's assessment of the change sponsor's initial and full options appraisals

Applicable to: All ACPs | **Stage: 3**

Current process	Issue	Proposal– preferred option	Rationale	Impacts
Following the Stage 2 and Stage 3 gateways, the CAA produces and publishes our assessment of the sponsor's initial and full options appraisals, respectively, on the airspace change portal once a sponsor has passed the current Stage 2 and Stage 3 gateways.	This process creates duplication between the CAA's review that the sponsor's initial and full options appraisals have met the requirements of the airspace change process at the Stage 2 and Stage 3 gateways, and the CAA's options appraisal assessments. These are currently two parallel but separate activities.	Remove the requirement for the CAA to produce an assessment of the change sponsor's initial and full options appraisals and publish them on the airspace change portal once a change sponsor has passed the Stage 2 and Stage 3 gateways respectively.	This would streamline our internal processes, removing duplication between CAA's assessments undertaken for the gateway and the initial and full options appraisals. This would align with the approach taken for other subject matter expert assessments by the CAA, e.g. the consultation and safety assessments. These are not published with each gateway outcome but are published after the CAA's decision at Stage 5.	We would continue to assess the process and methodologies followed by the sponsor to prepare the initial and full options appraisals against the process requirements as part of the Stage 2 and Stage 3 gateway assessments. We would continue to produce and publish the CAA's assessment of the sponsor's final options appraisal as part of the regulatory decision-making outputs at Stage 5.

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Proposal 7: Reduce the number of metrics in the options appraisal

Applicable to: All ACPs | **Stage: 3**

Current process	Issue	Proposal– preferred option	Rationale	Impacts
As part of their options appraisal, sponsors use a set of metrics to assess and compare the potential costs/benefits of different design option(s) considered in their ACP. The sponsor is also required to value all relevant costs and benefits of the design option(s) through their net present value (NPV) and benefit cost ratio (BCR) which are used measures to summarise the cost benefit analysis (CBA).	Experience has shown that the costs and benefits associated with certain metrics is similar across the design option(s) developed by a change sponsor. Therefore, such metrics do not provide a strong basis for selecting a preferred or best-performing option.	We would continue to set environmental metrics based on the environmental objectives' guidance given to the CAA in the ANG. We would **retain** the factors aligned with Section 70 of the Transport Act 2000 and the airspace modernisation strategy: - Safety. - Airspace efficiency, including simplicity. - Access, including integration.	The removal of these certain metrics would help to streamline the process and reduce the amount of time required by sponsors as well as the CAA to undertake the assessment of these metrics and would reduce regulatory burden. It would also help to reduce the amount of information presented to stakeholders in the consultation, allowing stakeholders to focus on the metrics that provide the most relevant considerations and insights.	Reducing the number of metrics could make it more difficult for stakeholders to understand the costs and benefits associated with the airspace change. Although, sponsors could still choose to undertake assessment of any additional metrics that they consider would assist them in their work. However, they would not be submitted to the CAA as a relevant consideration for our airspace decision.

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Proposal 8: The UKADS provider would perform full and final options appraisals of the system end state against the baseline scenarios

Applicable to: UKADS ACPs | **Stage: 3**

Current process	Issue	Proposal– preferred option	Rationale	Impacts
The sponsor must conduct the options appraisals of each design option against the baseline scenarios to understand its impacts. The full and final options appraisals require quantified and monetised assessment of the design option(s), where all reasonable costs and benefits have been quantified over the appraisal period of the airspace change.	In a phased deployment of an ACP, assuming the impacts from all deployments would occur from year 1, or assuming the impacts would increment linearly over the appraisal period from year 1 (corresponding with the first deployment) to year 10 (corresponding with the last deployment) would not provide an accurate representation.	For complex ACPs which would need to be implemented in a series of deployments spanning a number of years, the UKADS provider would not be required to model a multi-stage options appraisal process for the full and final options appraisals. The UKADS provider would only perform an assessment of the system end state design option(s) against the baseline scenarios in the full and final options appraisals.	We consider this to be a pragmatic approach to a complex problem and takes into account the fact that stakeholders would be fully informed of the impacts of the end state design as well as the disadvantage that stakeholders would not be informed on the impacts of each deployment. This option is preferred due to its simplicity and feasibility for a complex ACP.	A drawback of this option is that the sponsor's consultation would not provide clear and transparent information for stakeholders of the impacts over the initial years of the deployments.

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Proposal 9: The UKADS provider would assess the combined impacts of the system-wide design, including any cumulative impacts, in the final options appraisal at Stage 4

Applicable to: UKADS ACPs | **Stage: 3**

Current process	Issue	Proposal– preferred option	Rationale	Impacts
If an ACP is linked to another ACP, this link must be clearly identified through the engagement and consultation processes, and in the final ACP submitted to the CAA. The environmental impacts of the linked proposals must be assessed on a combined basis.	It is necessary to consider how the impacts in a single ACP covering multiple airports would be assessed. An airspace change process requiring an assessment of combined impacts for an ACP sponsored by the UKADS provider would result in an unmanageably high number of combinations.	For complex single ACPs the UKADS provider would not be required to assess the combined impacts of the system-wide design in the full options appraisal at Stage 3. These impacts would be assessed as part of the final options appraisal at Stage 4 when a final system-wide design has been selected. These would be presented as part of the ACP that is submitted to the CAA for decision-making at Stage 5.	This approach is proportionate as otherwise the unmanageably high number of combinations would be unfeasible in terms of workload, project timelines, funding budgets, and modelling/assessment resourcing. This option would create more proportionate regulatory oversight demands and lower costs to industry.	Once a final system-wide design option has been selected and developed post consultation, a single noise exposure map (contours) for the full system-wide design would be produced. The noise impact would be quantified using TAG based on the population exposure according to the single noise exposure map. This would eliminate the risk of double-counting where there are cumulative impacts.

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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 ACPs | **Stage: 3**

Current process	Issue	Proposal– preferred option	Rationale	Impacts
The consultation length must be proportionate to the scale and impacts of the ACP and take into account relevant government guidance or best practice. The accepted standard stated in the CAA's guidance is that permanent ACP consultations should last for 12 weeks. The CAA may consider a reduced consultation period where a sponsor provides a strong rationale.	The Government's Consultation Principles (2018) state that consultation should last for a proportionate amount of time and that the length should be based on the nature and impact of the proposal. Unlike CAP 1616, it does not specify an accepted standard and there is no reference to a specified number of weeks, meaning that the CAA's process is not aligned to government guidance.	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.	The removal of the reference to 12 weeks, would allow sponsors to propose the appropriate length of consultation, proportionate to their stakeholders' needs and the impacts of their proposal. This would provide more opportunities to apply a scaled approach to consultation length according to the type, nature, and complexity of each airspace change proposal.	Although sponsors can currently propose a rationale for their consultation periods, this proposal may lead some stakeholders to consider that sponsors will not consult for a sufficient period. This concern would be mitigated as the CAA would still assess the sponsor's rationale for their length of consultation at the Stage 3 gateway, ensuring the length proposed was proportionate to the proposed level or complexity of the ACP.

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Proposal 11: Refine and introduce new criteria for convening public evidence sessions

Applicable to: All ACPs | **Stage: 5**

Current process	Issue	Proposal– preferred option	Rationale	Impacts
For Level 1 ACPs, the CAA may organise a public evidence session where there is sufficient interest to justify holding one and it is proportionate to do so. The public evidence session gives stakeholders, other than the sponsor, an opportunity to directly provide the CAA decision-maker with their views on the airspace change proposal, in a public forum.	The requirements for when a Level 1 ACP public evidence session should be held are not well defined within CAP 1616. This can lead to uncertainty as to when a public evidence session may be convened.	We propose the following criteria for convening a public evidence session: - Level 1 ACP 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. Or - Level 1 ACP where the UKADS provider is the change sponsor and there are five or more partners.	By having clear criteria for when a public evidence session would be held, sponsors and stakeholders would have a clear indication at the start of an ACP when a public evidence session may be convened.	This would enable sponsors to plan their ACP timelines and resources to take account of public evidence session requirements when needed.

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Proposal 12: Remove the possibility of publication of draft CAA decisions

Applicable to: All ACPs | **Stage: 5**

Current process	Issue	Proposal– preferred option	Rationale	Impacts
For some Level 1 ACPs, the CAA may publish a draft decision before making a final decision on whether to approve the airspace change. The CAA will publish a draft decision for Level 1 ACPs when it is considered proportionate to do so. For example, we may publish a draft decision for proposals which are highly complex, impactful, or have a high level of public interest.	Publishing a draft decision adds time to the length of the airspace change process. In certain circumstances the delay may be disproportionate to the benefit of publishing a draft decision. Consequently, we may decide not to publish a draft decision and, in such circumstances, when we publish the final decision we explain our reason for electing not to publish a draft decision.	We propose to remove the requirement for draft CAA decisions.	The CAA has not utilised this option since its introduction. It was intended to ensure that we had understood all the information that had been provided to us, so we did not make factual mistakes in our decisions. Experience to date shows that this has not been an issue and in our view the possibility of this step in the process does not add sufficient benefit to the process to justify retaining it.	Removing the draft CAA decision for Level 1 ACPs would help to streamline the process and reduce regulatory burden by removing a step that adds to the proposal's timeline.

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Proposal 13: Consolidate Stage 5- Decide and Stage 6 - Implement

Applicable to: All ACPs | **Stage: 6**

Current process	Issue	Proposal– preferred option	Rationale	Impacts
At Stage 5, we review and assess the sponsor's final proposal and decide whether to approve the ACP. If approved, the change sponsor moves to Stage 6 – Implement. The sponsor must fulfil any conditions or modifications set out in the regulatory decision, finalise and submit aeronautical data to the CAA for validation and update all relevant documentation where needed.	The regulatory decision typically includes specific conditions that must be fulfilled by the sponsor during Stage 6, prior to implementation. These may include, for example, the completion of air traffic controller training or changes to aeronautical charting. Until the conditions required prior to implementation are met, the sponsor cannot implement the change into the live air traffic system.	We do not propose to make any changes to the process required for Stage 6, but we do propose that the current Stage 6 forms part of the current Stage 5 process.	Given the dependencies between the decision and implementation requirements, it is efficient for the requirements of Stage 6 to be incorporated into the final decision made at Stage 5.	Incorporating Stage 6 requirements into the Stage 5 decision would enhance clarity and accountability and assist a seamless transition from CAA decision to sponsor implementation, reducing the risk of delays or non-compliance.

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Proposal 14: Outline the information the UKADS provider would be required to provide to stakeholders prior to any individual deployment

Applicable to: UKADS ACPs **Stage: 6**

Current process	Issue	Proposal– preferred option	Rationale	Impacts
Due to the scale of change and size of some complex ACPs, it may not be possible for the UKADS provider to safely implement all aspects of an approved ACP in a single, simultaneous deployment. With the need to maintain the delivery of a real-time ongoing air traffic service, the ACP could need to be implemented in a series of deployments.	These deployments may need to be phased over a period of years. This could lead to steps being required to safely sequence the deployments for the single ACP.	The airspace change guidance for the UKADS provider would outline the information the UKADS provider would be required to provide to stakeholders prior to any individual deployment. We are seeking feedback on what information stakeholders would like to know, or consider a change sponsor should ensure is provided, before implementation of each deployment in a multi - deployment approved ACP.	This information could be compared to a utility provider providing information on forthcoming road closures, or information provided ahead of road construction notifying of associated speed restrictions or road closures.	The information provided ahead of an individual deployment should clarify the expected impact of the deployment - noting that the full impacts of the approved ACP will not be realised until all deployments have been implemented.

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Proposal 15: Remove the post implementation review (PIR) and replace it with an ongoing airspace performance oversight process

Applicable to: All ACPs **Stage: 7**

Current process	Issue	Proposal– preferred option	Rationale	Impacts
The PIR analyses the impacts of the implemented airspace change to allow the CAA to determine if the change has, or has not, resulted in the expected impacts and outcomes of the approved ACP. The PIR is not an opportunity to re-run the decision-making process. Nor is any request for stakeholder feedback a consultation.	The PIR data collection is usually over the 12 months after the change has been implemented. This snapshot in time does not provide an ongoing review of the airspace. PIRs are only mandatory for Level 1 ACPs which are often complex and, as such, it would not be possible to instantly revert the airspace to its previous design. If the CAA considered a reversal or modification was necessary, a new ACP would be required.	Remove the PIR and replace it with an ongoing airspace performance oversight process. This new oversight process would enable a performance review programme for UK airspace. It would take account of the drivers for delivering the airspace modernisation strategy including providing data on the safety and efficiency for UK airspace.	Replacing the PIR process with this new regulatory oversight process would help to shorten the airspace change process timeline and reduce resource requirements for the sponsor, while retaining the benefits of monitoring the impacts post implementation.	This would enable the ongoing performance of UK airspace to be monitored with an oversight programme which takes account of changes to the overall operating environment across a range of metrics rather than the current inflexible snapshot in time following an airspace change.

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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 PBN compliant procedures

Applicable to: Pre-scaled ACPs | **RNAV Substitution**

Current process	Issue	Proposal– preferred option	Rationale	Impacts
CAP 1781 RNAV Substitution has been applied to procedures where the existing conventional IFP has been disestablished following the decommissioning/removal of the NAVAID on which it is predicated.	CAP 1781 was designed to be a temporary fix and a longer-term solution to transition the temporary procedures designed in CAP 1781 and make them permanent is required to maintain safety and operational requirements in line with the airspace modernisation strategy.	Any procedure designed under CAP 1781 would undertake a Level 3 airspace change process to transition to a permanent solution.	This would allow for the ACP to undergo a transparent, proportionate airspace change process. It would enable the transition from RNAV Substitution to a permanent solution in a timely and cost-effective manner.	Level 3 ACPs have the potential for low impact on aviation and non-aviation stakeholders.

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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: Pre-scaled ACPs | **BVLOS**

Current process	Issue	Proposal– preferred option	Rationale	Impacts
There is an increasing demand placed on UK airspace to facilitate the flight of Unmanned Aircraft Systems (UAS).	We are seeking views on developing a new process within CAP 1616 that would enable the establishment of short-duration volumes of segregated airspace to enable Beyond Visual Line of Sight (BVLOS) UAS operations of low impact.	BVLOS UAS operations of low impact and short duration: - activated for up to 24 hours within a 7-day period - allow flights between 8am and 8pm only - only apply outside controlled airspace, at low level (below 500 feet) - only apply to drone operations in the Specific Category. After the 7-day period the CAA would not approve another application under this process in the same location for at least 28 days.	We propose that this proportionate approach to enabling BVLOS flights is needed to support the Government's priority of realising the economic growth benefits of new technologies and the joint DfT and CAA future of flight strategy.	We propose that the SORA generates the line(s) on the map and the buffer(s) required to enable the operations and airspace design to be safely segregated. The CAA would use this information to design and publish an airspace structure. We propose that this would be the only input to the design. Where identified and required, the CAA may undertake limited engagement with impacted aviation stakeholders.

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Overview

If all the proposed changes went ahead, we would move from the current process on the left to the updated process on the right.

Current process

Stage 1 DEFINE	Assess requirement
	Design principles
	DEFINE GATEWAY
Stage 2 DEVELOP and ASSESS	Options development
	Options appraisal
	DEVELOP and ASSESS GATEWAY
Stage 3 CONSULT / ENGAGE	Consultation / engagement preparation
	CONSULT/ENGAGE GATEWAY
	Commence consultation / engagement
	Collate & review responses
Stage 4 UPDATE and SUBMIT	Update design
	Submit proposal to CAA
Stage 5 DECIDE	CAA assessment
	CAA DECISION
Stage 6 IMPLEMENT	Implement
Stage 7 PIR	Post implementation review

Proposed process

Stage 1 DEFINE and DEVELOP	Assess requirement
	Design principles
	Options development
	Stage 1 Milestone check
Stage 2 CONSULT / ENGAGE	Options appraisal
	Consultation preparation
	CONSULT GATEWAY
	Commence consultation
	Collate and review responses
Stage 3 UPDATE and SUBMIT	Update design
	Submit proposal to CAA
Stage 4 DECIDE and IMPLEMENT	CAA assessment
	CAA DECISION
	Implement

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Questionnaire and next steps

The consultation will run for 12 weeks:

Thursday 25 September– Thursday 18 December 2025

You can submit responses online at:
https://consultations.caa.co.uk/safety -and-airspace-regulation-group/airspace-change-process-2025

Next steps:

- No decisions have been made yet.
- Once the consultation has closed, responses will be analysed.
- The feedback received will be considered and used to inform the development of any updated airspace change process.
- We will also need to consider any changes from the DfT's consultation on the Airspace Navigation Directions and Airspace Navigation Guidance.
- We expect the updated airspace change process will be published summer 2026.

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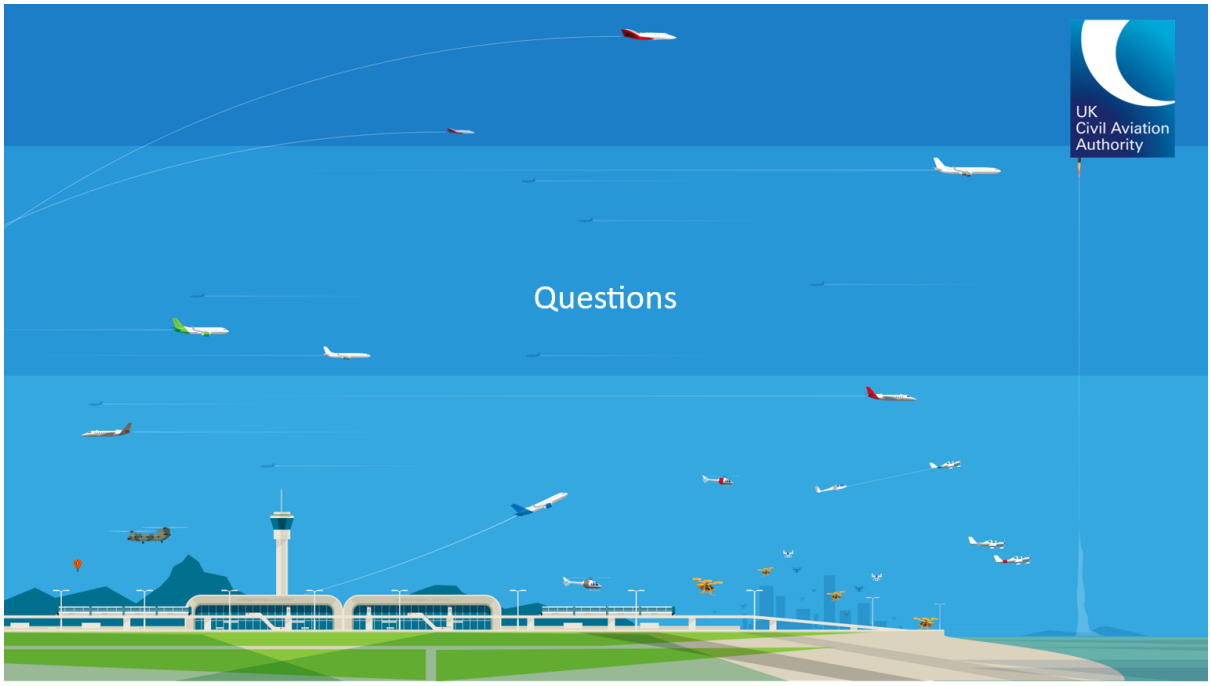

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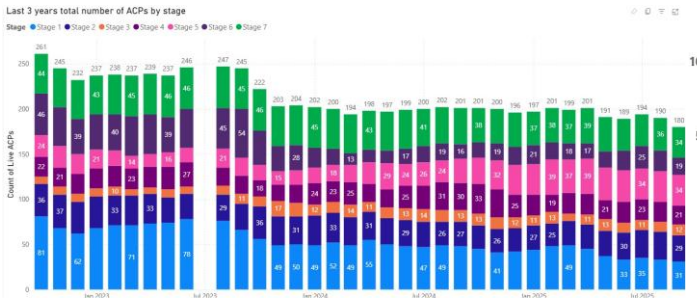
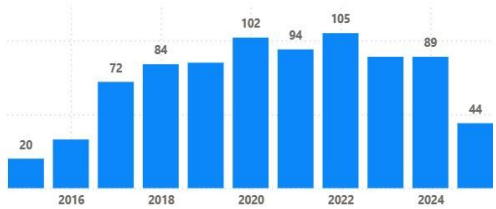
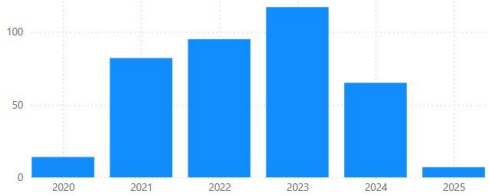
Trend Analysis – Airspace Change Proposals v Flow



Inflow



Outflow



- Inflow 2018 - CAP 1616 introduced and FASI initiated
- Overall reduction in ACPs despite large inflow in 2022
- Outflow usually completing 35 -50 Level per year, up to March 2025 these were included in the ACP stats. This accounts for 2025 change in outflow and inflow
- Approx 20 ACPs relate to CAP 725
- Approx 80 ACPs have an IFP dependency
- Dependent upon inflow we would expect to be below 180 ACPs by Q4 2025

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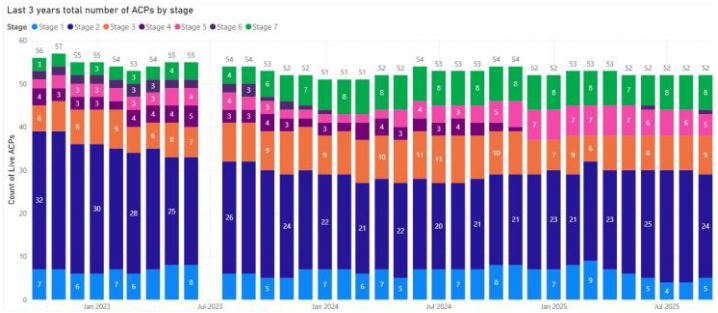
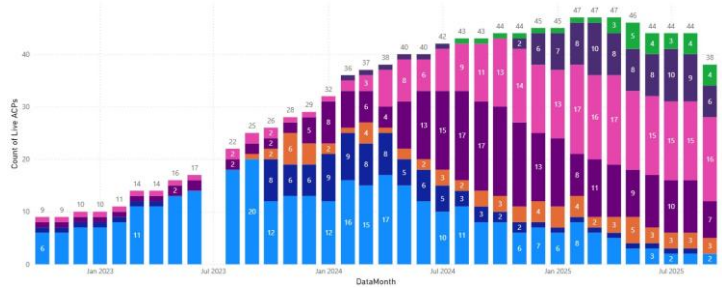
Airspace Change Proposals by Stage





Level 1 ACPs

- Reduced total **Level 1** changes since 2022.
- Low number of Level 1 ACPs in the early stages.
- Majority of Level 1 ACPs are in Stage 2

Level 3 ACPs

- **Level 3** introduced in Jan 2024 as part of CAP 1616 version 5
- Existing ACPs transitioned across
- We are seeing an increase in Level 3 changes, where the colour differential indicates the increased speed through the process.
- We expect further acceleration aligned to IFP resource.

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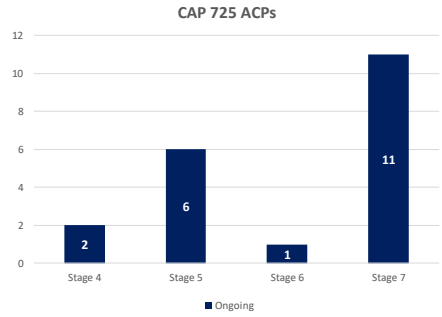
CAP 725 Airspace Change Proposals

CAP 725 total is **20** ongoing ACPs:

- Pre-decision (with Change Sponsor): **2** (Stapleford & Haverfordwest)
- Decision Stage (with CAA): **6** (Inverness, St Mary's, Belfast Int, Southend, Hawarden, Teesside)
- Implementation (post -decision): **1** (Neart na Gaoithe and Inch Cape TMZs)
- Post Implementation Review: **11**

Significant Post Implementation Review

- ACP-2013-07 Farnborough: PIR published April 2025
- Expect remainder of existing Stage 7s to be completed by Q4 2025



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Airspace Change Programmes
Future Airspace Strategy Implementation (FASI)

- **'LTMA' Cluster**
  - **14** ACPs currently within this Cluster
    - **14** 'In Progress'
    - **1** in Develop & Assess (Stage 2)
      - Bournemouth (Dec 2025)
    - **13** in Consult (Stage 3)
      - Biggin Hill (Gateway TBC)
      - Farnborough (Gateway TBC)
      - Gatwick (Gateway Jan 2026)
      - Heathrow R2 (Gateway TBC)
      - LAMP2 D2 (Gateway Jan 2026)
      - LAMP2 D3 (Gateway TBC)
      - LAMP2 D4 (Gateway TBC)
      - London City (Gateway TBC)
      - Luton (Gateway TBC)
      - Northolt (Gateway TBC)
      - Southampton (Gateway TBC)
      - Southend (Gateway TBC)
      - Stansted (Gateway TBC)
- **'WTA' Cluster**
  - **3** ACPs currently within this Cluster
    - **3** 'In Progress'
    - **2** in Consult (Stage 3)
      - Bristol (Gateway TBC)
      - LAMP2 D1.2 (Gateway TBC)
    - **1** in Stage 6 (Implement)
      - LAMP2 D1.1 (PIR TBC)

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Airspace Change Programmes
Future Airspace Strategy Implementation (FASI)

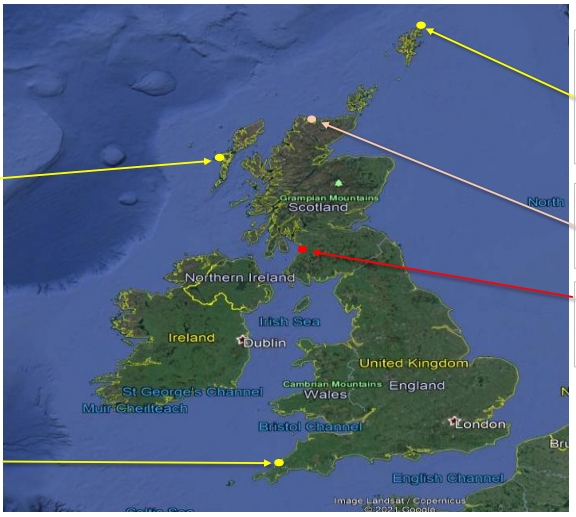
- **'ScTMA' Cluster**
  - **3** ACPs currently within this Cluster
    - **3** 'In Progress'
    - **3** in Consult (Stage 3)
  - Edinburgh (Stage 3 Gateway passed Sept 2025)
  - Glasgow (Stage 3 Gateway passed Sept 2025)
  - NERL ScTMA (Stage 3 Gateway passed Sept 2025)

- **'MTMA' Cluster**
  - **5** ACPs currently within this Cluster
    - **5** 'In Progress'
    - **1** in Develop & Assess (Stage 2)
    - **4** in Consult (Stage 3)
  - Leeds Bradford (Gateway April 2026)
  - Liverpool (Gateway TBC)
  - East Midlands (Gateway TBC)
  - NERL MTMA (Gateway TBC)
  - Manchester (Gateway TBC)

Space Launch Sites
Ongoing ACPs

Spaceport-1
Launch Operator TBC

Spaceport Cornwall
Launch Operator TBC



SaxaVord Spaceport
RFA
Orbex
Skyrora
HyImpulse

Space Hub Sutherland
Orbex
Development PAUSED

Prestwick Spaceport
Astraius
No longer in development

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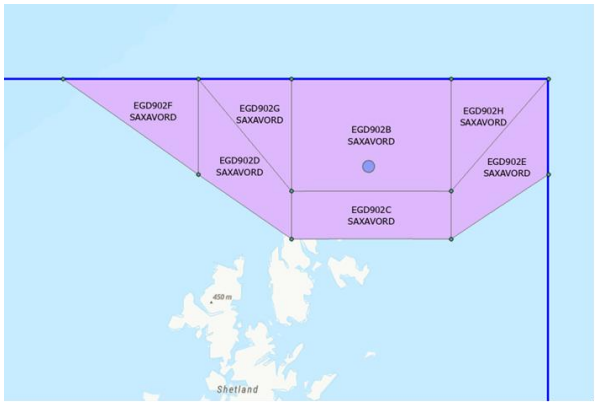
Airspace Change Proposals
Space Launches

SaxaVord Spaceport (Shetland Islands)

- Permanent (ACP-2017-79):
  - Currently in Stage 5 ('Decide')
  - CAA Decision currently Paused. Awaiting development of LoAs and international agreements
  - Subject to a wider northern hemisphere working group
- Temporary (ACP-2021-090):
  - Paused in Stage 5 ('Decide')
  - Pending outcome of permanent ACP decision

Final proposed airspace design
ACP-2017-79 SaxaVord Spaceport permanent



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Temporary Reserved Areas Sandbox Applications

- **ACP-2022-081 Establishment of a TRA for Trials of Manned and Unmanned Integration (Cranfield)**
  - Assessment Meeting held in July 2024. ACP is 'paused' whilst the sponsor progresses FID approval – could be unpausing this year.
- **ACP-2024-001 NATS BVLOS trial in Unsegregated Airspace**
  - Stage 5 Decide, CAA is awaiting a new timeline to accommodate the need for the sponsor to receive guidance and make updates t o the ACP submission.
- **ACP-2024-041 Integrated BVLOS Ops Trial at Kirkwall Airport**
  - Stage 4 Update & Submit (submission due Nov 2025)
- **ACP-2024-056 Darlington and Surrounding Areas TMZ for BVLOS Drone Delivery Services (Amazon)**
  - Stage 5 Decide (decision due Oct 2025)
- **ACP-2025-001 Addition of TRA to Burbo Bank TMZ**
  - Stage 4 Update & Submit (submission due Nov 2025)
- **ACP-2025-008 Project Lifeline**
  - Stage 4 Update & Submit (submission due Sept 2025)

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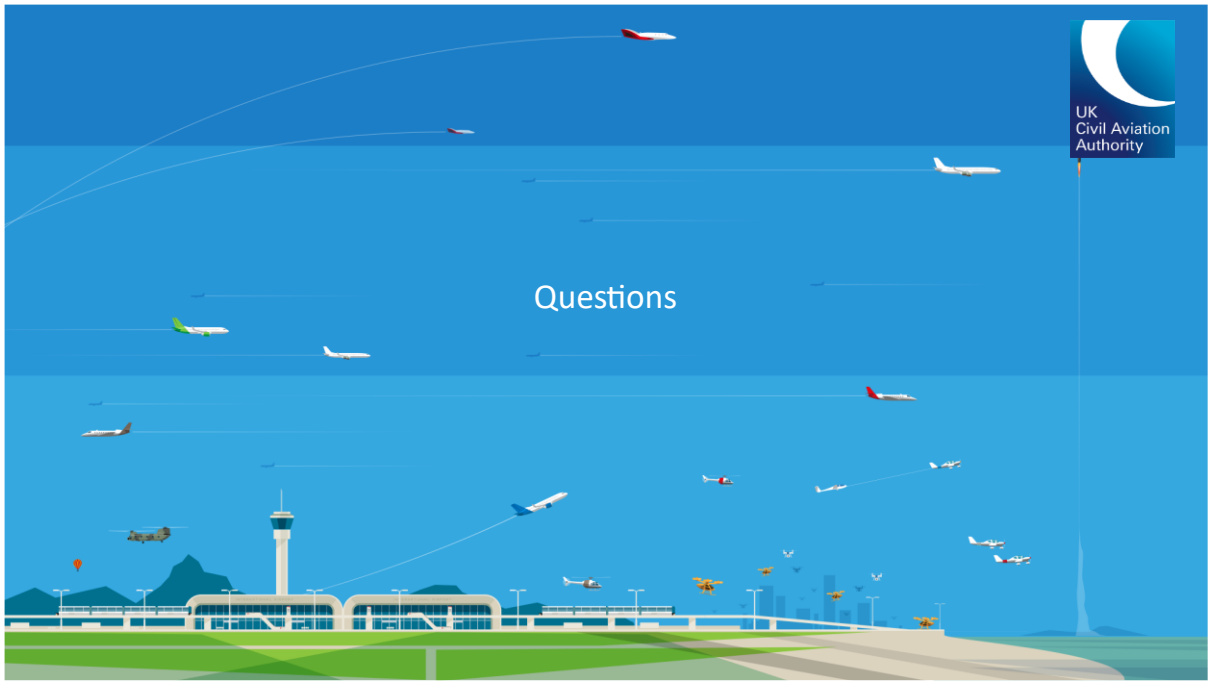

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Dates of future NATMAC meetings

- NATMAC 99 – 15th April 2026 on MS Teams
- NATMAC 100 – 7th October 2026 at Aviation House