

# UK Airspace Design Service: Future of the Airspace Change Organising Group

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## Summary

1. This paper sets out the DfT and the CAA's ("the co-sponsors") 'minded-to' position on the future of the Airspace Change Organising Group ("ACOG") upon the establishment of the UK Airspace Design Service ("UKADS"). The paper has been produced following consideration of the feedback provided to the joint DfT/CAA consultation.<sup>1</sup>
2. It is the proposed position of the co-sponsors that the residual services being provided by ACOG, following the forthcoming CAA consultation on the regulatory framework for the Airspace Change Masterplan ("MP")<sup>2</sup>, should be subsumed into the part of NATS (En-Route) plc ("NERL") providing the airspace design service.
3. The CAA will soon consult on initial proposals to implement the required NERL licence modifications and has committed<sup>3</sup> to consult on the regulatory framework for the MP<sup>4</sup> by September 2025.

## The requirement for coordination

4. ACOG was formed in 2019 as an impartial function of NERL to coordinate airspace change sponsors in progressing airspace change proposals ("ACPs") as part of the UK's 2018/2023 Airspace Modernisation Strategy ("AMS"). This coordination has largely been achieved through ACOG's development of the MP and supporting processes.<sup>5</sup> The CAA's acceptance of the MP establishes it within the AMS. Therefore, the MP, alongside the Air Navigation Directions<sup>6</sup>, and as detailed in CAP 1616<sup>7</sup>, is the criterion against which ACPs are regulated.
5. The formation of ACOG recognised the need to address a structural issue of airspace change in the UK whereby multiple individual ACPs were being submitted by multiple different sponsors within the same volumes of airspace. The result was a

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<sup>1</sup> [CAP 3029: Airspace modernisation: consultation on a UK Airspace Design Service](#)

<sup>2</sup> [CAP 2156a: Airspace change masterplan - CAA acceptance criteria](#) / [CAP 2156b: Airspace change masterplan – assessment framework](#)

<sup>3</sup> [CAP3085A: Letter from the office of the Chief Executive to the Prime Minister, January 2025: Supporting Growth Annex A](#)

<sup>4</sup> [CAP2312B: UK Airspace Change Masterplan Iteration 2](#)

<sup>5</sup> For example, the Cumulative Assessment Framework (CAF) and Safety Strategy.

<sup>6</sup> [The Civil Aviation Authority \(Air Navigation\) Directions 2023](#)

<sup>7</sup> [CAP1616: The Process for Changing the Notified Airspace Design](#)

lack of holistic airspace design thinking which caused difficulty in progressing ACPs where they overlapped with those of other (often competing) organisations with differing requirements. The concept of ACOG as a coordinator therefore emerged.

6. From its original focus on the southern areas of the UK, the MP grew into a single, UK-wide plan for all ACPs in the Future Airspace Strategy Implementation (“FASI”) programme incorporating 18 airport-led proposals alongside multiple complementary NERL network ACPs. The MP has evolved significantly with the single plan dividing into four distinct, regional clusters comprising London, West of England, North of England and Central Scotland allowing delivery in more manageable deployments. At the same time the number of airports has reduced with one cluster, in effect, becoming a cluster of one airport. The scope of the coordination activity required from ACOG has, therefore, correspondingly diminished.
7. Against this background and the resulting evolution of ACOG’s role, combined with HM Government’s drive to rationalise the UK’s regulatory landscape, the CAA has committed<sup>3</sup> to consult by September 2025 on improvements to the effectiveness and proportionality of processes for changing airspace to simplify and speed it up. This includes the regulatory framework for the MP<sup>2</sup>.

## Establishment of the UKADS

8. On 17 March 2025 the Chancellor announced that the Government would proceed with setting up the UKADS and, as set out in the Consultation Response Document<sup>8</sup>, the Secretary of State has decided to authorise NERL to provide the UKADS. Subject to CAA consultation on the NERL air traffic services licence, NERL will begin to stand up the UKADS in 2025 with the initial scope of designing modernised airspace in the London cluster of the MP. UKADS will do its own planning, coordination and reporting to the co-sponsors as the single change sponsor for the region. Consequently, there will be no ongoing role for ACOG in the London cluster, as referenced in the UKADS consultation (conducted at the end of 2024):

*“We envisage that UKADS1 would take over ACOG’s role of producing the masterplan in respect of the London cluster and coordinating any related ACPs. Perpetuating ACOG’s role for the London cluster would complicate, rather than simplify, the existing approach.”<sup>9</sup>*

9. Given that the UKADS is not expected to take over non-London clusters in the near future there remains, as established in the UKADS consultation, a continuing requirement for ACOG’s functions. It is important that the MP clusters outside of London continue to receive support from the residual processes and tasks undertaken by ACOG that, subject to the outcome of the forthcoming CAA

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<sup>8</sup> [CAP 3106: Airspace modernisation: Outcome of the consultation on a UK Airspace Design Service](#)

<sup>9</sup> [CAP 3029: Airspace modernisation: consultation on a UK Airspace Design Service para 5.11](#)

consultation on the regulatory framework for the MP<sup>2</sup>, add value to and directly support these clusters:

*“...in respect of the non-London clusters we envisage ACOG’s role to continue as now for the time being, that is, to develop the masterplan and coordinate the related ACPs and their sponsors. It would continue to operate as a unit within NERL.”<sup>10</sup>*

10. ACOG would, however, be responsible for coordinating fewer clusters, and these clusters are less complex than the London cluster. They are at different stages of development and will require different levels of coordination support from ACOG. Consequently, it is therefore expected that the scope and scale of the tasks currently performed by ACOG will have reduced by the end of 2025.

## Simplification and reducing complexity

11. Subsequent to publication of the UKADS consultation, HM Government released an updated Action Plan establishing a commitment to reducing regulatory burden faced by industry:

*“We will simplify regulatory structures. We want a regulatory system which is easier to navigate for businesses, and reduces duplication.”<sup>11</sup>*

12. Responses to the UKADS consultation<sup>12</sup> highlighted concerns regarding the potential duplication of effort and the unnecessary complication caused by having two distinct airspace change related functions provided by NERL in the same space with differing remits, governance and scope. This duplication of effort is at odds with both HM Government’s simplification agenda and the AMS strategic objectives.<sup>13</sup>
13. The impartiality of ACOG is a key feature of its ability to coordinate airspace modernisation successfully. This requirement for transparent separation from NERL’s other business areas has also been recognised as critical to the success of the UKADS:

*“UKADS1 must be impartial, making decisions independently, based on evidence and transparent processes, and in line with relevant guidance. Any potential or perceived conflicts of interest need to be mitigated to ensure it is credible and trusted to deliver.”<sup>14</sup>*

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<sup>10</sup> [CAP 3029: Airspace modernisation: consultation on a UK Airspace Design Service para 5.14](#)

<sup>11</sup> [A new approach to ensure regulators and regulation support growth - GOV.UK](#)

<sup>12</sup> [CAP 3106: Airspace modernisation: Outcome of the consultation on a UK Airspace Design Service - Chapter 3](#) – see, for example, comments from Prospect.

<sup>13</sup> *Simplification, reducing complexity and improving efficiency* – [CAP1711: Airspace Modernisation Strategy 2023–2040 Part 1: Strategic objectives and enablers](#)

<sup>14</sup> [CAP 3029: Airspace modernisation: consultation on a UK Airspace Design Service para 8.16](#)

14. Subsuming the residual tasks of ACOG into the newly formed UKADS would, therefore, provide an opportunity to reduce the risk of duplication of effort within NERL while enabling the continued delivery of a fair and transparent airspace coordination function to the MP clusters outside of the UKADS remit.

## Future position of ACOG

15. The co-sponsors recognise that there will remain a requirement for ACOG's functions until such time as the non-London clusters successfully conclude their ACPs, or the scope of UKADS is widened to incorporate the remaining MP clusters. However, the co-sponsors also recognise that requiring NERL, through its licence, to maintain a separate and impartial ACOG in addition to providing the UKADS would be disproportionately burdensome. It would risk duplication of effort by NERL (and by the co-sponsors in their oversight), inefficient operations and processes through overcomplication, and confusion among stakeholders. Ultimately it is potentially detrimental to the efficient modernisation of UK airspace.
16. As established in the UKADS Consultation Response Document<sup>8</sup>, it is therefore the co-sponsors' 'minded to' position that **the residual services being provided by ACOG, subject to the forthcoming CAA consultation on the regulatory framework for the MP (CAP 2156a/b), should be subsumed into the part of NERL providing the airspace design service, with a reduced scope and scale.** Subject to the CAA's forthcoming consultations on the masterplan and NERL licence, it is proposed that NERL's current obligation to deliver ACOG would:
  - a. reduce in area to exclude the London cluster
  - b. be scoped to only providing those residual tasks that demonstrably add value
  - c. no longer be required to be in a separate impartial unit in order that NERL can resource these residual tasks within the unit providing the UKADS.
17. This transition would simplify oversight processes, facilitate knowledge transfer between ACOG and the UKADS and improve efficiency of resource utilisation. It would potentially help to pave the way for extending the UKADS scope to other clusters as envisaged in the UKADS consultation, while ensuring that the other non-UKADS MP clusters continue to receive the support they need from the ACOG processes that have been shown to add value.
18. Subsuming the residual tasks of ACOG into the part of NERL providing the UKADS (subject to NERL's HR policies and processes) would also help protect those skills within the ACOG team still needed despite the reduced scale and scope, and potentially help the UKADS to build expertise more quickly in other areas that will be important to it.

19. The CAA will soon consult on initial proposals to implement the required NERL licence modifications and has committed<sup>3</sup> to consult on the regulatory framework for the MP by September 2025.