

Outcome of the consultation on a UK Airspace Design Service: Q&A supplement

Overview

1. The consultation response document, CAP 3106 *Airspace modernisation: Outcome of the consultation on a UK Airspace Design Service*¹, summarised the responses to the joint DfT/CAA consultation and the outcomes.
2. Many consultation respondents raised specific suggestions or questions about how a UK Airspace Design Service (UKADS) would be set up and run. We have summarised many of these below (“**Issue**” – note that **these statements are from stakeholders, not DfT/CAA**) and commented on them where we can (“**DfT/CAA response**”). It is not practical to list every point raised, as some were very detailed or relate to aspects of setting up the UKADS that we can only address after further consultation. We have also omitted any points that are already answered by the consultation document (CAP 3029²) or the response document (CAP 3106).
3. We have arranged the specific suggestions or questions under these headings:
 - UKADS concept
 - Scope
 - Resources
 - UKADS remit
 - Impacts
 - Onboarding
 - Governance
 - Funding
 - Second-phase UKADS
 - Technical
 - Changes to the legal and policy framework
4. Abbreviations used in this document:
 - ACOG = Airspace Change Organising Group
 - ACP = airspace change proposal
 - AMS = Airspace Modernisation Strategy

¹ www.caa.co.uk/cap3106

² www.caa.co.uk/cap3029

- ANSP = air navigation service provider
- APDO = Approved Procedure Design Organisation
- BVLOS = beyond visual line of sight
- CAA = UK Civil Aviation Authority
- DfT = Department for Transport
- eVTOL = electric vertical take-off and landing
- ICAO = International Civil Aviation Organization
- IFP = instrument flight procedures
- IFR = instrument flight rules
- NERL = NATS (En Route) plc
- NSL = NATS (Services) Ltd
- PIR = post implementation review
- TMA = Terminal Control Area
- UKADS = UK Airspace Design Service

Specific suggestions and questions raised in responses to the consultation

UKADS concept

5. **Issue:** The UKADS would be best served by a bespoke solution. Phase one should only serve as a proof of concept to inform the second-phase, extended-scope UKADS. **DfT/CAA response:** As explained in Chapter 4 of the consultation document (CAP 3029), we agree that the option that appears to give the best outcome for achieving the long-term ambition for the UKADS to become responsible for all UK ACPs is to create a bespoke entity. But it could take some years to achieve the second-phase UKADS, not least because it would be likely to require primary legislation. These timescales would not meet the imperative that the UKADS should deliver modernisation of the London TMA region as soon as practicable.
6. **Issue:** The consultation document says the UKADS project has not sought to fundamentally change who manages the airspace or initiates airspace changes – that would for the most part remain with airports and ANSPs. How does this fit with the AMS objective of integrated airspace at national level? Would the UKADS be an ANSP and if so how would it share responsibilities with the ANSP designated for other air traffic management functions? **DfT/CAA response:** This remains true for the bulk of airspace change and the immediate imperative of the airspace change masterplan, in particular the complex airspace around London. But in the medium term we do envisage an established UKADS initiating state-wide changes in

pursuance of AMS integration objectives. The provider of the UKADS, NERL, is an ANSP. However, the UKADS would not manage the airspace. The safety case, implementation and management of the airspace would remain with the existing ANSP.

7. **Issue:** If airspace design is made a licensed function, would consultancies require licences, and if not licensed could NERL still sub-contract functions to them?
DfT/CAA response: There will be further consultations setting out proposals to modify NERL's licence to require it to carry out the UKADS function and to put the associated funding in place. There is no change for consultancies.
8. **Issue:** Being part of NERL, isn't the UKADS just the Airspace Change Organising Group (ACOG) in another form? **DfT/CAA response:** ACOG's current role is different to UKADS because it is limited to coordination and masterplanning. It has no power to design airspace. However, we agree that having two units within NERL responsible for different functions and different parts of UK airspace is likely to be inefficient. Hence the licence changes we are proposing in the consultation response document, CAP 3106 (page 6). See also policy paper [UKADS 25/4](#).
9. **Issue:** The requirements of and opportunities for General Aviation / overflowed communities / new and rapidly developing airspace users / smaller airports must be taken into account by the UKADS in designing airspace. Consultants have been known to ignore design changes suggested by other stakeholders and continue with a flawed design. **DfT/CAA response:** The UKADS will still be subject to the airspace change process where impacts on stakeholders must be taken into account. We have undertaken to consult on improvements to the effectiveness and proportionality of our process for changing airspace by September 2025, including changes needed to accommodate the UKADS. We recognise that the existing approach to airspace change does not easily support the level of coordination and cooperation needed to develop an effective, holistic, integrated, consistent, modernised design for UK airspace as envisaged by the AMS that can safely accommodate all users. This is a key part of the reasoning for developing the UKADS.
10. **Issue:** Airports should retain responsibility for airspace design up to 4000ft where noise management is the priority, because of their local stakeholder knowledge and interests linked to planning constraints, and should contract NERL to integrate designs above 4000ft. **DfT/CAA response:** The model where multiple airports design interdependent airspace would perpetuate the issues explained in the consultation document that risk delaying modernisation. These issues have given rise to the UKADS proposal.
11. **Issue:** The UKADS should assume a wider communication role to raise awareness among local communities and political audiences of the potential benefits of airspace modernisation (environmental, economic, social etc). **DfT/CAA response:** We agree. ACOG, NATS and airports have already done a lot of work along these lines, which

can be unified and built upon through a centralised airspace design function in collaboration with airports.

12. **Issue:** How will you ensure that airports continue to progress ACPs (at their own expense) while the UKADS is under development? **DfT/CAA response:** It is important that they do. We anticipate that London cluster ACPs that are currently in progress will only be onboarded by the UKADS at the beginning of Stage 3 of the CAA's CAP 1616 airspace change process – and the Airspace Design Support Fund is not expected to cover the costs of Stages 1 and 2. Airports therefore need to continue progressing ACPs while the UKADS is under development, so that they are in a position to be onboarded when NERL is ready to start providing the UKADS and to administer the Support Fund.
13. **Issue:** Will the UKADS be subject to the same standards and requirements of probity, transparency and accountability as other public bodies, such as a requirement to respond to Freedom of Information requests? **DfT/CAA response:** No, as NERL is not a public body, but the aim is for governance arrangements to ensure appropriate transparency.
14. **Issue:** NATS Services Ltd (NSL) provides air traffic services at a number of UK airports. It also provides a third-party airspace change consultancy to some of those airports. Will it become a 'partner' to the UKADS in the London TMA region? It is also an Approved Procedure Design Organisation (APDO). How will that capability be managed within the UKADS – brought in-house or under subcontract subject to competitive tender with other UK APDOs? **DfT/CAA response:** Currently it is normally the airport, rather than the airport's ANSP (for example NSL), that sponsors an ACP. Within the context of the London airports, once the UKADS is in place, the airport will be the partner but NATS Services Ltd may (as the airport's ANSP) be considered a stakeholder to the relevant ACP(s). It will be for NERL to make business decisions about the APDO capability, subject to the conditions of its air traffic services licence.

Scope – London TMA region

15. **Issue:** As a new function, the UKADS should start with a comprehensive pilot in less complex airspace, rather than the most complex and challenging airspace in the UK. Could you clarify the precise definition of 'London TMA region'? The consultation document shows 12 major airports, but suggests that smaller airfields in the region would also be in scope. **DfT/CAA response:** The UKADS priority in the short term is to progress the ACPs that deliver the greatest benefits from modernisation and that the current approach is unlikely to be able to deliver. The most significant of these ACPs relate to the complex London cluster of the airspace change masterplan. Stakeholders broadly recognise that NERL is likely to be the only entity with the ability to deliver this modernisation in the timeframe envisaged. NERL has the blend of skills, capabilities, expertise and access to the relevant structures and systems to deliver integrated airspace design. The consultation document explained that the

London cluster comprised the ACPs of 12 airports in south-east England and NERL.³ However, clearly there could be a potential interaction with the many smaller airports in the south-east (for example, Lydd or Brighton City). To ensure a holistic approach to the airspace design, we will therefore define the UKADS initial scope as anywhere in the London TMA, plus adjoining airspace serving neighbouring airports (for example, Bournemouth and Southampton) that is actually outside the London TMA but has interdependencies with the London TMA – see pages 5 and 30 of CAP 3106, the consultation response document. For the purposes of consultation we called this the “London TMA region” for convenience, but it will be formally defined in the UK Aeronautical Information Publication.

Scope – UKADS priorities

16. **Issue:** The definition of which ACPs are deemed a priority to realise the aims of the AMS could be a contentious subject. Who will determine that priority, and will there be an independent adjudicator? In the medium term, the UKADS initiating ICAO Flight Information Service (FIS) alignment may require the introduction of controlled airspace. Who will decide the airfields involved and who will pay? If the UKADS costs are borne by industry, then there should be a mechanism for smaller stakeholders to suggest improvements to airspace design, and a commitment from the CAA and the UKADS to give these serious consideration and to pursue them where appropriate.
DfT/CAA response: We envisage DfT/CAA setting the scope through strategic priorities/objectives for the UKADS. Other stakeholders will play an active and welcome part in this through the Advisory Board. As set out on pages 5 and 30 of CAP 3106, the consultation response document, the scope of the UKADS will be the London TMA region, with the airports forming the London cluster of the current LTMA airspace change masterplan a priority; the medium-term aims are some way ahead but establishing the UKADS lays the groundwork for pursuing these.
17. **Issue:** Will the *Procedure for the CAA to Review the Classification of Airspace* (CAP 1991) move within the scope of the UKADS? **DfT/CAA response:** In the short term, no. We have a functioning procedure within the CAA that covers the whole UK, whereas the UKADS scope for designing airspace is limited initially to the London TMA region. In the medium to long term, as the UKADS widens its scope geographically or if a second-phase, extended-scope UKADS ultimately becomes responsible for all UK airspace, we would need to decide whether this procedure would more naturally sit with the UKADS, along with other state-wide, rather than airport-specific, airspace modernisation. This would be some years in the future and we cannot give a definitive answer for now (see pages 11 and 88–90 of CAP 3106, the consultation response document).

³ See page 83 of CAP 3029, the consultation document. Manston airport has since been removed from the London cluster, reducing the total to 11 airports. <https://www.caa.co.uk/commercial-industry/airspace/airspace-modernisation/airspace-change-masterplan/>.

Scope – ACPs outside the UKADS

18. **Issue:** If organisations are allowed to sponsor ACPs after the formation of the UKADS where the UKADS is unable to prioritise them, could two systems working in parallel cause confusion and undermine or slow the overall aim of airspace modernisation? Should the UKADS play a consultative role? To avoid getting involved in local aerodrome requests, could the UKADS set clear technical or 'size of change' thresholds for defining whether it needs to be involved? **DfT/CAA response:** There will unavoidably be two systems working in parallel because the UKADS cannot take on all ACPs at once. Where the UKADS cannot prioritise an ACP that is in its scope because, for example, it is not urgent or is of local rather than strategic benefit, the proposer of an ACP can – at least until a future time when a potential second-phase UKADS undertakes all ACPs – sponsor the ACP itself through the CAP 1616 process. Any changes proposed would need to be consistent with the work of the UKADS (see pages 7 and 50–53 of CAP 3106, the consultation response document). However, this is likely to exclude all London cluster ACPs – they are part of the airspace change masterplan because they are interdependent and/or strategically important. Page 38 of the consultation document CAP 3029 discussed this possibility under a heading “ACPs outside the London TMA region”, but there may also be ACPs at smaller airports/aerodromes in the London TMA region to which this applies. We agree that it may be possible for the sponsor to negotiate the use of some services from the UKADS (consultation document paragraph 5.18) and that NERL may be able to set criteria for which ACPs are unlikely to require the involvement of the UKADS in the short term. This is all driven by the scope of the UKADS at a given point in time.
19. **Issue:** If modernisation (such as deployment of Instrument Approach Procedures) at smaller aerodromes is seen as being of insufficient priority, how will those aerodromes secure the airspace design resources needed? This is of most concern if the second-phase UKADS is the only authorised provider of services. **DfT/CAA response:** While the initial UKADS is building capability, such aerodromes can agree with the UKADS to progress an ACP independently (see above and pages 7 and 50–53 of CAP 3106, the consultation response document). Given that the Airspace Design Support Fund will be paid for mainly by airlines and other aircraft paying the new Airspace Design Charge, it is unlikely that smaller aerodromes not served by such operations would be eligible for the fund. The position may be different for the second-phase, extended-scope UKADS responsible for all UK airspace change, but those proposals have yet to be formulated and would be subject to future consultation.

Resources – NERL

20. **Issue:** Does NERL have sufficient resources and skills to take on the UKADS role, and can this be done sufficiently quickly to avoid further programme delays? There are already too many ACPs and too much work designing new procedures. There is

a skill fade of airspace design personnel in the UK compared with other countries. NATS and CAA do not have the expertise to expeditiously design and approve numerous cutting-edge RNP-based procedures. **DfT/CAA response:** The Government announced in March 2025 that it was now working with NATS with the shared ambition for the UKADS to be up and running this year. Access to existing resources (including roles such as project managers as well as airspace specialists) was one reason for tasking an existing body in the form of NERL. As stated in the consultation document, as the UKADS builds capability and expertise, should it be insufficiently resourced to progress an ACP, it may well contract specialist consultancies for some work while still acting as overall sponsor and coordinator. Given the shortage of skilled airspace designers, it is likely that continuing opportunities will arise to work with the UKADS which may attract applicants from outside the UK. We anticipate that the UKADS would over time achieve the critical mass needed to be able to grow its own talent through in-house training and development.

Resources – CAA/DfT

21. **Issue:** Given current constraints, particularly with Instrument Flight Procedures, does the CAA (and where appropriate DfT) have the resources to accommodate the UKADS activity in a timely manner, including reviewing and approving onboarding plans? Could ACPs outside London be delayed if CAA resources prioritise the UKADS? **DfT/CAA response:** CAA resources are obviously finite, but we do not anticipate that the CAA would be the cause of delays. Indeed, there should be resource savings from the new approach of having a single sponsor for the London cluster.

UKADS remit

22. **Issue:** The consultation document did not properly explore the option for NERL to be confined to airspace design leaving ACOG to coordinate the masterplan and airports to progress ACPs. Given the UKADS is sponsor and airports are only a partner, how do you ensure that airports (with no responsibility or accountability) do not lose control of the process? Post-deployment, who owns the follow-up actions, including lessons learned and post-deployment changes? The UKADS may need to delegate some tasks to current sponsors in the short term – how will these be identified and managed fairly and transparently, how will the sponsors' capabilities be assured and how will the UKADS ensure such ACPs are consistent in quality, design and delivery timelines with the UKADS work? **DfT/CAA response:** We did consider the option of the UKADS being confined to design work alone, but rejected it for the reasons given on page 46 of the consultation document: in short it would not fully address the problem with the current airspace change model. It is important that airports retain a stake in the airspace change process. Throughout they will be in dialogue with the UKADS as their collaborative partner under agreed working arrangements. The partner airport will also retain specific responsibilities, including for some aspects of

consultation, by agreement with the UKADS. The partner airport would implement the change, but the UKADS, working with the partner, would carry out the post-implementation review stage of the CAP 1616 process. See pages 8 and 54–60 of CAP 3106, the consultation response document.

UKADS remit – design choices and resolving disputes

23. **Issue:** Against what objective criteria will UKADS design choices be taken? What weight will the UKADS accord to different factors when taking those decisions?
DfT/CAA response: The UKADS will adhere to existing law, policy and guidance, which is already well documented. That said, we have undertaken to consult on improvements to the effectiveness and proportionality of our process for changing airspace by September 2025, including changes needed to accommodate the UKADS.
24. **Issue:** Various partners who will be expected to own the ACP consultation and hazards or risks, as well as service the airspace, will likely have competing needs and priorities. There needs to be an appeal mechanism or an independent complaints adjudicator for when co-sponsors, NERL, airports or other stakeholders cannot agree on decisions and priorities or when a party feels it has not been treated fairly. **DfT/CAA response:** The consultation document CAP 3029 (paragraph 5.34) set out our views on dispute resolution. We are publishing further detail in a separate policy paper on UKADS governance and engagement ([UKADS 25/2](#)). This paper proposes that someone with a concern must first raise the issue with the UKADS. If this does not resolve the issue, and the issue relates to a matter of principle or general approach, then it could be raised by a member of the UKADS Advisory Board. However, an issue with a specific ACP should follow the approach set out in CAP 1616. The Advisory Board will have no decision-making role and will not get involved in decisions around individual ACPs. Similarly the DfT/CAA would not get involved in the UKADS design choices, other than through the ACP regulatory role in the airspace change process. Through the existing AMS governance structure, the DfT/CAA will have a regular, ongoing dialogue with NERL to ensure that any risks or items requiring co-sponsor decision or guidance can be escalated quickly, and that stakeholders are kept up to date with progress. There is the option of [judicially reviewing](#) a DfT/CAA decision.
25. **Issue:** If an airport rejects an airspace design this could cause lengthy delays to overall deployment. Even where an airport abides by the design, it may challenge the cost of implementing it. **DfT/CAA response:** The UKADS concept means it “holds the pen” on the single airspace design for masterplan airports within its scope. Not every airport will secure their first-choice design. The UKADS will need to work with airports to produce a single design that prioritises maintaining a high standard of safety, and secures system-wide benefits and overall network optimisation consistent with the AMS, that results in the most efficient and resilient airspace network possible, while giving due consideration to local circumstances and environmental

impacts. As a last resort there are existing powers under the Air Traffic Management and Unmanned Aircraft Act 2021 to compel progression of an ACP.

UKADS remit – ACP consultation

26. **Issue:** Handling of consultation needs to be clearer as to who is responsible or accountable for what. Given that airports are being asked to cover consultation costs, the UKADS must not impose an inappropriate standard for the consultation that imposes excessive cost. Airports may not be the direct beneficiaries of an ACP where the benefits are mainly environmental or accrue to the aircraft operators or another airport. There may well be situations where a London airport is best placed to manage a full consultation and understand the subtleties of its local community and geography, yet is unable to do that properly because of a lack of funding. For those partners choosing to have the UKADS take full control of consultation, it is important to have clear, transparent and fair charging models for the cost of consultation. Costs could impact smaller airports disproportionate to their revenue.
- DfT/CAA response:** Consultation must adhere to the requirements of the CAP 1616 airspace change process. We agree that consultation responsibilities and requirements for the UKADS and a given partner need to be set out clearly. As explained on pages 8 and 57–60 of CAP 3029, the consultation response document, we accept that some airports want to run their own consultations. The UKADS may agree with each airport partnering the ACP who has responsibility for which consultation tasks. The choice would depend on a number of factors including the airport's appetite to be responsible. We have undertaken to consult on improvements to the effectiveness and proportionality of our process for changing airspace by September 2025, and this will include changes needed to accommodate the UKADS, such as around consultation and engagement. However, the UKADS will be accountable for all aspects of delivering the single airspace design, other than the safety case and implementation of the change (or associated provisions of air traffic services). The UKADS will need to determine an appropriate standard for the approach and materials etc bearing in mind what is required for successful consultation, consistency between airports and reasonable cost, and also how costs are apportioned in different circumstances. Airports within the scope of the UKADS are not eligible for the Airspace Design Support Fund.

Impacts – environmental

27. **Issue:** There are risks to the interests of overflown communities from the creation of a powerful, industry-led change sponsor which would be remote from communities and required to prioritise industry objectives. Local community views would be more likely to be ignored by a centralised body. Merging all the ACPs into one would further distance airport communities from decisions which would make meaningful consultation difficult, because the ACP would be very complex and difficult for communities to understand, and full of irrelevant information. There will be a lack of proper accountability for health and environmental impacts and the UKADS needs to

be answerable to an independent body which can ensure that the interests of industry do not override the legitimate interests of overflown communities. NATS has not had an environmental remit in lower airspace and lacks relevant experience, expertise and local knowledge in relation to aircraft noise and local air quality.

DfT/CAA response: NERL will be held to account for the performance of the UKADS through the NERL licence and the governance process by DfT/CAA and other stakeholders through the existing AMS governance and new Advisory Board. The CAA is already the UK's independent specialist aviation regulator. The CAA will consult on a proposal to modify NERL's licence to require NERL to set the structure, membership and terms of reference of the Advisory Board. We would expect the Advisory Board to include representation on behalf of communities.

28. **Issue:** Local communities must have a tangible means of input to help shape proposals. CAP 1616 must not be watered down at all in respect of stakeholder involvement and engagement or in its environmental assessment requirements. The UKADS is an opportunity to embed the community voice in the process and ensure cumulative environmental impacts are taken into account. The UKADS proposals pay insufficient attention to the value of informal stakeholder engagement, in contrast to public consultation in the latter part of Stage 3. Clear and effective mechanisms are needed to ensure that noise and environmental benefits committed to in airspace modernisation processes are monitored and their delivery enforced. Commitments made to communities by an airport (such as through design principles) must be honoured; could they be lost if an airport design is overruled by a UKADS design decision? A separate environmental function within the UKADS risks introducing alternative environmental assessments to those prepared already by airports. The effects of aircraft noise have been given insufficient prominence. **DfT/CAA response:** Many comments were about the impacts of airspace change or aviation generally. While these comments have been considered carefully, the consultation document made clear that we were not consulting on that. It set out the current legal and policy framework (including the CAA's 'section 70' duties⁴ and Government guidance to the CAA on how it takes environmental impacts into account⁵) and the relationship between airspace design and local planning restrictions at airports. The UKADS will continue to follow the CAP 1616 process where environmental impacts are assessed and taken into account. Communities will still be consulted, and that consultation may still be carried out by airports working in partnership with the UKADS, except where the airport chooses the UKADS to consult on its behalf (see pages 8 and 57–60 of CAP 3029, the consultation response document). We have undertaken to consult further on improvements to the effectiveness and proportionality of our process for changing airspace by September 2025, and this will include any changes needed to accommodate the UKADS, such as addressing pre-

⁴ <https://www.caa.co.uk/commercial-industry/airspace/airspace-change/legislative-framework-to-airspace-change/>

⁵ <https://www.gov.uk/government/publications/uk-air-navigation-guidance-2017>

existing design principles. We need to mitigate the risk that the benefits of modernisation envisaged by the AMS – which includes potential benefits to overflow communities – are not realised because the process, or the way it is interpreted and applied, is too onerous or risk-averse.

29. **Issue:** Is there a contradiction between providing more airspace capacity and decarbonisation targets? **DfT/CAA response:** The main constraint on the volume of air traffic using UK airports is the operational or infrastructure capacity of airports. Subject to operational constraints (including safety), the design of airspace and the airspace change process do not specify, guarantee or limit future increases in the volume of air traffic using a piece of airspace at any given point in time. However, the volume of air traffic using an airport may be limited by specific statutory planning caps or defined operating conditions, where relevant. Airspace modernisation could reduce fuel burn and emissions, helping aviation to achieve net zero by 2050. The UKADS is not a decarbonisation mechanism in itself, but as a single guiding mind for modernised airspace design, it could instil confidence in delivery of airspace changes that will help to reduce carbon emissions per flight from aviation, as envisaged by the AMS.

Impacts – airspace design consultancy

30. **Issue:** The UKADS would reduce the number of contracts available to consultancies, risking a rapid exodus of skilled resources from the sector. Design work should be equitably distributed amongst the approved procedure design organisations as subcontractors so as not to put all eggs in one basket with a monopoly provider. Centralising airspace design under the UKADS may stifle competition and innovation by limiting opportunities for consultancies to provide specialised services. Consultancies may be required to transfer specialised knowledge or proprietary methodologies to the UKADS, raising concerns about intellectual property protection and loss of competitive differentiators. There is a risk that aviation consultancies no longer have the resources, skills or appetite for non-ACP APDO work. If the UKADS designs new IFPs at an airport which then wants them safeguarded, will the airport be faced with excessive, monopoly pricing by NATS because APDOs have exited the market? Would a consortium-led model, where ACP sponsors and airspace designers have the opportunity to contribute to airspace change and provide platform-specific or other technical expertise, be a more viable solution? If the UKADS subcontracts work, how will that be managed? **DfT/CAA response:** Currently resources and skills are thinly spread across multiple organisations and there is inconsistency of approach and quality of output, as the consultation document set out. While recognising the ‘monopoly’ argument put forward by some respondents, we believe that a single design entity would be more likely to give a better outcome in creating the holistic airspace the AMS envisages. While the UKADS is likely to need to subcontract in its early stages, we anticipate that it would over time achieve the critical mass needed to be able to grow its own talent through in-house training and development.

31. **Issue:** Existing APDOs will be unable to fulfil their contractual obligations, specifically IFP safeguarding and reviews to a range of client airports, a safety-critical function, if the UKADS takes on the specialist IFP staff who are in short supply. The ACP transition proposals do not mention whether the UKADS, DfT or CAA would cover the potential penalties incurred for breaking commercial arrangements between current ACP sponsors and consultancies. **DfT/CAA response:** Once an ACP is approved, an IFP is normally introduced with the airport managing the safeguarding of the IFP to ensure its safety and consideration against ongoing developments. The UKADS may deliver modernisation of London airspace over multiple deployments, and so an IFP may be assessed and approved some time before implementation. In the intervening period, it is likely that responsibility for the IFP's safety would not be handed over to the airport until implementation, although it is vital that the new IFP is accounted for in ongoing safeguarding to ensure it can be implemented safely.

Impacts – General Aviation

32. **Issue:** The UKADS should take into account GA considerations and not over-prioritise commercial or drone operators' desire for extensive establishment of controlled airspace which is, in practice, denied to GA traffic. **DfT/CAA response:** In respect of classification of UK airspace, the Air Navigation Directions⁶ require the CAA to seek to ensure that the amount of controlled airspace is the minimum required to maintain a high standard of air safety and, subject to overriding national security or defence requirements, that the needs of all airspace users are reflected on an equitable basis. This will therefore be reflected in associated guidance and policy, including oversight of the UKADS.

Impacts – Future Flight

33. **Issue:** The UKADS proposals only consider airports and not Future Flight. In initial planning for airspace change the UKADS and CAA need to be thinking strategically ensuring the AMS and Future Flight Strategy goals are met and avoid inadvertently creating obstacles to new entrants. London TMA modernisation is critical to unlocking the full potential of the UK's BVLOS drone industry. The proposed timeline for the second-phase UKADS poses a significant risk to ongoing trials and ACPs that are already at advanced stages, potentially hindering innovation and industry growth. The consultation document sets out a clear break in the expected evolution from the UKADS to an ultimate, extended-scope UKADS responsible for all airspace change in the UK, and acknowledges that much of the detail for that end-state is yet to be finalised. A fundamentally different regulatory approach from the ACP-based process may be needed for airspace integration to accommodate BVLOS operations – one which is outcomes-based and proportional to the risks and impacts in low altitude airspace. The drone industry funding a UKADS that would provide limited utility to drone operators is not ideal. A strategic pathway to accommodate eVTOL IFR flights

⁶ <https://www.caa.co.uk/media/lzrl3drs/caa-air-navigation-directions-2023.pdf>

is too pressing to be implicitly left to a future extended-scope UKADS, but is unlikely to be prioritised under the current framework, given the focus on resolving legacy inefficiencies. This could result in missed opportunities to integrate new entrants into the airspace during a once-in-a-generation redesign effort. **DfT/CAA response:** The consultation document recognised that one of the challenges for the current model of airspace change was the increasing demand from new types of airspace user to have routine access to an integrated airspace for all users, but no obvious sponsor to take forward or fund any changes to the airspace design needed to accommodate them. The UKADS could be a way of taking this forward, but the UKADS needs to be set up and established first before it can progress this. It would also need a suitable funding mechanism given our commitment to the 'user pays' principle. Achieving the integration objectives of the AMS is a whole separate, and very active, AMS workstream. We have undertaken to consult on improvements to the effectiveness and proportionality of our process for changing airspace by September 2025, and this includes the changes needed to accommodate the UKADS, enable aerospace innovation, and ensure those impacted by airspace change are fully involved.

Onboarding

34. **Issue:** The UKADS will not be able to merge the ACP development of multiple airports without unwinding previous decisions up to Stage 3 of the CAP 1616 process, thereby jeopardising the design process and compromising the optimisation of each airport's design. The UKADS should get involved before Stage 3 and review work at earlier stages in sufficient detail to ensure it is not deficient and does not undermine the whole merged ACP. **DfT/CAA response:** We recognise the significant challenge of merging multiple ACPs which may have had different approaches, methodologies and inconsistencies prior to Stage 3. Some respondents were sceptical that this was feasible or advisable. But this is the point of the UKADS – to adopt a holistic approach. All except one of the ACPs currently forming the London cluster have already progressed through Stage 2. The UKADS may need to carry out some refinement of Stage 2 designs to develop options that support a system-wide design, but the aim would be not to redo work that has already been done (or, at the very least, to minimise the amount of rework). The design rework process will form part of the September 2025 consultation on revisions to CAP 1616.
35. **Issue:** Will ACPs that have already progressed further than Stage 3 be reworked? Will the PIR (Stage 7) of Scottish and Manchester clusters be completed by the UKADS or by ACP sponsors? In what circumstances would the CAA reject an onboarding plan? **DfT/CAA response:** No London cluster ACPs have progressed beyond Stage 3. Relevant onboarding documentation will be published on the CAA airspace change portal. We do not envisage the UKADS taking on ACPs in the Scottish or Manchester clusters unless this would add value to their progression. The CAA might seek clarification on onboarding documentation around, for example, the methodology for transferring the data accumulated to date in the existing ACP.

Governance – Advisory Board

36. **Issue:** Can the Advisory Board be established prior to the UKADS starting work to ensure impartiality from the outset? Can MoD / airlines / airports / APDOs / communities / Future Flight / local government / manufacturers / non-governmental organisations (NGOs) be represented on the Board? How will the Advisory Board hold NERL to account, will this be against metrics, targets and a framework of expectations, and how will the Board escalate issues? Will there be a means of weighing competing interest and arbitration where needed? Will there be a forum whereby airport sponsors get to be informed of, and have an opportunity to comment on, both the design process and the design that is developing? **DfT/CAA response:** The Advisory Board will not be a decision-making body, but will provide an opportunity for stakeholders to raise issues. It will not resolve trade-offs in the design, or decide sequencing of deployment. The DfT/CAA will use established AMS governance arrangements, potentially developed from the dormant AMS Industry Modernisation Steering Group, to monitor how NERL is responding to issues raised. The CAA will consult on a proposal to modify NERL's licence to require it, through the UKADS, to set the structure, membership and terms of reference of the Advisory Board, the workings of which should be as transparent as possible. We are publishing further detail in a separate policy paper on UKADS governance and engagement, [UKADS 25/2](#).

Funding

37. The consultation document said that we would need to develop the funding details further in the light of consultation responses. The CAA will be consulting⁷ on initial proposals for modifying NERL's licence to support the implementation of the UKADS, including greater detail on the funding model (the proposed UK Airspace Design Charge and Airspace Design Support Fund). Below we cover some more general points raised.
38. **Issue:** Funds from the proposed UK Airspace Design Charge should be used to provide authoritative independent advice to non-expert communities and local authorities on the impacts of proposed changes. Scope of the fund should be expanded to include Future Flight. GA should not be charged for operating in the regions and airspace encompassed in the UKADS proposal. Central Government should provide the funding given that this is national infrastructure and modernisation benefits the wider economy. **DfT/CAA response:** The consultation document explained that airspace change follows a 'user pays' model. The purpose of the charge, which will mainly be paid by airlines using controlled airspace, is to cover certain costs of airspace change for eligible airports. In the future (as and when the

⁷ <https://www.caa.co.uk/commercial-industry/economic-regulation-and-competition-policy/national-air-traffic-en-route-services-nerl/ukads-licence-proposals/>

remit of the UKADS evolves), the Airspace Design Support Fund could pay towards ACPs needed to support Future Flight and GA-related operations.

39. **Issue:** it is not fair to expect airports outside the London cluster to deliver and fund their airspace changes while London cluster airports are progressed and funded by the UKADS. Some may just stop work on modernisation. **DfT/CAA response:** This is the purpose of the new Airspace Design Support Fund, which will also be funded by the new charge, from which eligible airports can seek funding. See policy paper [UKADS 25/3](#).

Second-phase UKADS

40. **Issue:** By the time the second-phase, extended-scope UKADS responsible for all UK airspace change is operational, NERL will have developed the required institutional knowledge. To avoid the risks and disruption of transferring from the initial UKADS to a wholly new entity, it might be preferable for NERL to continue with the extended UKADS role. Transferring resource, knowledge and funding mechanisms from the initial UKADS provided by NERL to the ultimate, extended-scope UKADS may not be an easy evolution. Some of the arguments for NERL as the UKADS could be undermined or reversed by the establishment of a separate bespoke organisation for the second-phase UKADS. This could disrupt ACPs in progress, in particular those outside London or supporting Future Flight. More certainty is needed on timescales for that extended-scope UKADS, including a roadmap, transition arrangements and what would trigger it. Would it prioritise emerging technologies such as eVTOL and drones? Would it redesign airspace from scratch? Geographical scope of the ultimate UKADS should be the UK Flight Information Regions/Upper Information Regions, to be clear that it is not limited to UK territorial airspace. What are the success criteria used for assessing the earlier UKADS? **DfT/CAA response:** No decisions have been made on the form of the second-phase, extended-scope UKADS, including whether it would be a new or existing body (such as NERL). The second phase would be conditional both on the outcome of a review of the first phase to determine the extent to which the UKADS has succeeded in delivering its objectives, and on further consultation on detailed proposals. Any second-phase, extended-scope UKADS would be responsible for all UK airspace change, defined by UK Flight Information Regions. Therefore that would include the integration of new and developing users such as eVTOL and drones and the incorporation of new technology where appropriate. Any transition would take into account the impacts on existing programmes. See pages 11 and 88–90 of CAP 3106, the consultation response document.

Technical

41. **Issue:** What role is envisaged for the UKADS in terms of infrastructure, for example, regarding the provision of conventional navigation aids (Very High Frequency Omnidirectional Range (VOR) and Distance Measuring Equipment (DME)) to support airspace modernisation and, indirectly, airspace change? **DfT/CAA response:**

Infrastructure is outside the scope of the UKADS, although the UKADS may need to sponsor an ACP linked to navigational aids (NAVAIDs).

42. **Issue:** Will the current 7000ft 'divide' between NERL and airports be removed or will NERL be a partner to the UKADS for access to the network? **DfT/CAA response:** UKADS is provided by NERL. Therefore it will be for NERL to organise how to connect airports within the scope of UKADS to the network.
43. **Issue:** How will the UKADS take the decisions that trade-off the competing interests of different airports, what factors will it consider and how will these be weighted? The number of route options for the London cluster and the degree of potential interaction is enormous and a degree of pragmatism will be needed if the UKADS is to come up with a design for consultation that meets the agreed design principles. Rigidly applying a process of cumulative impact assessment to justify down-selection of options is likely to prove impractical, time consuming and ultimately threaten successful delivery of the consolidated ACP. **DfT/CAA response:** We have undertaken to consult on improvements to the effectiveness and proportionality of our process for changing airspace by September 2025, and this will include changes needed to accommodate the UKADS.
44. **Issue:** Would the UKADS pursue (a) a harmonised transition altitude which could unlock significant benefits in climb and descent profiles, or (b) ICAO FIS alignment? **DfT/CAA response:** Once established, we envisage that the UKADS could take on state-wide changes in the medium term. These would need to be in line with the AMS and appropriately funded. At the present time it is too early to say what such changes may be.

Changes to the legal and policy framework in order to implement the policy decisions described in the consultation response document CAP 3106

45. **Issue:** What changes to the legal and policy framework might be required to implement the UKADS? **DfT/CAA response:** As required, and subject to further consultation in some cases, we need to consider amending or creating the following legislation, policy documents, and statutory requirements and guidance documents. We have indicated below (Yes/No) where further consultation will or will not be needed.

Legislation

- Transport Act 2000 section 98 (No)
- [New] Statutory Instrument to prescribe terms that the Secretary of State may modify in NERL's licence (No)
- Planning Acts; Town and Country Planning Circulars (Yes)
- Air Traffic Management and Unmanned Aircraft Act 2021 (Yes)

- The Conservation of Habitats and Species Regulations 2017 and The Environmental Assessment of Plans and Programmes Regulations 2004 (in respect of Strategic Environmental Assessment and Habitats Regulations Assessment) (Yes)
- National Parks and Access to the Countryside Act 1949 (National Parks duty) section 11A (Yes)
- Natural Environment and Rural Communities Act 2006 (Biodiversity Duty) section 40 (Yes)
- Wildlife and Countryside Act 1981 (Sites of Special Scientific Interest) section 28G–I (Yes)

Secretary of State delegated powers and Government policy documents

- Airports National Policy Statement (Yes)
- Air Navigation Directions 2023 (made under s66 Transport Act 2000) (No)
- Air Navigation Directions 2023 Call-in Guidance (No)
- Air Navigation Guidance to the CAA on its environmental objectives when carrying out its air navigation functions etc (Yes)
- Secretary of State Strategic Objectives (on geographical scope of airspace design services) (made under s70 Transport Act 2000) (Yes)

Secretary of State documents

- [Air Traffic Services Licence for NATS En route plc](#) – to add a new term (Yes)

CAA documents

- [Air Traffic Services Licence for NATS En route plc](#) – to add new conditions (Yes)
- [CAP 1711 Part 1 Airspace Modernisation Strategy 2023-2040](#) – including the AMS governance framework and sustainability objective (Yes)
- [CAP 1616 airspace change process](#) – including [new] requirements for single airspace designs covering multiple airports and [amended] guidance on CAP 1616 procedures) (Yes)
- [CAP 1991 Procedure for the CAA to review the classification of airspace](#) (Yes)
- [CAP 2156a Airspace change masterplan - CAA acceptance criteria](#) (Yes)
- [CAP 2156b Airspace change masterplan – assessment framework](#) (Yes)
- [New] UKADS airspace change proposal ‘onboarding’ process (No)
- [New] Airspace Design Services criteria, requirements and guidance (Yes)

Co-sponsor (DfT and CAA) policy documents

- [New] UKADS Governance and Engagement ([Policy Paper UKADS 25/2](#) published June 2025) (No*)
- [New] Airspace Design Support Fund ([Policy Paper UKADS 25/3](#) published June 2025) (No*)
- [New] Future of the Airspace Change Organising Group ([Policy Paper UKADS 25/4](#) published June 2025) (No*)

* subject to consultation on the NERL air traffic services licence.