

Published by the UK Civil Aviation Authority, June 2025 on behalf of the Department for Transport and UK Civil Aviation Authority, co-sponsors of airspace modernisation.

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First published June 2025

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Summary of the consultation outcome

1. The Department for Transport (DfT) and the UK Civil Aviation Authority (CAA)¹ have carefully considered the responses to our consultation and have decided to create a new UK Airspace Design Service (UKADS). This will be tasked to NATS (En Route) plc (NERL) through a change to its air traffic services licence.
2. Below we summarise the high-level outcomes of the consultation by topic. Where we can, we have explained how we intend to proceed, and what we are changing in light of the consultation, with a cross-reference to the consultation questions. There is still work to do to establish the UKADS. We have therefore created a UKADS webpage² where we will post progress updates and other relevant information as a one-stop repository.
3. Proposed modifications to the NERL licence to bring the UKADS into effect will be the subject of a new focused CAA consultation.³

Overall concept of a UKADS

The Government has decided to proceed with the creation of a UKADS to improve delivery confidence in airspace modernisation (question 1).⁴

4. There was general support for a single airspace design entity in principle (for example, 51% of responses said it would, and 33% said it maybe would, improve delivery confidence in airspace modernisation). Respondents saw it as a way to reduce fragmentation, ensure consistency, improve efficiency and increase speed of delivery compared to the current process. They highlighted the benefits of airspace modernisation that a UKADS will help facilitate, such as fewer delays

¹ Where we say 'we' and 'our' in this document, we mean both the DfT and the CAA.

² www.caa.co.uk/ukads

³ <https://www.caa.co.uk/commercial-industry/economic-regulation-and-competition-policy/national-air-traffic-en-route-services-nerl/ukads-licence-proposals/> The consultation has not yet commenced.

⁴ The CAA's CEO wrote to the Prime Minister on 15 January 2025 setting out what the CAA can do to further improve UK economic growth and investment. One of five areas of action was airspace modernisation, including a commitment to establish a UKADS to accelerate and enhance the airspace changes that are vital to achieving modernisation. www.caa.co.uk/cap3085 www.caa.co.uk/cap3085a On 17 March 2025, the Government confirmed that:

- it will establish a UKADS and Support Fund, and that it was now working with NATS with the shared ambition for the UKADS to be up and running this year
- by September 2025, the CAA and DfT will consult on a package of changes to the process for making airspace design decisions more proportionate, while retaining the important principles of a transparent, evidence-based process that will involve all stakeholders.

<https://www.gov.uk/government/publications/a-new-approach-to-ensure-regulators-and-regulation-support-growth>

and progress towards net zero. Some highlighted the need for more details in the proposal. Some said that the integration of new Future Flight technologies was not sufficiently addressed.

5. Other respondents highlighted issues related to the specifics of the proposal rather than the concept of a single entity, such as concerns around the lack of clarity on how the UKADS, as part of NERL, would ensure transparency, maintain impartiality and balance competing interests; and also, how it would adequately consider environmental impacts and community involvement, especially in the complex London airspace.
6. In light of the consultation responses, we will:
 - clearly define the UKADS mandate, objectives and accountability mechanisms to ensure transparency and impartiality
 - address concerns about how the UKADS will balance operational, environmental and community considerations in airspace design
 - clarify the scope of UKADS authority and how it will interact with existing regulatory frameworks.

The UKADS scope and priorities in two phases

The ultimate scope of the UKADS⁵ is that it becomes responsible for progressing all airspace change proposals (ACPs) in UK airspace. In the short term, subject to the licence modification process, the scope of the UKADS will be the London TMA region⁶, with the airports forming the London cluster of the airspace change masterplan as a priority. We propose that the UKADS will also subsume the Airspace Change Organising Group's coordination role for other masterplan clusters (see Policy Paper [UKADS 25/4](#) for further information).

7. There was general recognition from respondents that the airspace around London was the modernisation priority. However, many respondents questioned whether it was appropriate for the UKADS to start with the most complex airspace.
8. We expect the UKADS to build its capability over time and for its scope to be broadened (whether geographically or in terms of the types of ACP) to other

⁵ Legally the UKADS will be a function of NERL and any licence obligations fall on NERL itself. The same applies to ACOG. For clarity we refer in this document just to UKADS (or ACOG), rather than to the UKADS (or ACOG) function of NERL etc.

⁶ As defined in the consultation document CAP 3029, "London TMA region" means the London Terminal Control Area (generally abbreviated to London TMA), plus adjoining airspace serving neighbouring airports (for example, Bournemouth and Southampton) that is outside the London TMA but has interdependencies with the London TMA.

ACPs deemed a priority. This could be any other masterplan clusters, or other Airspace Modernisation Strategy (AMS)⁷ or government priorities (questions 2 to 4). We propose that the NERL air traffic services licence would be modified such that the UKADS scope could be changed without a further licence modification (for more information, see the CAA's Initial Proposals for Modifying the NERL licence⁸). To accommodate the need to broaden the UKADS scope over time, we will proceed with a two-phase approach (questions 5 and 6). In the first phase we will require NERL to establish the UKADS as soon as possible to provide airspace design services (question 7). We will consider developing in parallel detailed proposals for an extended-scope UKADS that could be responsible for sponsoring all airspace change in the UK, but these detailed proposals would be subject to further consultation.

9. The UKADS will 'hold the pen' on airspace design changes for ACPs within its scope, which means resolving design conflicts through trade-offs according to its mandate.⁹
10. The consultation document proposed that ACOG would continue its role of coordinating masterplan ACPs, except in respect of the London cluster of the airspace change masterplan, where the UKADS would supersede it (question 8). We are adopting this approach, and in the interests of proportionality, the residual ACOG coordination role for non-London clusters will also be subsumed into NERL, without the need for an impartial unit.
11. The CAA will therefore consult on proposed modifications to the NERL licence to:
 - insert requirements to provide the UKADS functions, subject to which, the geographic scope for NERL to provide the UKADS as airspace designer and change sponsor will, in the short term, be the London TMA region, and
 - insert a revised coordination (but not design or sponsor) role for ACPs in other masterplan clusters, removing the requirement for a separate unit.
12. Our reasoning is that it would be disproportionate to require NERL, through its licence, to maintain both ACOG to coordinate masterplan clusters outside London and the UKADS to design the airspace for the London cluster. That

⁷ www.caa.co.uk/ams

⁸ <https://www.caa.co.uk/commercial-industry/economic-regulation-and-competition-policy/national-air-traffic-en-route-services-nerl/ukads-licence-proposals/> The consultation has not yet commenced.

⁹ That mandate will be to submit a single design that:

- prioritises maintaining a high standard of safety; and
- consistent with the AMS, secures system-wide benefits and overall network optimisation that results in the most efficient and resilient airspace network possible, while giving due consideration to local circumstances and environmental impacts.

would risk inefficient duplication of effort by NERL (and by the co-sponsors in their oversight) and confusion among stakeholders. ACOG's role is also likely to diminish over time. We have been reviewing which elements of the masterplan continue to add value. This will be part of a wider package of changes we will be proposing later this year to improve the effectiveness and proportionality of our process for airspace change.¹⁰

13. NERL, as the provider of the UKADS, will be the sponsor of the single airspace design within its scope. This may include any new ACP that has a dependency on the single design already being sponsored by the UKADS. However, its inclusion in scope is not automatic; an ACP that is not urgent or is of local rather than strategic benefit may not be prioritised. In such cases, the proposer of an ACP can – at least until a future time when the UKADS undertakes all ACPs – sponsor the ACP themselves through the CAP 1616 process (question 9). Any changes proposed would need to be consistent with the work of the UKADS.

Tasking UKADS to NERL

14. Of the responses we received, 58% agreed, or agreed subject to additional considerations, with our proposal that NERL take on the initial UKADS task. NERL was described as being best placed for the role, with the required experience and skills. Some respondents highlighted potential conflicts of interest related to NERL's structural setup, suggesting also that the proposal would give NATS a monopoly in airspace design. Many respondents emphasised the need for appropriate governance and oversight to make NERL properly accountable – given that the UKADS would need to balance the competing interests in ACPs (such as environmental impact, capacity and fuel savings) and what might be in NATS's own specific interests. Some responses expressed concerns about NERL's ability to deliver both from a risk of insufficient resources to undertake this role and from its track record on delivery of airspace and technology modernisation. As explained below, through the governance structure the DfT and CAA will hold the NERL Board to account for the performance of the UKADS.

Potential Heathrow expansion

15. The UKADS consultation took place before the Government's 29 January 2025 announcement supporting a possible third runway at Heathrow.¹¹ Any plans and timetable for a third runway may influence the short-term scope of the London

¹⁰ See footnote 4 and the current criteria for accepting the masterplan into the AMS, CAP 2156a and CAP 2156b. <https://www.caa.co.uk/commercial-industry/airspace/airspace-modernisation/airspace-change-masterplan/assessment-of-the-masterplan/>

¹¹ <https://www.gov.uk/government/news/government-backs-heathrow-expansion-to-kickstart-economic-growth>

TMA region set out above, because a third runway will likely require redesigned airspace and therefore may require the UKADS to sponsor an airspace change proposal.¹² While this further strengthens the case for prioritising the London TMA region, it could disrupt current timescales and, maybe, when the UKADS could take on the London cluster ACPs. The DfT and CAA will continue to keep this under review, retaining the flexibility to amend the short-term scope for the UKADS if needed.

Remit for the UKADS including ACP consultation

NERL, as the provider of UKADS, will be the sponsor of the single airspace design within its scope (question 10).

16. The airport, air navigation service provider or organisation currently proposing an ACP will be a 'partner', with whom the UKADS, as sponsor, will work closely. The UKADS, acting collaboratively, will take on all aspects of delivering an ACP other than the safety case, implementation of the change (or associated provisions of air traffic services), and potentially some elements of consultation and engagement (question 11). The UKADS will need appropriate resource and expertise to lead and collaborate on a range of airspace change activities.
17. ACPs will remain subject to consultation and engagement requirements in accordance with the airspace change process. The UKADS will have overall accountability, coordinating consultation and engagement across airports as needed, and ensuring consistency of messaging, formats and common elements. Under partnering arrangements, the UKADS will agree with each airport or other organisation where responsibility rests for consultation and engagement tasks.
18. The views of respondents varied on ACP consultation. Some agreed that airports should retain consultation responsibilities because of their local knowledge and to maintain long-established community relationships, amid concern that community groups would be marginalised if there was a change. Some highlighted the need for the UKADS to have centralised accountability, or for joint consultation efforts balancing the UKADS system-wide perspective with local insights. Others saw value in the UKADS leading the consultation and engagement processes to ensure consistency.
19. The CAA will set out (in new CAP 1616 guidance, see below) the respective roles and terminology involved in the partnership arrangements between the UKADS and its partners. The guidance will ensure that consultation is kept proportionate and adds value, including taking into account meaningful local

¹² For the avoidance of doubt, Gatwick has confirmed that no new ACP is required as a result of any decision on its northern runway.

community engagement. It will be for the UKADS and relevant partner airports to discuss the costs relating to activities as part of any partnering arrangements.

Transition arrangements

Before NERL can commence providing airspace design services, as required, and subject to further consultation in some cases, we need to consider amending or creating various legislation, policy documents, a package of changes to the process for changing airspace design, and propose modifications to NERL's air traffic services licence.

20. For the London TMA region, the UKADS will start a single ACP from the beginning of stage 3 of the CAP 1616 airspace change process which will incorporate ACPs in the London cluster of the airspace change masterplan (questions 12 and 13). This will therefore be prior to the stage 3 consultation phase of CAP 1616. The UKADS will then sponsor the ACP through the remaining stages of the airspace change process.
21. The CAA is developing a process for the 'onboarding' of London cluster ACPs to the UKADS (question 14). As described in the consultation document, the UKADS will review the ACPs in the cluster and refine them as needed for consistency. We expect that the CAA would adopt a similar approach for any other ACPs the UKADS takes on in the medium term.

CAP 1616 airspace change process

The CAA's CAP 1616 airspace change process will continue to form the basis of the regulatory framework, adhering to the requirements on safety, environmental, economic and operational assessment. To address the specific circumstances of a single design entity with multiple partners, the CAA will, subject to consultation, introduce new CAP 1616 guidance¹³ applicable only to UKADS-sponsored ACPs (question 15).

22. Respondents highlighted the need to amend the airspace change process to accommodate the UKADS and to ensure its success. They expressed concerns about the challenge of applying what they saw as an overly cumbersome process to the extensive, complex airspace change involving multiple major airports that is required for London airspace. Many comments related to CAP 1616 generally rather than specifically in the context of the UKADS, but noted that CAP 1616 was not designed for ACPs affecting multiple airports.

¹³ One of the commitments in the 15 January 2025 letter from the CAA's CEO to the Prime Minister was, by September 2025, to consult on improvements to the effectiveness and proportionality of the CAA's process for changing airspace to simplify and speed it up. www.caa.co.uk/cap3085
www.caa.co.uk/cap3085a This was confirmed by the Government's announcement on 17 March 2025. <https://www.gov.uk/government/publications/a-new-approach-to-ensure-regulators-and-regulation-support-growth>

23. We have considered the scale of the UKADS task to successfully modernise the design of the complex airspace in the London TMA region. We have also considered stakeholder feedback about the airspace change process, including from industry and from those representing overflowed communities. The consultation document sought views on the likely need to amend and/or supplement CAP 1616 in order to accommodate the UKADS. We accept that a revised regulatory framework needs to be put in place as quickly as possible if the UKADS is to make progress and this will include updating CAP 1616.

Governance

The DfT and CAA will hold the NERL Board to account for the performance of the UKADS. NERL will be responsible through the obligations in its licence, and NATS will be indirectly responsible through its ownership of NERL. UKADS activities will be subject to DfT/CAA oversight through existing AMS governance arrangements, and will include regular, transparent progress reporting. The set-up within NERL and the governance arrangements will be designed so that the UKADS is fair, acts in the interests of the UK aviation system as a whole, and is effective in progressing airspace change without the potential for conflicts of interest (questions 16 and 17). The UKADS will make decisions based on evidence and transparent processes, and in line with DfT/CAA guidance. See Policy Paper [UKADS 25/2](#) for further information.

24. While respondents overall considered the proposed governance structure to be adequate or requiring only minor adjustments, many pointed out areas of complexity and potential vulnerabilities that could undermine oversight and accountability. The role and composition of the Advisory Board was a common topic. It was seen as an important mechanism to ensure that stakeholders can hold the UKADS to account. Composition was variously suggested to include representation from airlines, airports, overflowed communities, local government, national environmental groups, Future Flight representatives, independent experts and others. Some responses recognised that an overly broad Advisory Board could complicate decision-making processes and potentially slow down modernisation.
25. The DfT and CAA will require NERL, through the UKADS, to set the structure, membership and terms of reference for the Advisory Board. The Advisory Board will not be a decision-making body. The DfT/CAA will use established AMS governance arrangements to monitor how NERL is responding to issues raised.
26. While the UKADS will be expected to make choices relating to the design of airspace, responsibility for regulatory decisions on ACPs will remain with the CAA. In the event of a dispute between the UKADS and another stakeholder, the UKADS will present to the CAA, as decision maker, its airspace design proposal(s), along with a supporting rationale for its design choices and an articulation of the dispute. The designated service provider of the airspace that is

the subject of any design change decision made by the CAA will be required to implement the airspace design.

Funding for UKADS and UK Airspace Design Support Fund

Subject to the licence modification process, we will create a new UK Airspace Design Charge paid by airspace users (question 18), which will be used to:

- meet the efficient costs of NERL to provide an airspace design service, and
- capitalise a new UK Airspace Design Support Fund¹⁴, which we anticipate being administered by NERL, to cover relevant costs of the sponsors of eligible UK airport ACPs that are outside the scope of the UKADS (see Policy Paper [UKADS 25/3](#) for further information).

27. The statutory processes for this include further detailed consultation with those potentially affected by the new charge, including on the level of the charge and how this has been determined, reflecting additional research on anticipated costs in light of a general consensus that the £10m–£20m per annum estimate was too low (question 19).¹⁵
28. When the scope of the UKADS evolves, we will consider whether and how the UK Airspace Design Support Fund and associated charging mechanism might be adapted in support of the objectives of the AMS.

Extended-scope UKADS

The consultation set out how the scope of the UKADS could be extended in the future. An extended-scope UKADS could have responsibility for sponsoring all airspace change in the UK (question 20). As indicated in the consultation, primary legislation would likely be required to facilitate this, and we will consider seeking such powers. No decisions have been made on the detailed form yet, including whether it would be a new or existing body.

29. We will consider developing detailed proposals for an extended-scope UKADS in parallel with the mobilisation of the initial UKADS. These would include the DfT and CAA reviewing the performance of the UKADS in delivering its objectives. The detailed proposals would also be subject to further consultation in future.

¹⁴ On 17 March 2025, the Government confirmed that it will establish a UKADS and Support Fund. <https://www.gov.uk/government/publications/a-new-approach-to-ensure-regulators-and-regulation-support-growth>

¹⁵ See Chapter 9 of CAP 3029 www.caa.co.uk/cap3029 and Chapter 4 of CAP 3063 www.caa.co.uk/cap3063.

Regulatory Impact Assessment

We have updated the Regulatory Impact Assessment to take account of comments we received and to ensure it accurately reflects the latest policy position (question 21). This is being published as CAP 3106a alongside this consultation response document.¹⁶

Other themes that emerged

Many respondents raised specific suggestions or questions about how a UKADS would be set up and run, and its potential impacts. We have summarised a representative selection of these in a Q&A document [UKADS 25/1](#), with DfT/CAA responses.

30. The topics covered include the themes above, and also some more specific aspects, such as:
- impacts on the environment
 - impacts on airspace design consultancies
 - integration of Future Flight/new technology
 - resources and expertise of NERL and the CAA
 - technical issues
 - changes to the legal and policy framework.

Next steps

31. We are committed to establishing the initial UKADS operating model as part of NERL as soon as possible. We will therefore be engaging regularly with NERL to ensure it can mobilise UKADS by the end of 2025 and to work up transition arrangements.
32. The licence modifications and the new UK Airspace Design Charge will require separate consultation and decisions in accordance with the statutory processes provided for in the Transport Act 2000. These include:
- a CAA consultation on initial proposals for modifications to the NERL licence¹⁷
 - a CAA statutory consultation on actual licence modifications and corresponding final decision
 - the laying of two Statutory Instruments relating to the Transport Act 2000 to enable the necessary changes to the NERL licence
 - a DfT consultation on modifying certain terms in NERL's licence to enable the establishment of the UKADS.

¹⁶ CAP 3106a Final stage de minimis assessment www.caa.co.uk/cap3106

¹⁷ <https://www.caa.co.uk/commercial-industry/economic-regulation-and-competition-policy/national-air-traffic-en-route-services-nerl/ukads-licence-proposals/> The consultation has not yet commenced.

33. By September 2025, the CAA will consult on a package of changes to improve the effectiveness and proportionality of the process for airspace change, including the CAP 1616 airspace change process. The Secretary of State will consult on measures which will be reflected in revised Air Navigation Directions and Air Navigation Guidance.
34. We recognise that there is already considerable modernisation work underway as part of the airspace change masterplan. While the UKADS is being introduced, it is crucial for timely implementation of airspace modernisation that sponsors continue to progress their ACPs to already agreed timelines. In implementing the UKADS proposals we aim, as far as possible, to avoid work already undertaken on ACPs having to be redone.
35. We will post progress updates and other relevant information on the UKADS webpage¹⁸ as a one-stop repository.

¹⁸ www.caa.co.uk/ukads

Chapter 1

The consultation and our analysis methodology

The consultation

- 1.1 This was a joint consultation by the DfT and UK CAA as co-sponsors of airspace modernisation. It concerns our proposal to introduce a single entity for modernising the design of UK airspace – which we are calling the **UK Airspace Design Service (UKADS)**. The consultation sought views on what the UKADS could do and how we might set it up.

Purpose of this document

- 1.2 This document sets out an analysis of the responses to the consultation and, having taken those responses into account, some high-level outcomes. Some of the detail remains a work in progress.
- 1.3 The document begins with a high-level summary of how we are responding to the consultation. The detail is in three chapters and an appendix:
- Chapter 1 summarises the consultation, its purpose and context, who we engaged in advance and how we analysed responses.
 - Chapter 2 explains who responded to the consultation.
 - Chapter 3 looks in detail at what the responses told us, including:
 - the key themes we identified from multiple-choice and free-text responses to the questions we asked
 - selected direct quotes from responses, where we have permission to publish
 - some high-level outcomes of how we plan to proceed in the light of this analysis.
- 1.4 More specific suggestions or questions that we received about how a UKADS would be set up and run, and DfT/CAA comments where we are able to respond at this stage, can be found in the form of a Q&A on the CAA's UKADS webpage.¹⁹

¹⁹ www.caa.co.uk/ukads

Duration and structure of the consultation

- 1.5 The consultation opened on 22 October 2024 and closed 20 December 2024 (a few days later than originally advertised, to accommodate some late responses), giving a consultation period of eight weeks. We sought to make the consultation as accessible as possible by presenting the key points on the CAA's dedicated consultation website.²⁰ We published a longer consultation document (CAP 3029) for stakeholders wanting more detail.²¹
- 1.6 Accompanying the consultation was a Regulatory Impact Assessment of the potential impacts of our proposals. We published this separately as an annex²² to be read in conjunction with the consultation document.
- 1.7 The questions included some multiple-choice answers and the opportunity to submit comments by completing text boxes. Some stakeholders preferred not to be constrained by the questions alone and sent 'off-line' responses by email. While we have taken account of these submissions, those that did not answer the multiple-choice questions have necessarily been omitted from the charts in Chapter 3.
- 1.8 In the interests of transparency, we published all responses as they were received, where we were given permission to publish. All responses were shared with the DfT, CAA and relevant employees of a consultancy firm that we contracted to assist with the UKADS project.

CAA complementary consultation proposing changes to the NERL licence

- 1.9 On 21 November 2024, the CAA published a complementary consultation. This provided illustrative information on changes to NERL air traffic service licence obligations, costs and charges that might be needed to implement the proposals set out in the UKADS consultation.²³ It was accompanied by a report commissioned from the consultancy Egis, which assesses NERL's potential incremental costs of providing the UKADS for the London TMA region and of capitalising the UK Airspace Design Support Fund. This complementary consultation closed on 9 January 2025.

²⁰ <https://consultations.caa.co.uk/policy-development/ukads-consultation/>

²¹ CAP 3029 Airspace modernisation: consultation on a UK Airspace Design Service. www.caa.co.uk/cap3029 CAP 3029 includes explanations of the terms used in this response document.

²² CAP 3029a Regulatory Impact Assessment www.caa.co.uk/cap3029a

²³ <https://www.caa.co.uk/commercial-industry/economic-regulation-and-competition-policy/national-air-traffic-en-route-services-nerl/ukads-licence-proposals/>

CAP 3063 Economic Regulation of NERL: Illustrative proposals for modifying the licence to support the implementation of a UK Airspace Design Service. <https://www.caa.co.uk/cap3063>

- 1.10 The CAA received 11 responses to this complementary consultation which have been published on the CAA website.²⁴ The responses commented in detail about the proposed changes to the NERL licence, including the funding arrangements, and included themes common to both consultations. While the two consultations relate to the UKADS, in the interests of clarity we have not sought to summarise the responses to the licence consultation in this document.
- 1.11 These 11 responses will inform a further CAA consultation about modifications to the NERL licence to reflect the mature policy position. Changes to the NERL licence will also require an additional statutory consultation and corresponding final decision, as well as two statutory instruments to amend the Transport Act 2000.

Outline of the proposal

- 1.12 Our proposal was to set up the UKADS in two phases.²⁵
- 1.13 In the first phase, the initial operating model for the UKADS function (referred to as UKADS1 in the consultation) would be established as soon as possible and tasked to NERL through a change to its air traffic services licence. The scope of the UKADS would initially be to take forward (sponsor) ACPs to modernise the complex airspace around London. Subject to the UKADS capability and capacity, the DfT and CAA might expand this scope in the future.
- 1.14 The UKADS would take on all aspects of each ACP, except that the safety case and implementation would be carried out by the airport, air navigation service provider or other initiator of the change, with the UKADS having overall responsibility. Depending on the circumstances, aspects of stakeholder engagement may also be undertaken by the airport, air navigation service provider or other initiator of the change under the direction and with the support of the UKADS, such as taking the lead on consulting with their stakeholders.
- 1.15 The second phase would be to establish the end-state operating model for the UKADS function to be responsible for sponsoring and progressing all ACPs in the UK. This would be likely to require primary legislation and we will consider seeking such powers. Implementation of this model would take account of a review of the performance of the first phase and the detail would be developed

²⁴ <https://www.caa.co.uk/commercial-industry/economic-regulation-and-competition-policy/national-air-traffic-en-route-services-nerl/ukads-licence-proposals/>

²⁵ The consultation document referred to these phases as UKADS1 and UKADS2 so that we could be clear which phase respondents were referring to in their comments. Now that we are going ahead with the UKADS, we are dropping this terminology and just referring to the UKADS. However, we are still developing a second-phase UKADS subject to the caveats explained in the text.

over a longer timeframe, in parallel with the operation of the first phase. The detailed proposals would be subject to further consultation in the future.

A new airspace charge funding ACPs UK-wide

- 1.16 Alongside our proposals for the UKADS, we proposed to reform the funding of ACPs UK-wide by creating a new UK Airspace Design Charge which would:
- meet the efficient costs of NERL to provide an airspace design service, and
 - capitalise a new UK Airspace Design Support Fund to cover relevant costs of the sponsors of eligible UK airport ACPs that are outside the initial scope of the UKADS.

Stakeholder engagement

- 1.17 Prior to launching the consultation, we held two rounds of workshops with a range of stakeholders in September and December 2023. These helped us understand views about the challenges of airspace modernisation using the current model; share ideas for reform; and test initial conclusions from the UKADS policy thinking to date. The stakeholders included airports, air navigation service providers, airlines, local communities, General Aviation, the military, new or rapidly developing users of airspace, and others with an interest in airspace design. A summary of views from these workshops was at Appendix A of the consultation document. We also raised the subject for information at other aviation meetings held on a regular basis and have continued to do so.
- 1.18 To encourage a wide engagement with the consultation itself, on the day of publication in October 2024, the CAA and DfT published a press release, invited views from approximately 1,350 individuals and organisations through a direct email and a further 21,300 through the CAA's Skywise alerts platform.
- 1.19 We also held a webinar on 20 November 2024, while the consultation was in progress, at which we ran through the proposals and took questions. We made available a recording of the webinar for those who could not attend.²⁶

Consultation questions

- 1.20 Of the 21 consultation questions²⁷, 18 invited a multiple-choice answer. All 21 invited free-text comments.

Methodology for analysing responses

- 1.21 DfT and CAA staff and our appointed consultants read the responses in full, listing the topics, concerns and comments raised within them, which were

²⁶ <https://www.youtube.com/watch?v=Ml1ZQnMLkx4>

²⁷ The questions can be downloaded [here](#).

arranged into themes associated with the relevant questions in the consultation document. We also created a list of specific suggestions made or questions raised to which we could respond with specific answers.

What was in scope of the consultation

- 1.22 The consultation sought views on:
- the overall concept of the UKADS
 - the scope of UKADS responsibilities (whether geographically or in terms of the types or process stages of ACPs)
 - funding the UKADS and other UK airspace design changes
 - suitable governance to ensure the UKADS delivers what is needed and on time
 - a proposed two-phase approach
 - how to transition ACPs to the UKADS from the current approach for making changes to airspace design
 - modifications to the CAP 1616 airspace change process that may be needed to accommodate the activities of the UKADS
 - the proposition for the end-state UKADS in a second phase, which could eventually become solely responsible for progressing changes in UK airspace design.

What was not in scope of the consultation (what we were not consulting on)

- 1.23 The consultation also [set out](#) what we were not seeking views on (to make clear what was not in scope of the consultation):
- the CAP 1616 airspace change process, other than what modifications might be needed to support the UKADS proposals
 - specific ACPs, past or present
 - issues with specific volumes of airspace, other than examples of where the UKADS might address the issue
 - aspects of government environmental policy, including the Air Navigation Guidance (the statutory guidance given to the CAA by the Secretary of State on how it should take environmental impacts into account).
- 1.24 Consequently, the DfT and CAA have only taken into account elements of responses to this consultation that were within scope.

Chapter 2

Respondents to the consultation

Who responded to the consultation?

- 2.1 We received 151 responses, not counting one duplication.²⁸ A full list of respondents appears at the end of this chapter. You can also read individual responses, where we had respondents' permission to publish them, on our consultation website.²⁹

Responses submitted by email

- 2.2 Of the 151 responses we received, 138 were submitted using our online consultation platform, 12 were submitted 'off-line' by email, and one was sent by post. Two of these 13 off-line submissions were arranged in our question format and could therefore be included in the charts in Chapter 3 showing responses to multiple-choice questions. The other 11 off-line submissions were not arranged in our question format and so could not be included in these charts. All the points raised in free-text responses have been considered in our qualitative analysis.

Categorising respondents into stakeholder groups

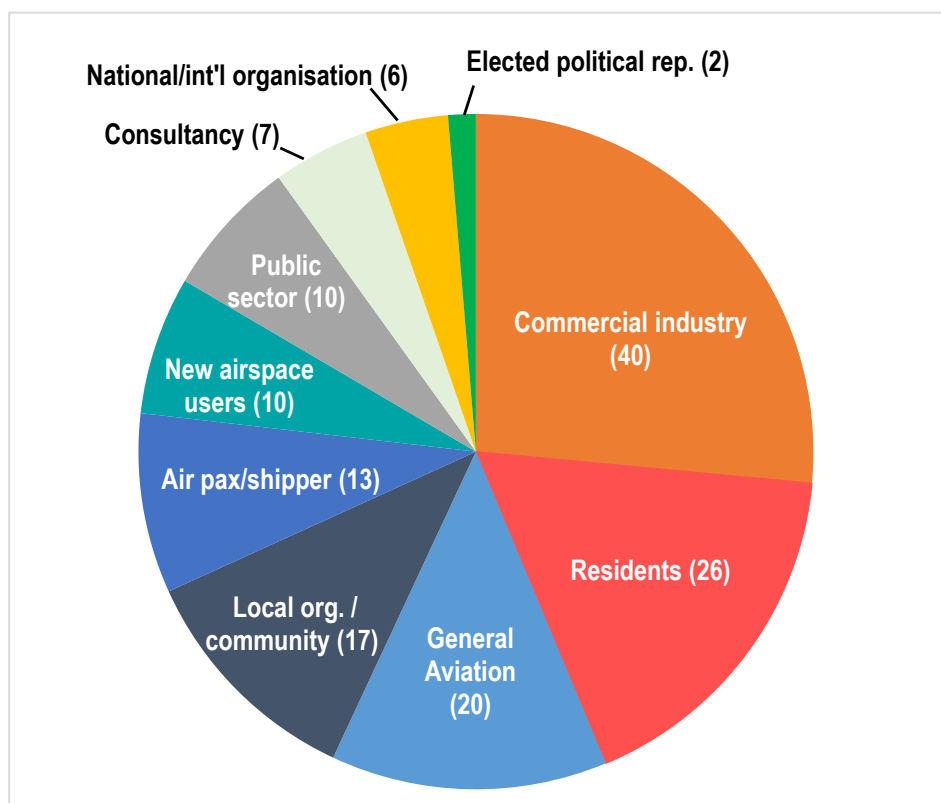
- 2.3 We asked respondents to the consultation to identify themselves as belonging to one of 10 categories:
- Air passenger, shipper or customer
 - Commercial aviation/aerospace industry including trade associations
 - Consultancy
 - General Aviation (GA), including representative organisations
 - New or developing airspace user, such as remotely piloted aircraft system, eVTOL, space industry, including representative/related organisations
 - Central or local government body, including military (we refer to this as 'public sector' in this document)
 - Local organisation such as a community action group, airport consultative committee or forum

²⁸ In this case, where someone responded twice, we merged their free text and recorded their most critical answer to the multiple-choice questions. So if the respondent chose 'minor modifications needed' in their first submission and 'major modifications needed' in their second, we recorded the answer in the second submission.

²⁹ <https://consultations.caa.co.uk/policy-development/ukads-consultation/>

- National or international organisation (excluding GA organisations and industry trade associations), for example NGO.
- Elected political representative such as councillor or Member of Parliament

Figure 2.1 Number of respondents by category



- 2.4 Of the 151 respondents, the largest category of respondents was the Commercial Aviation/Aerospace Industry (40 responses), followed by Residents Affected by Aviation (26 responses), General Aviation (20 responses) and Local Organisations or Community Action Groups (17 responses). Next largest were Air Passengers, Shippers and Customers (13 responses), New or Developing Airspace Users (10 responses) and Public Sector (10 responses). Consultancies (7 responses), National and International Organisations (6 responses) and Elected Political Representatives (2 responses) made up the remainder.

Geographic spread of responses

- 2.5 Of the 151 respondents, 92 (61%) identified themselves as resident or based in the South East (Table 2.1). The next highest category was the South West with 15 responses (10%). Eight responses (5%) came from outside the UK (including one from the Isle of Man). Each of the other nine UK categories had seven responses or fewer spread across the UK (totalling 34 or 22%). There were no responses categorised as from Northern Ireland and we were unable to categorise two responses.

Table 2.1: Responses to the consultation by geographic region

	S. East	S. West	N. West	E. of Eng.	Scotland	W. Mids.	Yorks and Humb.	E. Mids.	N. East	Wales	Out-side UK	Not answered
Air passenger/shipper	4	3	1	-	-	1	-	1	1	-	2	-
Commercial	21	3	1	3	3	1	2	1	1	-	4	-
Consultancy	4	1	1	-	-	-	1	-	-	-	-	-
Elected political rep.	1	-	1	-	-	-	-	-	-	-	-	-
General Aviation	10	3	-	2	1	2	1	1	-	-	-	-
Local organisation	15	-	1	-	1	-	-	-	-	-	-	-
National/int'l organisation	5	-	-	-	1	-	-	-	-	-	-	-
New/developing airspace user	5	3	-	-	-	-	-	-	-	-	1	1
Public sector	8	1	-	-	-	-	-	-	-	-	1	-
Resident affected by aviation	19	1	2	1	-	-	-	-	-	2	-	1
Total (151)	92	15	7	6	6	4	4	3	2	2	8	2

List of respondents by category

2.6 The list is ordered by number of responses.

Commercial aviation/aerospace industry including trade associations (40 responses)³⁰

ADS Group
Airlines For America
Airports UK
Association of International Courier and Express Services
Bristol Airport
easyJet
Edinburgh Airport
Guild of Air Traffic Control Officers
International Air Transport Association
Liverpool John Lennon Airport
London Biggin Hill Airport
London City Airport
London Heathrow Airport
London Luton Airport

³⁰ Responses from one airline and one airport selected different categories, but we have recategorised them as commercial.

London Southend Airport
Manchester Airports Group
NATS
Prospect
Regional City Airports
The Royal Aeronautical Society
TUI Group
Five airlines, five airports/airport groups and four other commercial organisations preferred to remain anonymous
Five individuals

Resident affected by aviation (26)

26 individuals

General Aviation, including representative organisations (20)

Blackbushe Airport
British Gliding Association
Farnborough Airport
General Aviation Alliance
Light Aircraft Association
PPL/IR Europe
The Aircraft Owners and Pilots Association
York Gliding Centre
Two organisations that preferred to remain anonymous
10 individuals

Local organisation such as a community action group, airport consultative committee or forum (17)

CAGNE
Council for the Independent Scrutiny of Heathrow Airport
East Twickenham Heathrow Campaign
Forest Hill Society
Gatwick Airport Consultative Committee
Gatwick Area Conservation Campaign
Heathrow Association for the Control of Aircraft Noise
HACAN East
Manchester Airport Consultative Committee
Molesey Residents Association and Elmbridge Council
Richmond Heathrow Campaign
Save Our Skies Richmond Hill
Teddington Action Group
The Dulwich Society
The Friends of Richmond Park
One organisation that preferred to remain anonymous
One individual

Air passenger, shipper or customer (13)

13 individuals

Public sector (central or local government body, including military) (10)

Heathrow Strategic Planning Group
Helions Bumpstead Parish Council
Isle of Man Civil Aviation Administration
London Borough of Lewisham
Mole Valley District Council
The Royal Parks
UKRI – Future Flight Challenge
Warnham Parish Council
Two organisations that preferred to remain anonymous

New or developing airspace user, such as remotely piloted aircraft system, eVTOL, space industry, including representative/related organisations (10)

Skynique
Vertical Aerospace
Seven organisations that preferred to remain anonymous
One individual

Consultancy (7)

Merlin Aerospace Consulting
Five consultancies that preferred to remain anonymous
One individual

National or international organisation (excluding GA organisations and industry trade associations), e.g. NGO (6)

Airspace Change Organising Group
Aviation Environment Federation
British Airline Pilots Association
British Aviation Group
Clean Air in London
ScottishPower Renewables

Elected political representative such as councillor or Member of Parliament (2)

Two Members of Parliament (joint response)
One local councillor

Chapter 3

Analysis of the responses

Overview

3.1 This chapter analyses the responses to each question, beginning with a quantitative analysis and comments on general themes and any patterns by stakeholder category. This is followed by some qualitative analysis summarising relevant points made in free-text responses.

Question 1: Overall concept

Question 1: In general terms, do you agree that a single airspace design entity in the form of a UK Airspace Design Service (UKADS) provider, properly scoped, funded and implemented, would address the challenges identified and improve delivery confidence in airspace modernisation?

Figure 3.1: Responses to question 1

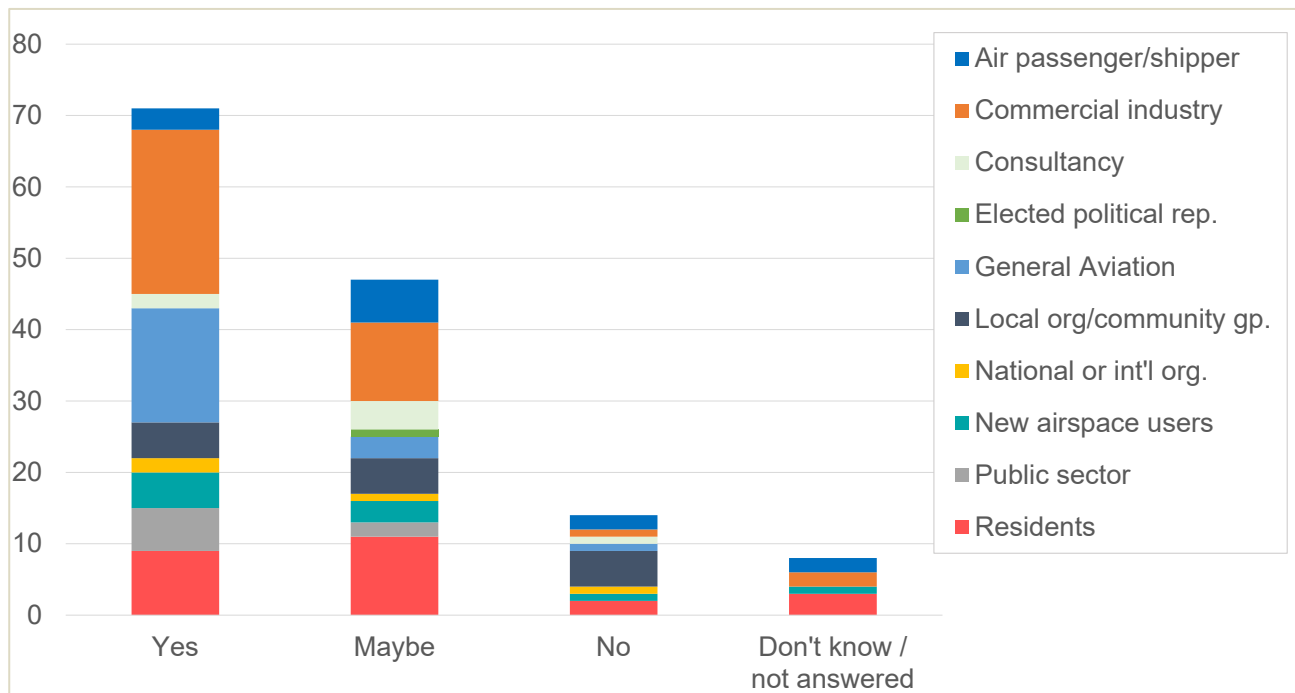


Table 3.1: Responses to question 1

Category	(a) Yes	(b) Maybe	(c) (a) + (b)	(d) No	(e) Don't know/ not answered	(f) Total	(g) Yes total	(h) (a) + (b) total
Air passenger/shipper	3	6	9	2	2	13	23%	69%
Commercial industry	23	11	34	1	2	37	62%	92%
Consultancy	2	4	6	1	0	7	29%	86%
Elected political rep.	0	1	1	0	0	1	0%	100%
General Aviation	16	3	19	1	0	20	80%	95%
Local org/community	5	5	10	5	0	15	33%	67%
National/int'l organisation	2	1	3	1	0	4	50%	75%
New airspace users	5	3	8	1	1	10	50%	80%
Public sector	6	2	8	0	0	8	75%	100%
Residents	9	11	20	2	3	25	36%	80%
Total	71	47	118	14	8	140	51%	84%

- 3.2 There was overall support for the concept of the UKADS, with 84% of respondents selecting 'Yes' (51%) or 'Maybe' (33%).
- 3.3 The Commercial Industry and GA respondents followed this pattern, as 'Yes' was selected by 62% and 80% of respondents respectively, with a minority responding 'Maybe' or 'No'. In contrast, Residents Affected by Aviation and Air Passengers selected 'Maybe' in approximately 45% of cases, with 'Yes' as a less common choice. The Consultancy and New or Developing Airspace Users categories responded similarly. Local Organisations were more divided, as answers were equally distributed among 'Yes', 'Maybe' and 'No'.
- 3.4 The free-text inputs also outlined general support for the concept. The UKADS was generally seen as a way to improve coordination, consistency of decision-making, and tackle fragmentation and interdependencies.
- 3.5 However, some respondents questioned whether the UKADS would succeed. They reference previous initiatives, such as ACOG, as examples where expectations had not always been met. A clear mandate and authority were highlighted as enablers for the UKADS to effectively address complexities and interdependencies between airspace design changes, subject to appropriate independence and governance. There were calls for greater clarity on these governance arrangements, particularly regarding the UKADS relationship with NERL. It was also suggested that there was a need for more detail on the UKADS operational concept and working arrangements with ACP partners, co-sponsors and ACOG.

Quote

“Given the complexity of UK airspace, especially around London, and international practice, there is a clear a case for a single body enabling a more integrated approach.” [response from East Twickenham Heathrow Campaign]

Quote

“[We] agree that the UK Airspace Design Service (UKADS) has the potential to simplify and improve overall confidence in the delivery of airspace modernisation. We recognise that a central design concept contributes to greater efficiency, speed of delivery and a more centralised, consistent output, ultimately increasing the probability of overcoming current issues of fragmentation. However, it is important that this change, mid-way into the progress of the FASI programme, does not increase the risk of process breach due to incompatibility with the statutory or regulatory requirements, for example CAP 1616.” [response from an airport]

Quote

“Our concern is that the price of setting a more coherent overarching national structure could potentially be loss of attention to detail and stakeholders losing their voice at local/regional level.” [response from The Royal Parks]

Quote

“The creation of UKADS, if properly scoped, would address the challenge of multiple sponsors of interdependent airspace changes. However, the accountabilities and responsibilities of UKADS must be more clearly defined.” [response from NATS]

Quote

“The benefit of a central organisation to manage ACPs cannot be overstated. This would ensure that all ACPs are processed according to national requirements and in the national interest, without local bias either for or against the proposal.” [response from an air traffic control officer]

Overall concept – outcome:

- The Government has decided to proceed with the creation of a UKADS to improve delivery confidence in airspace modernisation.

Questions 2 to 4: UKADS scope and priorities

Question 2: What are your views on our proposal that the end-state UKADS scope encompasses all ACPs in UK airspace?

Figure 3.2: Responses to question 2

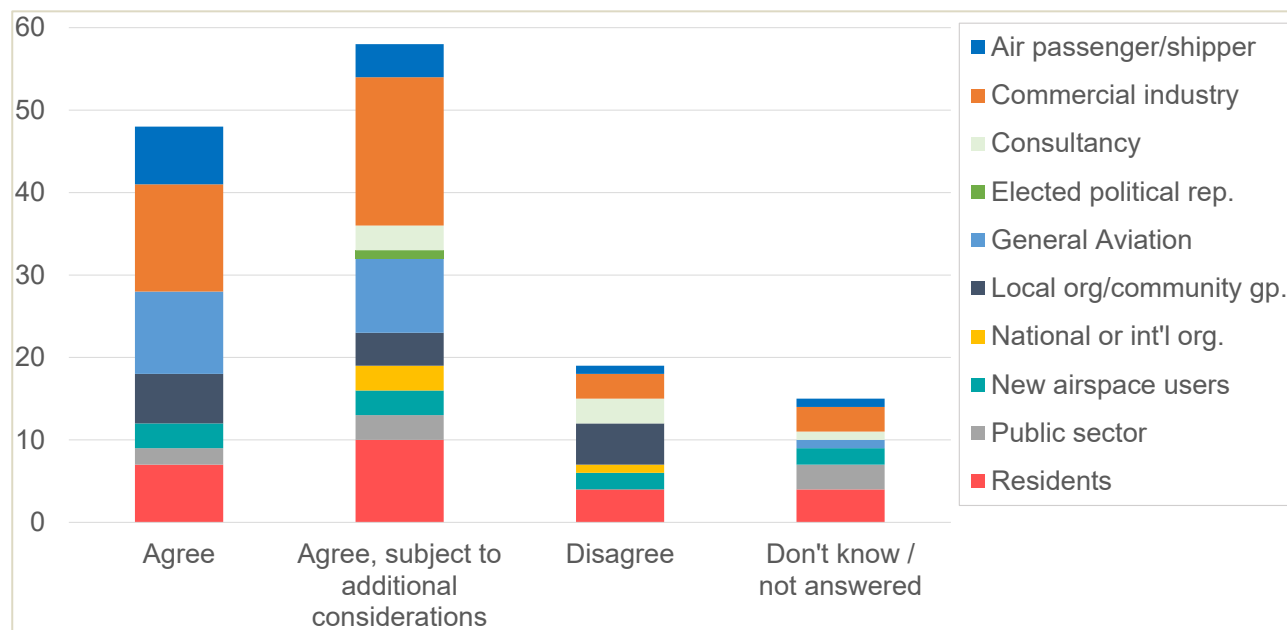


Table 3.2: Responses to question 2

Category	(a) Agree	(b) Agree, subject to additional considerations	(c) (a) + (b)	(d) Disagree	(e) Don't know/ not answered	(f) Total	(g) Agree total	(h) (a) + (b) total
Air passenger/shipper	7	4	11	1	1	13	54%	85%
Commercial industry	13	18	31	3	3	37	35%	84%
Consultancy	0	3	3	3	1	7	0%	43%
Elected political rep.	0	1	1	0	0	1	0%	100%
General Aviation	10	9	19	0	1	20	50%	95%
Local org/community	6	4	10	5	0	15	40%	67%
National/int'l organisation	0	3	3	1	0	4	0%	75%
New airspace users	3	3	6	2	2	10	30%	60%
Public sector	2	3	5	0	3	8	25%	63%
Residents	7	10	17	4	4	25	28%	68%
Total	48	58	106	19	15	140	34%	76%

3.6 Overall, the responses indicated support for the proposal that the end-state scope of the UKADS would encompass all UK ACPs, with 76% of respondents saying 'Agree' (34%) or 'Agree, subject to additional considerations' (41%).

3.7 This pattern was also visible among the Commercial Industry and Residents Affected by Aviation categories. Approximately 45% of the respondents from

each category selected 'Agree, subject to additional considerations', followed by around 30% who selected 'Agree'. 60% of New or Developing Airspace Users selected 'Agree' or 'Agree, subject to additional considerations'.

- 3.8 There was strong support from the GA and Air Passenger, Shipper or Customer categories, where nearly all selected 'Agree' or 'Agree, subject to additional considerations'. The categories with the most divided views were Local Organisations (almost equally split between 'Agree', 'Agree, subject to additional considerations', and 'Disagree') and Consultancy.
- 3.9 The free-text responses agreed that a single entity covering all ACPs would bring consistency, efficiency and a more structured approach to airspace design. It was noted that a centralised organisation could improve transparency, standardisation and overcome the inefficiencies that arise from multiple sponsors managing ACPs individually. There was an overall appreciation of the likely benefits from a UKADS for the complex London TMA region. However, it was also suggested that it may not be necessary for less complex airspace. Some responses sought greater clarity on how the UKADS would balance the needs of high-traffic areas like the London TMA against regional airports, suggesting a fully centralised approach might not always be appropriate. They highlighted the importance of accounting for local considerations in airspace design, warning that a one-size-fits-all model might overlook some local needs.
- 3.10 Some respondents also questioned whether there would be sufficiently resourced and skilled teams for the UKADS to manage all ACPs. They identified the risk of creating a single point of failure by centralising all ACPs, and the risk of the UKADS deprioritising smaller ACPs that another sponsor could progress more quickly outside of the UKADS.

Quote

"NATS agrees in principle that subject to the availability of adequate facilities, resources and tools, the scope of UKADS1 could be widened over time. NATS expects appropriate governance arrangements would ensure that requirements placed upon UKADS are reasonable and deliverable, given the industry shortage in suitably trained expertise. It's also important that UKADS is able to communicate and explain impacts and consequences to plans and overall timelines with the addition of any new scope or activity. NATS agrees that the priorities for UKADS should be aligned with the UK AMS and that the DfT and CAA should set these priorities in consultation with UKADS. NATS expects these priorities to focus on those ACPs (or clusters thereof) where the intervention of UKADS would be most likely to bring wider user benefits than might be achieved through a single commercial sponsor of an ACP." [response from NATS]

Quote

“In the longer term, we agree that UKADS in its end-state should be responsible for all UK ACPs as long as it does not prejudice the short-term priority of delivering airspace change in the London TMA region.” [response from Heathrow Airport]

Quote

“An appropriately resourced UK Airspace Design Service (UKADS) with responsibility for all airspace change in the UK has the potential to deliver a more systematic, controllable and consistent mechanism for the delivery of airspace change. [response from an airport]

Quote

“UK ADS is appropriate for large, complicated, multi-sponsor ACPs , such as FASI, but not appropriate for the majority of small single sponsor ACPs.” [response from London Biggin Hill Airport]

Quote

“The skills and knowledge needed for the airspace designers for any ACPs associated with enabling new airspace users will likely be different to the airport based changes and therefore ensuring that UKADS1 has the right skills and knowledge to take on such changes will be necessary as part of the planning for the medium term. [...] There is the potential for creating a significant bottleneck for any changes and a risk of serious delay for anything not deemed as high priority. There is already an issue with CAA capacity at times and having a monopoly for the ACP sponsorship may only compound this.” [response from UKRI – Future Flight Challenge]

Quote

“Disagree. Local circumstances are paramount. A national body would not be able to manage that without local knowledge.” [response from a resident affected by aviation]

Question 3: What are your views on our proposal that the short-term UKADS scope should be the London TMA region?

Figure 3.3: Responses to question 3

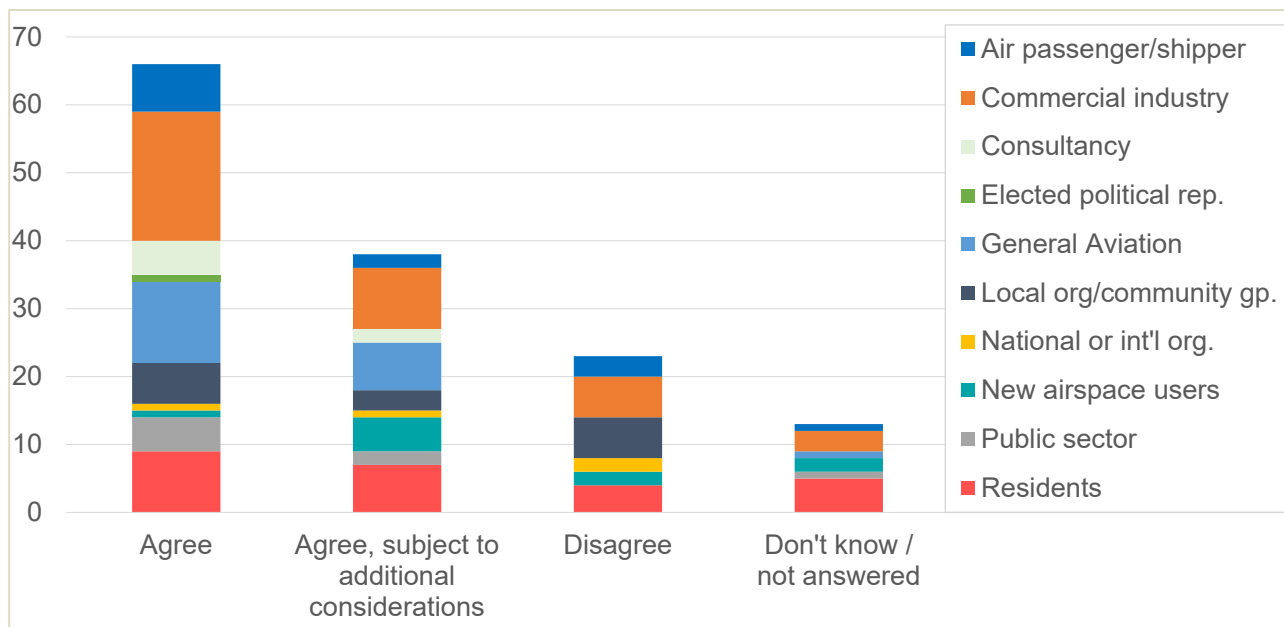


Table 3.3: Responses to question 3

	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
Category	Agree	Agree, subject to additional considerations	(a) + (b)	Disagree	Don't know/ not answered	Total	Agree total	(a) + (b) total
Air passenger/shipper	7	2	9	3	1	13	54%	69%
Commercial industry	19	9	28	6	3	37	51%	76%
Consultancy	5	2	7	0	0	7	71%	100%
Elected political rep.	1	0	1	0	0	1	100%	100%
General Aviation	12	7	19	0	1	20	60%	95%
Local org/community	6	3	9	6	0	15	40%	60%
National/int'l organisation	1	1	2	2	0	4	25%	50%
New airspace users	1	5	6	2	2	10	10%	60%
Public sector	5	2	7	0	1	8	63%	88%
Residents	9	7	16	4	5	25	36%	64%
Total	66	38	104	23	13	140	47%	74%

3.11 There was overall support for the proposal that the London TMA region should be the short-term scope of the UKADS. 74% of respondents opted for 'Agree' (47%) or 'Agree, subject to additional considerations' (27%).

3.12 The overall pattern was closely followed by the GA, Commercial Industry and Air Passenger, Shipper or Customer categories, where 'Agree' was selected by the majority of respondents, followed by 'Agree, subject to additional considerations'.

There was a similar pattern among the Consultancy and Public Sector categories. In contrast, half of the New or Developing Airspace Users responses selected 'Agree, subject to additional considerations', followed by 'Disagree' and 'Don't know', or no answer, each accounting for 20% of answers.

- 3.13 Free-text responses agreed that prioritising the London TMA region in the short term was a logical and necessary approach. The London TMA was widely acknowledged as the most complex region for airspace change with interdependencies that make coordinated designs essential. Respondents also noted that focusing on this airspace could deliver significant modernisation benefits in the short to medium term, supporting both commercial aviation and other airspace users. Some responses stated that starting with the London TMA would provide a foundation for the UKADS, before expanding its scope nationwide.
- 3.14 On the other hand, other responses suggested that UKADS should start with simpler airspace such as the Manchester or Scotland clusters to develop initial expertise before tackling the more complex airspace. Some respondents expressed concern that beginning with the London TMA could delay modernisation in other parts of the UK, warning that a singular focus on the south-east might create a bottleneck effect, where resources, funding and expertise are allocated at the expense of other regions. Respondents called for strategies to ensure that modernisation efforts are balanced across the UK.

Quote

“As the consultation document sets out, the London TMA region has the most complex airspace change challenges, with multiple interdependencies and significantly growing demand. It is the region where UKADS can give the UK the most significant benefit, and where the UKADS concept can be best developed and proven. Delivering UKADS in the London TMA region will give a high level of assurance that the model can be rolled out elsewhere.” [response from Heathrow Airport]

Quote

“How do you deal with that airspace that links the TMA, because you [are] talking about arrivals and departures? Also around the London TMA there are 11 GA aerodromes and there is also the London Heliroute --- plus rotary operations over the City and you also have London City Airport with climb out traffic that needs coordination with LHR arrivals – it's a busy area and all airspace users may be affected. Therefore a NERL/ UKADS will need to look beyond airline operations.” [response from The Aircraft Owners and Pilots Association (AOPA)]

Quote

“Modernising airspace within the London TMA is a justified short-term priority due to its complexity and interdependencies among airports. Concurrently, opportunities exist to maintain progress in other regions, specifically the Manchester and Scottish TMAs, especially if a robust central funding model is in place.” [response from a consultancy]

Quote

“It is essential that other areas are also able to progress without undue delay. The Manchester Airport FASI has made good progress through the gateways but has already experienced delays of around six months. There has been work with Liverpool Airport which has resulted in an agreed way forward and the Manchester TMA should be approved for progression as soon as possible.” [response from Manchester Airport Consultative Committee]

Quote

“Why start with the most complex airspace to prove a concept? It should grow in experience and stature through smaller scale change in the regions in the 1st instance. UKADS is at significant risk of being bogged down in the LTMA for 10+ years leaving the rest of the country to sit in limbo. Not really in the spirit of levelling up.” [response from an airport]

Quote

“If the LTMA were to be prioritised, the increase in investment in the aviation industry would also provide second and third order effect to enable new connecting routes throughout the country as economic growth offers opportunity for all.” [response from London Luton Airport Operations]

Question 4: What are your views on our proposals for the UKADS scope in the medium term? Our proposed medium-term scope includes other ACPs deemed a priority, such as masterplan clusters at risk, changes mandated by law, and specific state-wide changes supporting the Airspace Modernisation Strategy.

Figure 3.4: Responses to question 4

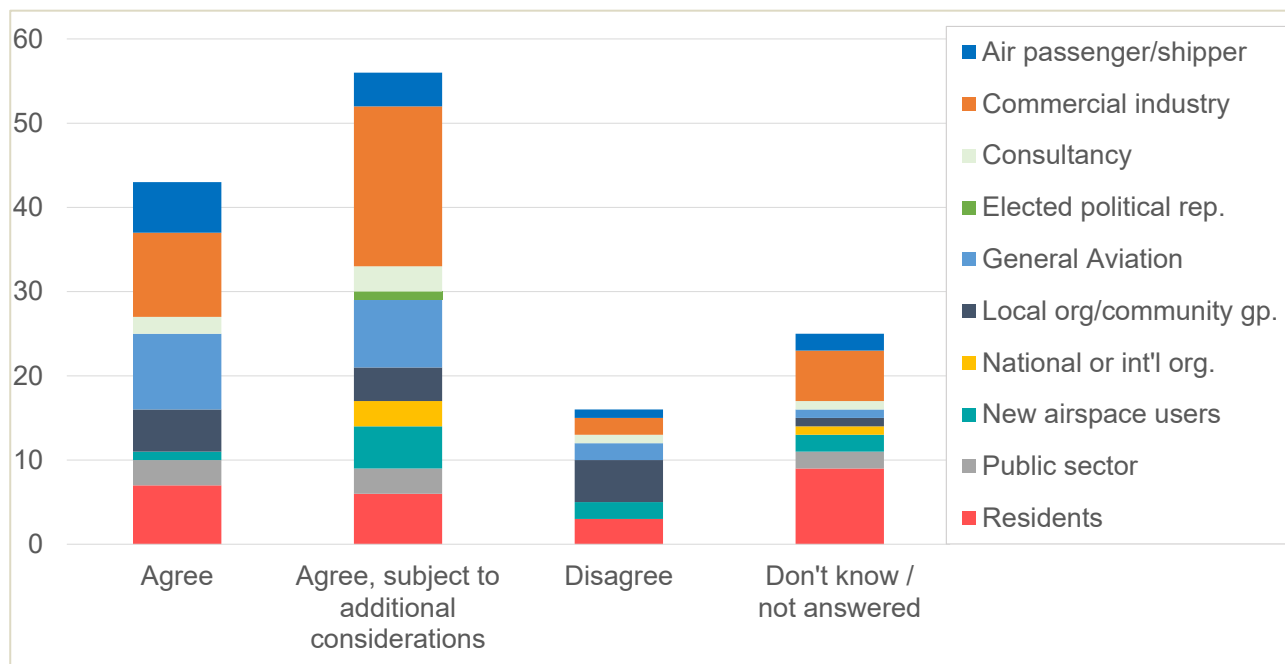


Table 3.4: Responses to question 4

Category	(a) Agree	(b) Agree, subject to additional considerations	(c) (a) + (b)	(d) Disagree	(e) Don't know/ not answered	(f) Total	(g) Agree total	(h) (a) + (b) total
Air passenger/shipper	6	4	10	1	2	13	46%	77%
Commercial industry	10	19	29	2	6	37	27%	78%
Consultancy	2	3	5	1	1	7	29%	71%
Elected political rep.	0	1	1	0	0	1	0%	100%
General Aviation	9	8	17	2	1	20	45%	85%
Local org/community	5	4	9	5	1	15	33%	60%
National/int'l organisation	0	3	3	0	1	4	0%	75%
New airspace users	1	5	6	2	2	10	10%	60%
Public sector	3	3	6	0	2	8	38%	75%
Residents	7	6	13	3	9	25	28%	52%
Total	43	56	99	16	25	140	31%	71%

3.15 Overall, responses indicated agreement with the proposed medium-term scope of the UKADS, although with more reservations than for the short-term proposal. 71% of respondents expressed agreement with the proposal or agreement subject to additional considerations.

- 3.16 Commercial Industry respondents closely followed the overall pattern; about a third selected 'Agree' and about half selected 'Agree, subject to additional considerations'. Respondents in the New or Developing Airspace Users and Consultancy categories reflected a similar pattern.
- 3.17 The Air Passengers, Shippers or Customers and GA categories overwhelmingly agreed with the proposal, as responses were almost evenly split between 'Agree' and 'Agree, subject to additional considerations'. Local Organisations were almost equally split between 'Agree', 'Agree, subject to additional considerations' and 'Disagree'. Around one third of Residents Affected by Aviation selected 'Don't know' or chose not to answer the question, and around one half chose 'Agree' or 'Agree, subject to additional considerations'.
- 3.18 The free-text responses elaborated on the general support for the proposal and stated that an iterative approach to UKADS expansion would be logical, structured and beneficial for modernising airspace. Some noted that a gradual transition from the initial London TMA focus to a wider scope would allow lessons from early implementation to inform future improvements. Respondents recognised that this approach is consistent with the AMS delivery plan and objectives. The importance of having adequate resource to support growing UKADS responsibilities in the medium-term and effectively service multiple airspace regions was again highlighted.
- 3.19 Some respondents also stated that the ACP prioritisation rationale and medium-term timescales seemed ambiguous, and sought more definitive criteria for when the scope would expand. Multiple respondents highlighted the need for transparent and objective criteria to determine which ACPs would be prioritised in the medium term. Respondents argued that allowing certain ACPs to be deemed a priority left room for subjective decision-making and potential bias. Some respondents questioned whether the commercial interests of NERL could unduly influence prioritisation without clear governance safeguards in place.

Quote

"While the London TMA and other high-traffic clusters are critical, the medium-term scope should also address the needs of less congested regions. These areas, often serving low-cost carriers, require modernization to unlock capacity and support optimized flight paths." [response from an airline]

Quote

"...this is likely to be a steep learning curve and therefore there should be a different set of criteria to choose the first airspace. Then the learning can be taken forward to the next. Something this complex will need a diversity of thought and the ability to learn from mistakes." [response from a resident affected by aviation]

Quote

“...in principle, we think the progressive increase in the scope of UKADS is reasonable. [...] those ACPs in clusters outside of the London Terminal Manoeuvring Area (TMA) region are making progress and should be supported and allowed the freedom to complete their work, with UKADS only intervening where there is a material risk to delivery – if at all.” [response from Manchester Airports Group]

Quote

“More detail on the governance and process around moving into the medium-term would assist, including on who makes the decision to expand the scope of UKADS and requirements to consult before doing so. Current ACP Sponsors should at least be fully consulted before other ACPs are brought under UKADS’ scope. There should be a clear statement around prioritisation of the London TMA region pending the move to UKADS1 medium-term.” [response from Heathrow Airport]

Quote

“UKADS1 fundamentally is the start of the proportionate centralised approach that provides efficient deliverance of airspace changes that meets the government’s strategic goals but also UK commercial entities. We would urge government to recognise that whilst various aspects of the AMS incorporates new airspace users that provide economic and socio-economic benefits, this does not come without risk to a UKADS that fully adopts all ACPs in the UK. Whilst these industries are heavily invested in by large commercial entities, they will want to see a monetary return for investment at pace, therefore, risking an influx of Statements of Need to the CAA and demands on regulatory resource. This should be mitigated by strategic initiatives within the CAA and DfT to resource accordingly to handle large volumes of CAP1616 gateway casework.” [response from London Luton Airport Operations]

Quote

“The UKADS consultation correctly identifies an airspace design skills shortage in the UK. The initial scope of UKADS1, to deliver the London TMA region, is by far the biggest airspace change ever undertaken in terms of complexity, scope, and number of stakeholders. It is unlikely that full delivery of the London cluster will be before the mid-2030s; therefore, NATS would caution against significant expansion of the UKADS1 remit in the short to medium term without a clear understanding of impacts and consequences to programme timelines as it is unlikely there will be sufficient resource and skills available to deliver a significantly expanded remit in parallel.” [response from NATS]

UKADS scope and priorities – outcome:

- The ultimate scope of the UKADS is that it becomes responsible for progressing all ACPs in UK airspace. In the short term, subject to the licence modification process, the scope of the UKADS will be the London TMA region, with the airports forming the London cluster of the airspace change masterplan as a priority.
- The UKADS consultation took place before the Government's 29 January 2025 [announcement](#) supporting a possible third runway at Heathrow. Any plans and timetable for a third runway may influence the UKADS short-term scope, because a third runway will likely require redesigned airspace and therefore may require the UKADS to sponsor an airspace change proposal. While this further strengthens the case for prioritising the London TMA region, it could disrupt current timescales and, maybe, when the UKADS could take on the London cluster ACPs. The DfT and CAA will continue to keep this under review, retaining the flexibility to amend the short-term scope for UKADS if needed. (For the avoidance of doubt, Gatwick has confirmed that no new ACP is required as a result of any decision on its northern runway.)
- We expect the UKADS to build its capability over time and for its scope to be broadened (whether geographically or in terms of the types of ACP) to other ACPs deemed a priority. This could be any other masterplan clusters, airspace changes mandated by law, specific state-wide changes supporting the AMS unlikely to be progressed on their own (such as aligning UK Flight Information Services with ICAO and further developing beyond-visual-line-of-sight drone operations or eVTOL, to the extent that ACPs are needed), as well as other airspace changes that would facilitate priority government policy objectives, for example safety and national security proposals.

Questions 5 and 6: Two-phase approach

Question 5: Do you have any views on our proposed two-phase approach?

Figure 3.5: Responses to question 5

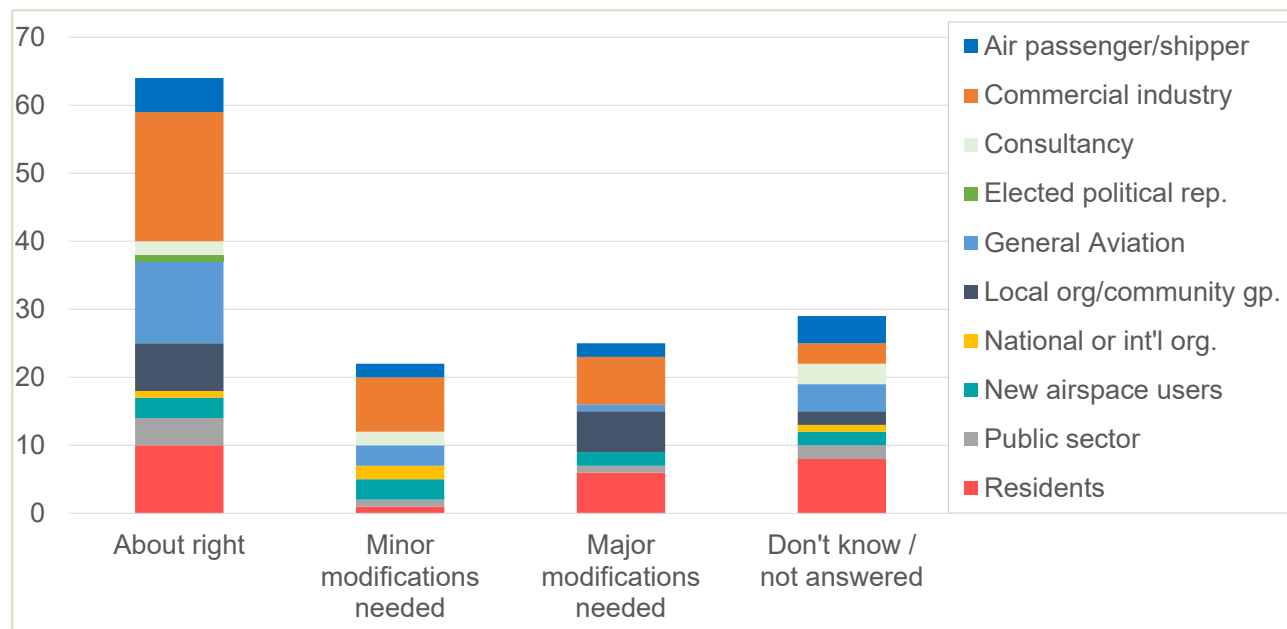


Table 3.5: Responses to question 5

	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
Category	About right	Minor mod's needed	(a) + (b)	Major mod's needed	Don't know/ not answered	Total	(a) total	(a) + (b) total
Air passenger/shipper	5	2	7	2	4	13	38%	54%
Commercial industry	19	8	27	7	3	37	51%	73%
Consultancy	2	2	4	0	3	7	29%	57%
Elected political rep.	1	0	1	0	0	1	100%	100%
General Aviation	12	3	15	1	4	20	60%	75%
Local org/community	7	0	7	6	2	15	47%	47%
National/int'l organisation	1	2	3	0	1	4	25%	75%
New airspace users	3	3	6	2	2	10	30%	60%
Public sector	4	1	5	1	2	8	50%	63%
Residents	10	1	11	6	8	25	40%	44%
Total	64	22	86	25	29	140	46%	61%

- 3.20 The responses revealed overall support for the two-phase approach; 61% of respondents selected 'About right' (46%) or 'Minor modifications needed' (16%).
- 3.21 The Commercial Industry category closely matched the overall pattern, as the 'About right' option was chosen by most respondents, followed by 'Minor modifications needed'. A smaller proportion selected 'Major modifications needed' and 'Don't know' or did not answer. The Public Sector and GA

stakeholder categories were similar, with the majority selecting 'About right', followed by 'Don't know' or not providing an answer.

- 3.22 Despite many positive responses, more uncertainty about the proposal came from the Air Passenger, Shipper or Customers and Residents Affected by Aviation categories, where responses were approximately equally split between 'About right' and 'Don't know' or not answered, followed by major and minor modifications needed.
- 3.23 New or Developing Airspace User responses were approximately equally split between 'About right' and 'Minor modifications needed'. Local Organisation responses were divided between 'About right' and 'Major modifications needed'.
- 3.24 In the free-text responses many agreed that a phased implementation was a logical approach to effective delivery. It was noted that structuring the UKADS into two phases would allow for a measured rollout and enable lessons from the initial phase to inform future improvements. Respondents highlighted the importance of a carefully managed transition.
- 3.25 Some respondents suggested that varying approaches of different entities handling each phase could introduce delays, and suggested that mechanisms were needed to maintain momentum. Some thought that the timescales for the first phase were ambitious, particularly given current resource limitations and the reliance on support from the airspace design industry. Some emphasised that flexibility was key and agreed that the second phase should be adapted based on the achievements of the first phase. There were calls for greater clarity on the regulatory and legal aspects.

Quote

"This is considered to be an appropriate approach. Assurance is needed, however, that complex and lengthy changes to outputs from UKADS1 would not be needed at the UKADS2 stage, and essentially repeat stages to ensure UK airspace works as a whole. It is noted that the responsibility for carrying out the work is different between the two phases. It is not unusual that where there is such a change delays are frequently incurred due to the different approaches of each party. Mechanisms must be in place to prevent abortive work at the UKADS1 stage and ensure progress and momentum through to the end of UKADS2. [Response from Mole Valley District Council]

Quote

"[We] strongly support a two-phase implementation approach for this proposal. If momentum in the FAS| programme is to be maintained this is the approach that is most likely to enable timely and effective delivery of this initiative. [Response from an airport]

Quote

“The option you have selected appears to be the most pragmatic and implementable in a short time-scale. It might be possible to address the Scottish TMA, or another region, as a first test-case and that the lessons learned could be applied to the more complex London TMA region. However, progress on the second phase will be dependent on the results of the consultation, achievements under UKADS1 and the relevant changes as signposted in Q4. The co-sponsors may have to remain flexible and adjust their ambition for the second phase according to the progress made. The timescale to stand-up UKADS1 in 2025 is considered to be ambitious having regard for the scale of other changes required to deliver a successful outcome and partly due to the fact that NERL do not have the necessary resources. Much will also depend on the cooperation and willingness of airspace design players, including APDOs to act as subcontractors to UKADS1” [response from The Royal Aeronautical Society]

Quote

“ADS is supportive of a two-phase approach that would see the initial operating model trialled before a wholesale roll-out across the UK. It is clear that a generational reform of this nature should be undertaken gradually, so that lessons may be learned from phase one and applied in later phases. With that said, the timescales for phase two should be more clearly defined as there is significant ambiguity around the pace at which reform will advance once phase one has been completed. If the progression of UKADS2 is contingent on the success of UKADS1 in meeting its objectives, those objectives should be clearly defined and quantifiable at an early stage so that industry has certainty on which ACP regime it is likely to be operating in for the medium term. Similarly, to reiterate points already made, flexibility should be built into the outputs of UKADS1 so that it may accommodate the introduction of new technologies and the next generation of aircraft.” [response from ADS Group]

Quote

“You need to see it performing well; the South East airspace is complex with many stakeholders and lessons from that work should streamline future work. [Response from an air passenger, shipper or customer]

Question 6: Do you have any views on the models that have been considered?

Figure 3.6: Responses to question 6

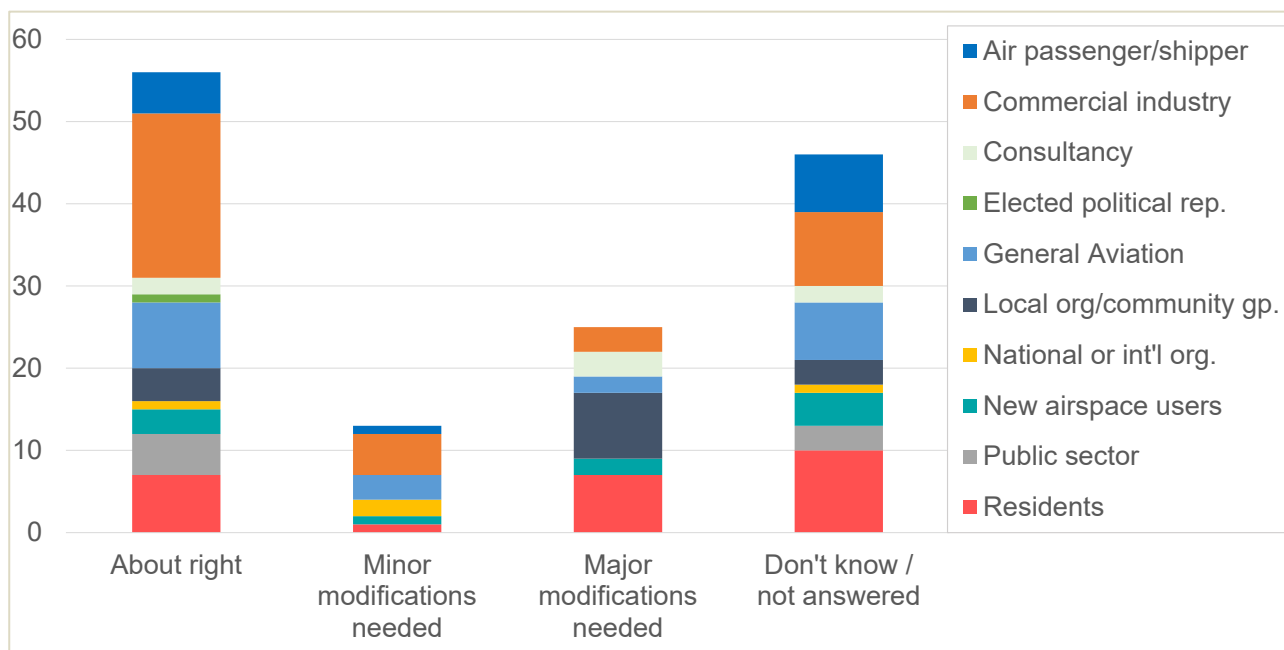


Table 3.6: Responses to question 6

	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
Category	About right	Minor mod's needed	(a) + (b)	Major mod's needed	Don't know/ not answered	Total	(a) total	(a) + (b) total
Air passenger/shipper	5	1	6	0	7	13	38%	46%
Commercial industry	20	5	25	3	9	37	54%	68%
Consultancy	2	0	2	3	2	7	29%	29%
Elected political rep.	1	0	1	0	0	1	100%	100%
General Aviation	8	3	11	2	7	20	40%	55%
Local org/community	4	0	4	8	3	15	27%	27%
National/int'l organisation	1	2	3	0	1	4	25%	75%
New airspace users	3	1	4	2	4	10	30%	40%
Public sector	5	0	5	0	3	8	63%	63%
Residents	7	1	8	7	10	25	28%	32%
Total	56	13	69	25	46	140	40%	49%

3.26 Overall, respondents expressed support for the proposed model. Approximately half selected 'About right' or 'Minor modifications needed', and nearly a third indicated uncertainty by selecting 'Don't know' or not answering. The Commercial Industry and Public Sector responses aligned with this overall pattern.

3.27 Other respondent categories expressed more divided opinions, being split fairly evenly between 'About right' and 'Don't know' or no answer for GA, Air Passenger, Shipper or Customer and New or Developing Airspace Users.

Consultancies were split between 'About right', 'Major modifications needed' and 'Don't know'. Local Organisations mostly selected 'Major modifications needed', followed by 'About right' and 'Don't know' or did not answer the question. Residents Affected by Aviation expressed a less certain view as 40% of respondents indicated 'Don't know' or skipped the question.

- 3.28 The free-text responses generally acknowledged that the models under consideration covered key options and overall agreed with the rationale for separation from regulatory functions to avoid conflicts of interest and maintain stakeholder confidence. There was also recognition of the legislative or practical constraints involved with the models that had been discounted.
- 3.29 Some responses criticised the high-level nature of the proposed models, specifically with regards to aspects that might have been overlooked. Some respondents suggested that strengthening existing bodies like ACOG or creating a fully independent public entity were worthy of further reflection. Respondents highlighted the importance of ensuring that any new body has clear oversight mechanisms, particularly if it holds a monopoly on airspace design services. Some concerns were expressed around the suitability of NERL for the role citing potential bias and conflicts of interest.

Quote

"We agree with the CAA's proposed approach. The rejection of models that rely on the CAA directly carrying out the UKADS function is appropriate to avoid conflicts of interest and maintain stakeholder confidence." [response from Vertical Aerospace]

Quote

"It is important that the UKADS serve as a separate entity to the CAA to ensure that ACPs are considered without prejudice. The success of an ACP assessment is dependent upon a fair and objective gate check process. Any proposal allowing the CAA to be in control of the UKADS, either directly or via third party control, would call this into question." [response from Scottish Power Renewables]

Quote

"Firstly, it needs to be better understood why ACOG is viewed as no longer being capable of fulfilling the role it was set up to do in 2019. Could a beefed up ACOG do the job?" [response from Molesey Residents Association and Elmbridge Council]

Quote

“The consultation gives high level detail of the other models explored and a rationale that seems sensible for why each of these options were rejected. However, having not been party to any detailed discussions on these, it is difficult to say with any certainty whether there is further considerations for any of the other models or whether any other solutions should have been considered. For example, should the remit of ACOG been adapted to enable them to have design decisions by creating a design team with authority?”
[response from UKRI – Future Flight Challenge]

Two-phase approach – outcome:

- To accommodate the need to broaden the scope of the UKADS over time, we will proceed with an iterative approach. In the first phase we will require NERL to establish the UKADS as soon as possible to provide airspace design services. Subject to the caveat about Heathrow above, the UKADS will initially prioritise the complex London TMA region. Over time, we expect that the UKADS will build its capability and that its scope will be broadened (in terms of geography and type of ACP) beyond the London TMA region.
- In parallel, but necessarily on a longer timeframe, we will consider developing detailed proposals for an extended-scope UKADS that could have responsibility for sponsoring all airspace change in the UK. This would be subject to the DfT and CAA reviewing:
 - the success of the UKADS in meeting its objectives in the first phase, and
 - what changes would address any unfulfilled objectives.
- Primary legislation would likely be required to facilitate this, and we will consider seeking such powers. No decisions have been made on the detailed form yet, including whether it would be a new or existing body, and that detail would be subject to further consultation in the future.

Questions 7 to 9: Initial operating model, UKADS within NERL

Question 7: Do you have any views on our proposal that NERL takes on the initial task of providing airspace design services through UKADS1?

Figure 3.7: Responses to question 7

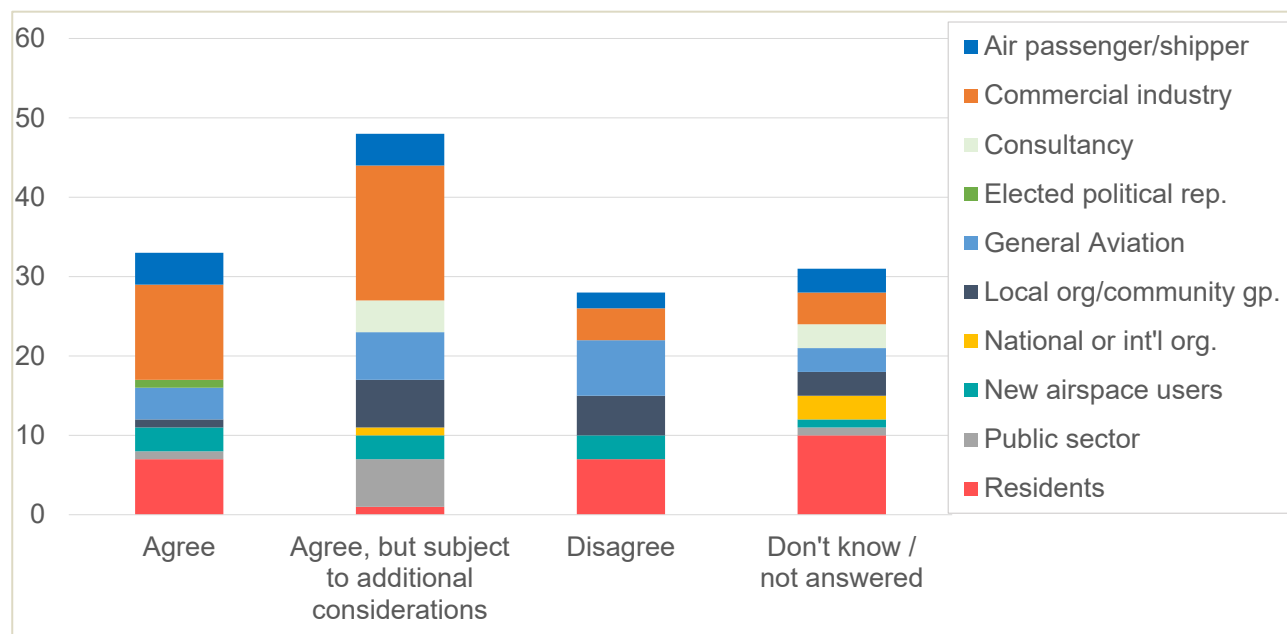


Table 3.7 Responses to question 7

Category	(a) Agree	(b) Agree, subject to additional considerations	(c) (a) + (b)	(d) Disagree	(e) Don't know/ not answered	(f) total	(g) Agree total	(h) (a) + (b) total
Air passenger/shipper	4	4	8	2	3	13	31%	62%
Commercial industry	12	17	29	4	4	37	32%	78%
Consultancy	0	4	4	0	3	7	0%	57%
Elected political rep.	1	0	1	0	0	1	100%	100%
General Aviation	4	6	10	7	3	20	20%	50%
Local org/community	1	6	7	5	3	15	7%	47%
National/int'l organisation	0	1	1	0	3	4	0%	25%
New airspace users	3	3	6	3	1	10	30%	60%
Public sector	1	6	7	0	1	8	13%	88%
Residents	7	1	8	7	10	25	28%	32%
Total	33	48	81	28	31	140	24%	58%

3.30 Overall, responses outlined cautious support towards NERL taking on the provision of UKADS in its first phase. 58% of respondents collectively expressed agreement with the proposal, but with the majority of those (34% of the total) conditioning their agreement as subject to additional considerations. 22% of

respondents selected 'Don't know' or did not answer, and approximately the same proportion chose 'Disagree'.

- 3.31 This overall pattern was reflected in the answers of Commercial Industry stakeholders, as agreement was expressed by 78% of respondents, with 'Agree, subject to additional considerations' being the most common answer. Similarly, 88% of Public Sector respondents agreed with the proposal, although most did so subject to additional considerations. The Air Passenger, Shipper or Customer category was broadly supportive of the proposal, with 62% of respondents expressing support. In contrast, while 50% of GA stakeholders overall supported the proposal, 35% disagreed.
- 3.32 Some stakeholder categories did not reveal a clear opinion. Among the Residents Affected by Aviation, 40% selected 'Don't know' or skipped the question, and 32% either selected 'Agree' or 'Agree, subject to additional considerations' while 28% disagreed. National / International Organisations also mainly selected 'Don't know' or skipped the question.
- 3.33 Free-text responses showed that many respondents recognised NERL's experience and expertise as key factors in its suitability to provide the UKADS. While agreeing in principle that it was the best suited organisation, some concerns were raised around the potential for a lack of transparency and the need for impartiality. Respondents highlighted potential conflicts of interest related to NERL's structural setup, suggesting also that the proposal would give NATS a monopoly in airspace design. Many noted the importance of adequate governance mechanisms to make UKADS fully accountable.
- 3.34 Some respondents also questioned NERL's capacity to manage this additional responsibility alongside its existing commitments, highlighting potential operational challenges, specifically around resource constraints and the risk of NERL monopolising expertise. Some respondents also suggested that NERL has a track record of under-delivery on key programmes.

Quote

"BAG believes there is a danger in creating a presumption that NATS can be pressured into agreeing to a sub-optimal undertaking – or indeed that the CAA can simply change NATS' licence and require it to take this work on. We need to guard against setting the process up to fail. It is understood by many in the aviation industry that the current proposal does not provide a framework for success in several key areas. This runs the risk of NATS being unwilling to take on the responsibility for UKADS1 based on the current proposal."
[response from British Aviation Group]

Quote

“The proposal to task NERL with the initial UKADS1 function appears a strategic move to leverage their expertise and capabilities. However, it is crucial to address potential concerns and mitigate risks to ensure the success of this approach. Some key considerations are:

1. Impartiality: NATS’s commercial interests could potentially influence their decisions, and therefore a robust governance mechanism is required, such as an independent advisory board to allay any concerns.
2. Coordination and Collaboration: Will NERL be able to coordinate UKADS1 and other stakeholders, especially if there has been conflict in the past between these organisations?
3. Resource Allocation: NERL must demonstrate that they have the required resources to deliver UKADS1, thus ensuring its success. This may include staffing levels, expertise and project management.
4. Skill Development: NERL must demonstrate a committed investment in developing the skills of the workforce to develop this project, including airspace designers, technical experts and project managers.
5. Transparency and Accountability: These are the two key drivers that will ensure that UKADS is successful and NERL must demonstrate how this will be achieved.” [response from a consultancy]

Quote

“With all due respect to NATS, there are commercial concerns that come into play in relation to airports where NATS used to be the ANSP. I don't for one minute believe that NATS would intentionally prioritise their own contracts but there does need to be some level of transparency to protect the DfT, CAA and NATS as there is no doubt too much resource will be spent evidencing transparency than actually doing the work that is needed. There is also concern that NATS have a specific way of airspace design which is very UK centric. While this may work in some instances, the move to an ICAO airspace structure should involve organisations/people with international airspace design experience.” [response from a consultancy]

Quote

“Is there a conflict of interest with NERL being the ANSP and the airspace designer? In situations like this, it is normally better to have an independent pair of eyes look at the current airspace and the possible solutions without being biased by your own business priorities.” [response from Guild of Air Traffic Control Officers]

Quote

“Impartiality through NERL’s licence must be enforced through strict Governance, taking the views of airports and other stakeholders that are consulted or engaged with.” [response from an airline]

Quote

“...there is already a constraint on NERL as an organization in deploying changes and this may present a potential bottleneck for some systematic and/or modernisation elements.” [response from UKRI – Future Flight Challenge]

Quote

“Whilst it is inevitable that ‘trade-off’ decisions will be needed, it is critical that decisions are taken transparently and impartially. UKADS will only be able to perform its duties effectively if it maintains the confidence of partners and other stakeholders.” [response from Manchester Airports Group]

Question 8: Do you consider that in progressing a particular cluster of the masterplan, UKADS1 should take over ACOG’s current coordination or masterplanning role for that cluster?

Figure 3.8: Responses to question 8

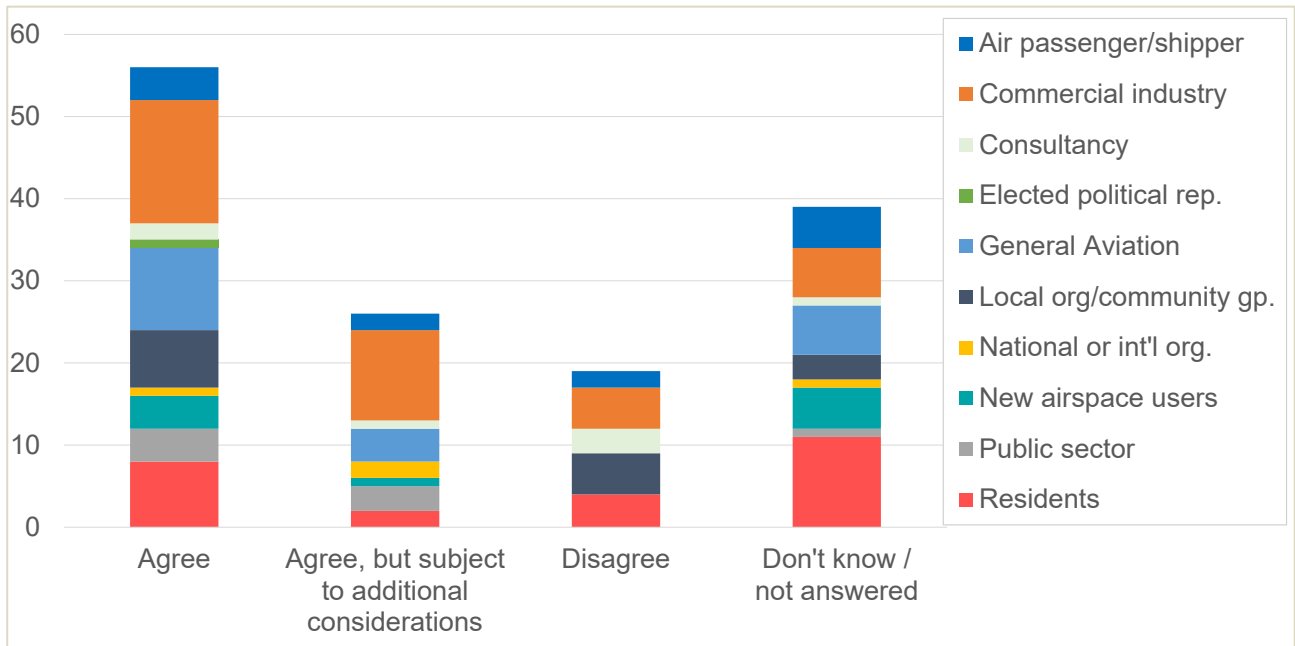


Table 3.8: Responses to question 8

Category	(a) Agree	(b) Agree, subject to additional considerations	(c) (a) + (b)	(d) Disagree	(e) Don't know/ not answered	(f) Total	(g) Agree total	(h) (a) + (b) total
Air passenger/shipper	4	2	6	2	5	13	31%	46%
Commercial industry	15	11	26	5	6	37	41%	70%
Consultancy	2	1	3	3	1	7	29%	43%
Elected political rep.	1	0	1	0	0	1	100%	100%
General Aviation	10	4	14	0	6	20	50%	70%
Local org/community	7	0	7	5	3	15	47%	47%
National/int'l organisation	1	2	3	0	1	4	25%	75%
New airspace users	4	1	5	0	5	10	40%	50%
Public sector	4	3	7	0	1	8	50%	88%
Residents	8	2	10	4	11	25	32%	40%
Total	56	26	82	19	39	140	40%	59%

- 3.35 Overall, stakeholders were supportive of the UKADS taking over ACOG's current coordination activities for ACPs in scope. 59% of respondents selected 'Agree' (40%) or 'Agree, but subject to additional considerations' (18%).
- 3.36 70% of Commercial Industry respondents selected one of those two answers, of which 41% stated firm agreement. The GA category agreed with the proposal in 70% of responses, with no outright disagreement. Public Sector responses followed a similar pattern. The Air Passenger, Shipper or Customer category expressed agreement or conditional agreement in 46% of their responses, while 'Don't know' or no answer was provided in 38% of cases. Similarly, 40% of Residents Affected by Aviation expressed agreement or conditional agreement with the proposal and 44% said 'Don't know' or did not answer. New or Developing Airspace User responses were split nearly equally between 'Agree' and 'Don't know' or not answering. Local Organisations were also divided, as 46% selected 'Agree', while 33% selected 'Disagree'.
- 3.37 Free-text responses expressed support for a transition of roles from ACOG to the UKADS, justifying it as part of the approach to a holistic approach to airspace design. Some respondents suggested that the initial ambitions for ACOG had not been realised and its role would be superseded when the UKADS is established with greater powers and responsibilities. The importance of knowledge transfer was highlighted as well as the need for clear separation between the UKADS and continuing ACOG coordination of the non-London clusters, which would avoid overburdening the UKADS during its initial phase.
- 3.38 Some respondents were concerned about the risk of disrupting current ACPs and loss of momentum in modernisation. They highlighted the need for a clear transition strategy, transparent governance and robust collaboration to mitigate these risks. ACOG itself recognised that the UKADS could be a viable delivery

body for the London TMA region, but highlighted the potential risks (see quote below).

Quote

“ACOG is determined that airspace modernisation takes place as rapidly as possible in accordance with the regulatory process. We would fully expect that, for the LTMA, where there is a clear case for UKADS being positioned to deliver this objective more effectively than ACOG (through, for example, the merger of multiple ACPs into one), that a transfer of responsibilities should take place. However, we would highlight that there are major risks involved with this approach:

>The centralisation of design activity within UKADS creates a risk for capacity bottlenecks to arise (one of the advantages of the current system is the dispersed nature of the design service provision for low-altitude airport procedures meaning that bottlenecks are less likely to occur – though the risk of bottlenecks is still evident for monopoly providers of network design (NERL) and regulatory services (CAA).

>There could be further delay and loss of momentum due to the time and complexity involved in transferring knowledge and supporting data for a design to UKADS.

>It could remove focus from the LTMA, which represents an almost unparalleled challenge in terms of the technical and political difficulties of affecting change.

We would assume that in the absence of any fundamental change to the regulatory framework, any transfer to UKADS1 would need to take place in a manner that builds on the work already undertaken by the sponsors related to the CAP1616 process. It is unclear what steps if any would be needed to create a masterplanning framework for change though it is relatively easy to argue that such a single blueprint is only needed to guide multiple ACPs and where the whole design for multiple airports is rolled into one macro-ACP, the masterplan blueprint could be set out within the ACP itself. Importantly, to provide transparency and predictability for all parties, it would be helpful if the process, conditions, expectations and timeframes that would need to be met for transfer are properly set out in advance (it is also important that these are set out so that they cannot be easily challenged by any interested parties to suit their respective agendas). Care would also have to be taken that design work and analysis undertaken up to that point was fully captured and shared.”
[response from Airspace Change Organising Group]

Quote

“We agree that UKADS1 should take over ACOG’s current coordination as its roles and responsibilities would be covered by UKADS1/2. There is also the potential that ACOG might cause a hindrance to the process and operation if left in place. Besides, there is a risk of duplication of workloads, particularly for those persons whose jobs end up being closely related to the workings of both UKADS and ACOG.” [response from Prospect]

Quote

“The ACOG structure and remit has not led to the outcomes expected, however ADS1 will need to be able to focus on its primary task. Any necessary changes to the masterplan will need to be coordinated and integrated.” [response from Gatwick Airport Consultative Committee]

Quote

“There will be touchpoints between ACPs under UKADS1 and under ACOG. This will require a clear separation of roles and responsibilities between UKADS1 and ACOG, transparent governance for managing interactions between them and ACPs for which they are responsible, and an agreed approach to calculating benefits and prioritising deployments. A clear dispute resolution and escalation process should be in place for when issues cannot be resolved.” [response from Heathrow Airport]

Quote

“There is a real risk that as ADS is stepped up that there is 'brain drain' from ACOG, disabling its effectiveness to continue its tasks. The entire ADS service should subsume ACOG and its responsibilities, having another organisation involved AM makes it more complicated than necessary.” [response from a flight procedure designer working as a consultant]

Quote

““It is reasonable to propose that UKADS1 should take over ACOG’s current coordination and master planning role for a particular cluster. This transition would align with the overall goal of streamlining the airspace modernisation process and ensuring a more coordinated and efficient approach. Our initial understanding was that ACOG would resolve the trade-offs at the tactical level to help each individual ACP to progress. Clearly, ACOG has identified areas of concern/overlap, but not in enough detail to coordinate a resolution for each airport. Given the level of exposure and expertise within ACOG, it might be the best use of resource to subsume ACOG into UKADS1 if it can provide the tactical level focus.” [response from a consultancy]

Question 9: Do you agree that organisations should be able to continue sponsoring ACPs that are in scope of UKADS1 if UKADS1 is not able to prioritise them?

Figure 3.9: Responses to question 9

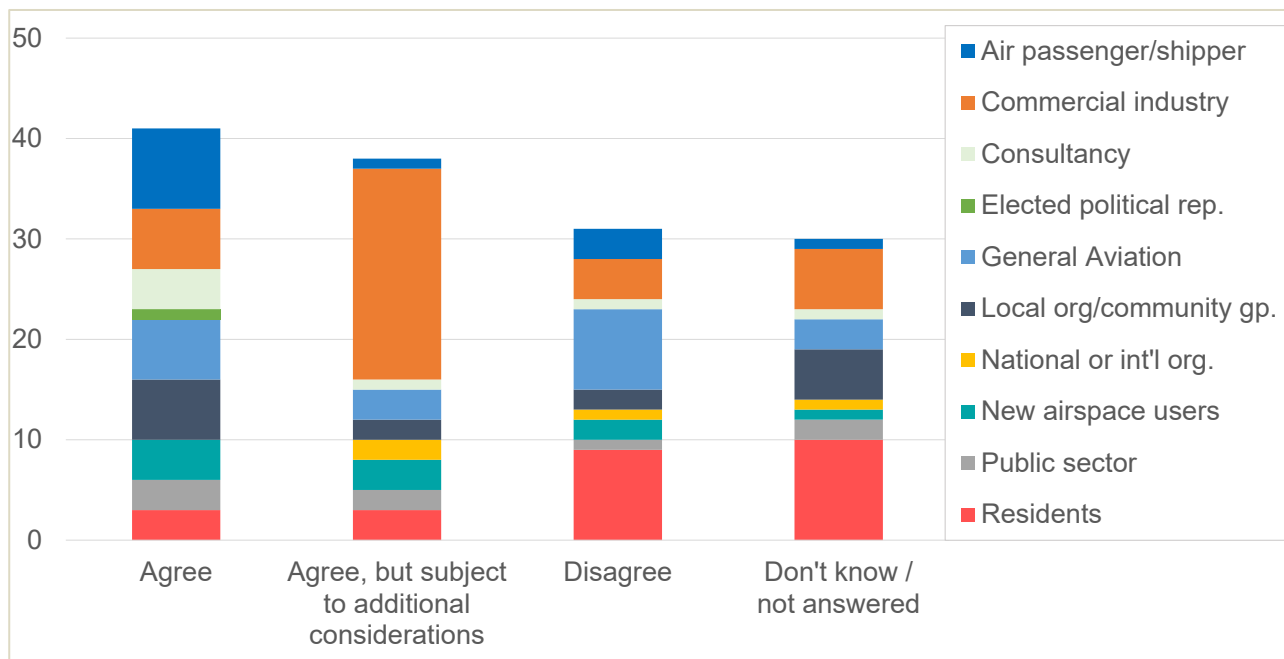


Table 3.9: Responses to question 9

Category	(a) Agree	(b) Agree, subject to additional considerations	(c) (a) + (b)	(d) Disagree	(e) Don't know/ not answered	(f) Total	(g) Agree total	(h) (a) + (b) total
Air passenger/shipper	8	1	9	3	1	13	62%	69%
Commercial industry	6	21	27	4	6	37	16%	73%
Consultancy	4	1	5	1	1	7	57%	71%
Elected political rep.	1	0	1	0	0	1	100%	100%
General Aviation	6	3	9	8	3	20	30%	45%
Local org/community	6	2	8	2	5	15	40%	53%
National/int'l organisation	0	2	2	1	1	4	0%	50%
New airspace users	4	3	7	2	1	10	40%	70%
Public sector	3	2	5	1	2	8	38%	63%
Residents	3	3	6	9	10	25	12%	24%
Total	41	38	79	31	30	140	29%	56%

3.39 Overall, responses demonstrated support for the proposal with 56% expressing agreement or conditional agreement in roughly equal proportions. 22% of respondents selected 'Disagree' and a similar proportion did not voice an opinion.

3.40 The Air Passenger, Shipper or Customer and Consultancy categories mostly agreed with the proposal, with 69% and 71% agreeing respectively, mostly

outright. 73% of the Commercial Industry category also agreed with the proposal, however, most did so subject to additional considerations (57%). New or Developing Airspace Users and Local Organisations were also overall supportive of the proposal. Residents Affected by Aviation were less positive, as 40% of respondents did not voice an opinion and a further 35% disagreed. The GA category was divided on the topic, with 45% expressing agreement or agreement subject to additional considerations and 40% expressing disagreement.

- 3.41 The free-text inputs outlined general support, recognising that the continuation of the previous sponsorship model for ACPs that UKADS cannot prioritise was justified as a way to avoid delays, maintain progress and reduce its workload. The proposed approach was seen as flexible and leveraging local expertise while preserving momentum for non-priority ACPs.
- 3.42 Some respondents highlighted the risk of creating a dual sponsorship system which could undermine the centralised purpose of the UKADS and lead to prioritisation discrepancies. Respondents also questioned how ACPs would be prioritised and whether commercial factors might influence decision-making. Linked to this, there were calls for clear governance structures to oversee the process, ensuring that prioritisation is transparent, resources are allocated effectively and that potential conflicts are managed. NATS proposed that co-sponsors should play a role in defining priorities based on benefits to end users.

Quote

“Yes, it would be a reasonable assumption that organisations can sponsor their own ACPs if UKADS1 cannot prioritise them. During early analysis of changes, should overlaps not occur, allowing some airports to progress their changes separately would add flex to the system where those organisations are not calling on the same stakeholders for comment. This approach would have several benefits such as:

- **Flexibility and Adaptability:** This allows a flexible approach to airspace modernisation, which enables organisations to progress important projects without relying solely on UKADS1.
- **Reduced Burden on UKADS1:** If you allow organisations to self-sponsor certain ACPs, it could help to alleviate some of the workload on UKADS1, enabling it to focus on higher-priority projects.
- **Local Expertise:** Organisations usually have specific knowledge and expertise related to their local airspace, and this can be leveraged to efficiently progress an ACP.”

[response from a consultancy]

Quote

“If some ACPs within the scope of UKADS1 are allowed to sponsor separately to “prioritize” them it would create more of a two-tier system, contrary to the objective of creating a single point system of airspace design in which all ACPs are equally sponsored. This may result in a further scenario of both systems running in parallel within UKADS1, which, as well as being poor resource management, would diminish the benefits and pre-UKADS2 evaluation of the impact of having the single point UKADS as sponsor for all ACPs.” [response from a General Aviation organisation]

Quote

“This would all come down to the prioritisation governance. It could go either of two ways – either smaller organisations could be put off by the scepticism of their proposal being de-prioritised under UKADS meaning that they don’t bother. Alternatively they could be encouraged by believing that NERL as UKADS could do some of the work they would otherwise have done.” [response from Guild of Air Traffic Control Officers]

Quote

“Wherever possible there should be a single organisation responsible for ACPs. Where it is agreed that a sponsor other than ADS1 can progress an ACP for coordination it will be essential and for efficiency the division/boundary, between the services of ADS1 and others, should be made flexible for efficiency. The density in the LTMA means a significant overlaps in any event and which needs to be recognized in the programming.” [response from Light Aircraft Association]

Quote

“The same problems that have been identified as justifying the centralisation of airspace-design change could be perpetuated.” [response from a resident affected by aviation]

Quote

“There may be a concern that ACPs out of scope of UKADS1 could end up being delayed beyond their current projected timelines if expertise is focused elsewhere or because of moral hazard issues related to access to funding resulting in airports outside the LTMA delaying their consulting work. Where clusters outside LTMA are already going ahead, care must be exercised to ensure these aren’t delayed by the UKADS or UKADS1 programme.” [response from an industry trade association]

Initial operating model, UKADS within NERL – outcome:

- As explained above, in the first phase we will require NERL to establish the UKADS as soon as possible to provide airspace design services. We propose that the NERL air traffic services licence would be [modified](#) such that the UKADS scope could be changed without a further licence modification.
- The consultation document proposed that ACOG would continue its role of coordinating masterplan ACPs, except in respect of the London cluster of the airspace change masterplan, where the UKADS would supersede it. We are adopting this approach, and in the interests of proportionality, the residual ACOG coordination role for non-London clusters will also be subsumed into NERL. The CAA will therefore consult on proposed modifications to the NERL licence to:
 - insert requirements to provide the UKADS functions, subject to which, the geographic scope for NERL to provide the UKADS as airspace designer and change sponsor will, in the short term, be the London TMA region, and
 - insert a revised coordination (but not design or sponsor) role for ACPs in other masterplan clusters, removing the requirement for a separate unit.
- Our reasoning is that it would be disproportionate to require NERL, through its licence, to maintain both ACOG to coordinate masterplan clusters outside London and the UKADS to design the airspace for the London cluster. That would risk duplication of effort by NERL (and by the co-sponsors in their oversight), inefficient operations and processes, and confusion among stakeholders. The revised approach has the advantage of potentially paving the way for extending UKADS scope to other clusters in the future, and facilitating knowledge transfer between the ACOG and UKADS functions. It may also help protect skills in the ACOG team that might otherwise be lost, given that ACOG's role is likely to diminish over time. For example, the West cluster now consists of only one airport (plus NERL), requiring minimal coordination by ACOG. Also, since the consultation was published, we have been reviewing which elements of the masterplan continue to add value. This will be part of a wider package of changes we will be proposing later this year to improve the effectiveness and proportionality of our process for airspace change. (See Policy Paper [UKADS 25/4](#) for further information.)
- NERL, as the provider of the UKADS, will be the sponsor of the single airspace design within its scope. This may include any new ACP that has a dependency on the single design already being sponsored by UKADS. However, its inclusion in scope is not automatic; an ACP that is not urgent or is of local rather than strategic benefit may not be prioritised. In such cases, the proposer of an ACP can – at least until a future time when UKADS undertakes all ACPs – sponsor the ACP themselves through the CAP 1616 process.

Questions 10 and 11: Remit for UKADS including ACP consultation

Question 10: Do you agree with the proposals for UKADS1's remit?

Figure 3.10: Responses to question 10

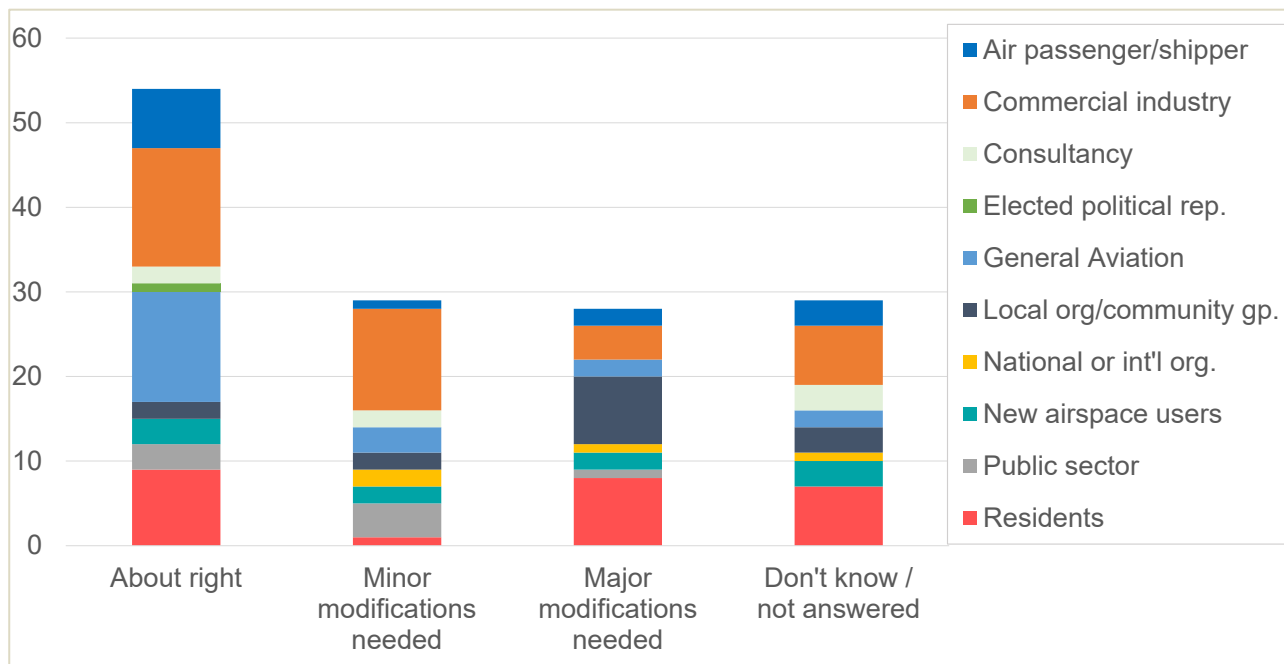


Table 3.10: Responses to question 10

Category	(a) About right	(b) Minor mod's needed	(c) (a) + (b)	(d) Major mod's needed	(e) Don't know/ not answered	(f) Total	(g) (a) total	(h) (a) + (b) total
Air passenger/shipper	7	1	8	2	3	13	54%	62%
Commercial industry	14	12	26	4	7	37	38%	70%
Consultancy	2	2	4	0	3	7	29%	57%
Elected political rep.	1	0	1	0	0	1	100%	100%
General Aviation	13	3	16	2	2	20	65%	80%
Local org/community	2	2	4	8	3	15	13%	27%
National/int'l organisation	0	2	2	1	1	4	0%	50%
New airspace users	3	2	5	2	3	10	30%	50%
Public sector	3	4	7	1	0	8	38%	88%
Residents	9	1	10	8	7	25	36%	40%
Total	54	29	83	28	29	140	39%	59%

3.43 The most common response regarding the UKADS1 remit was 'About right', selected by 39% of respondents, with a further 21% saying only minor modifications were needed. Another 20% indicated a need for major modifications.

- 3.44 Responses from Commercial Industry reflected the same pattern. More than half of Local Organisations suggested major modifications were needed. 38% of Public Sector respondents said 'About right' and 50% said minor modifications were needed. 55% of GA respondents selected 'About right' with 25% opting for major or minor modifications. The Air Passenger, Shipper or Customer category responses reflected a similar pattern. Residents Affected by Aviation were more divided, mostly split between 'About right', major modifications needed and 'Don't know'.
- 3.45 In free-text feedback, some respondents said the UKADS would be most effective if it were accountable for all aspects of an ACP. That should lead to an improved quality of ACPs through a standardised approach that would not be possible if confined to the airspace design element of an ACP alone. Others queried whether the option for the UKADS remit to be confined to airspace design only had been given sufficient consideration. Some respondents drew attention to the need for full cooperation between the UKADS as sponsor and the ACP partner, or sought greater clarity on who would be responsible for what in the airspace change process. Some raised concerns about whether NERL and the broader workforce have sufficient skills and capacity to deliver this remit effectively.
- 3.46 Respondents also called for clarity on how airports and other local stakeholders would remain involved in airspace change processes, how environmental considerations would be addressed and how public consultation and engagement would be managed.

Quote

"LLAO believes the assumption that UKADS1 has a remit which goes beyond [...] just designing airspace is logical and beneficial to the proposer of an airspace change. It will provide consistency in documentation, thus allowing for a higher chance of success if individual ACPs are combined or broken down into various deployments within the LTMA. Whilst LLAO have always used reputable suppliers for airspace change proposals, we acknowledge that some suppliers have not delivered their clients' needs to pass regulatory gateways, thus causing delays in the programme as a whole, so this is a significant mitigation. This is often due to the fact that regulatory compliance with CAP1616 can be challenging and when certain data has been used and cross referenced in another ACP, it can cause issues that the regulator cannot accept." [response from London Luton Airport Operations]

Quote

"UKADS1 would be most effective at airspace modernisation if it was accountable for all aspects of an ACP." [response from a General Aviation organisation]

Quote

“Overall, the proposed remit appears to be comprehensive; however, there are certain challenges and considerations with this remit. More detail is required with regard to the resourcing plan, funding mechanisms and how the lack of APDOs and Instrument Flight Procedure Designers within the UK country will be employed now and in the future. The remit should bring with it a more centralised coordination overseeing the entire airspace change process. If expertise and resources are concentrated in the right areas, then this will lead to enhanced expertise and capacity in the system where it is needed. There should be an improved quality of the ACPs through a standardised approach and quality control methodology, and all of this should lead to an accelerated modernisation of UK Airspace.” [response from a consultancy]

Quote

“Confirmation is needed that UKADS1 will undertake ALL necessary supporting environmental assessments to progress an ACP as there may be specific environmental needs in certain areas. The role of the partner must be facilitated with robust working arrangements and cannot be overlooked or just paid lip service. The sound working relationships within the current arrangements should be the foundation. A one size fits all for engagement and consultation will not work. UKADS1 must have stakeholder engagement/consultation/comms expertise to undertake the elements of any such activity, alongside the airport partners. Currently this expertise sits within each independent airport. The document states that UKADS1 will undertake the PIR, however, this MUST have input from the airport partner to ensure relevant complaint data is included. It will be of extreme interest to the airport community stakeholders. Agree that consultation materials must be standardised to help stakeholder understanding.” [response from Farnborough Airport]

Quote

“It is worth recalling that the main driver for the central design service proposal was to better address resolving interfaces between potentially-conflicting airspace change proposals. An alternative approach would have been to limit and focus the accountability of UKADS1 to creating a unified, ground-up TMA-wide design, taking current-state proposals as an input. This would aim to produce two deliverables:

- all proposals connected and brought to the same standard;
- key interfaces, where most attention is required, identified.”

[response from an airport]

Question 11: Do you agree with the approach we propose for consultation and engagement on ACPs, including who pays for these activities?

Figure 3.11: Responses to question 11

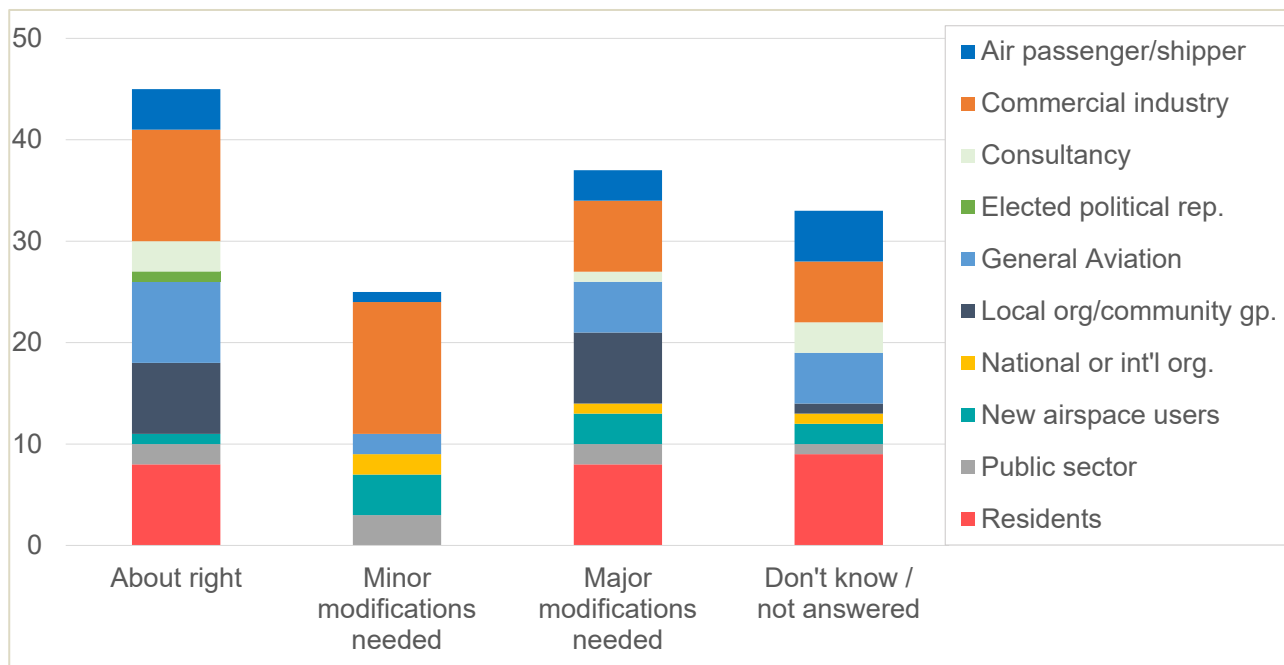


Table 3.11: Responses to question 11

Category	(a) About right	(b) Minor mod's needed	(c) (a) + (b)	(d) Major mod's needed	(e) Don't know/ not answered	(f) Total	(g) (a) total	(h) (a) + (b) total
Air passenger/shipper	4	1	5	3	5	13	31%	38%
Commercial industry	11	13	24	7	6	37	30%	65%
Consultancy	3	0	3	1	3	7	43%	43%
Elected political rep.	1	0	1	0	0	1	100%	100%
General Aviation	8	2	10	5	5	20	40%	50%
Local org/community	7	0	7	7	1	15	47%	47%
National/int'l organisation	0	2	2	1	1	4	0%	50%
New airspace users	1	4	5	3	2	10	10%	50%
Public sector	2	3	5	2	1	8	25%	63%
Residents	8	0	8	8	9	25	32%	32%
Total	45	25	70	37	33	140	32%	50%

3.47 Overall, stakeholder opinion indicated that the proposed approach was appropriate, with some room for refinement. Half the respondents said the proposal was 'About right' or that only minor modifications were needed. One third suggested major modifications were needed, and the remainder did not voice any opinion.

3.48 This sentiment was reflected among GA respondents, as 'About right' or 'Minor modifications needed' were selected by half of the respondents. The other half

was split equally between 'Major modifications needed' and 'Don't know' or no answer. Commercial Industry was more supportive and selected 'About right' or 'Minor modifications needed' in 65% of responses. A similar pattern was observed among the New or Developing Airspace Users categories, although with more caveated support.

- 3.49 More diverse views were present among stakeholders from the Air Passenger, Shipper or Customer and Residents Affected by Aviation categories. Their responses were approximately equally divided between 'About Right', 'Major modifications needed' and 'Don't know' or no answer. Similarly, the Local Organisations responses were almost equally split between 'About right' and 'Major modifications needed'.
- 3.50 Free-text responses varied in opinion. The content of some responses suggests that the extent of flexibility in the proposal may not have been understood. Some responses agreeing with the proposed framework recognised the importance of consistency and coordination in the consultation process. Some respondents emphasised the value of the current sponsors' established relationships with local communities, observing that airports are well equipped to lead consultations because of their local knowledge and trust built over time. Others saw a risk that local community groups could be marginalised because UKADS was a centralised body.
- 3.51 Some respondents requested further clarity around the division of consultation responsibilities between the UKADS and individual airports under various scenarios. Some highlighted the need for UKADS to have centralised accountability, or for joint consultation efforts to balance the UKADS system-wide perspective with local insights. Others saw value in the UKADS leading the consultation and engagement processes to ensure consistency.
- 3.52 There were differing views about who should pay for consultation activity. Several responses sought greater clarity on who may be expected to cover what costs under each scenario. There were some concerns over the potential for a disproportionate impact on smaller airports.

Quote

"LSA believes that a consistency in consultation and engagement is key for success, and therefore the management and accountability of these activities should sit with UKADS1." [response from London Southend Airport]

Quote

"There needs to be a clear and mandatory mechanism for UKADS to consider local stakeholders or you will be effectively disenfranchising local stakeholders and so be in breach of the Gunning principles." [response from Save our Skies Richmond Hill]

Quote

“Under the proposed UKADS, community groups would apparently have no direct relationship with UKADS but communicate second hand via the airports. Their influence would be diluted rather than enhanced. Long established relationships with the airports would count for very little in the decision-taking process, and any past understandings and undertakings thrown into doubt. When Local Organisations engage with an airport today, they can form relationships with key players, and both have the opportunity to form an understanding of the other’s perspective, albeit with an awareness that power and influence lies predominantly industry stakeholders – an imbalance that should be addressed.” [response from East Twickenham Heathrow Campaign]

Quote

“The cost of consultation should not be solely borne by an airport. If the benefits are in terms of UK PLC, then associated costs should be borne by UKADS1/the UKADS charge.” [response from Farnborough Airport]

Quote

“We are concerned that there will not be adequate regard to local distinctiveness and circumstances. The whole ADS concept appears driven by idea that ‘uniformity is necessarily good’ – whereas individual airport areas have evolved different procedures in response to different circumstances with the benefit of many years of local negotiation – voice for local LAs and communities and proper informed consideration for this must be maintained.” [response from Heathrow Strategic Planning Group]

Remit for the UKADS including ACP consultation – outcome:

- NERL, as the provider of the UKADS, will be the sponsor of the single airspace design within its scope. The UKADS will 'hold the pen' on that design, which means resolving design conflicts through trade-offs according to its mandate. That mandate will be to submit a single design that:
 - prioritises maintaining a high standard of safety, and
 - consistent with the Airspace Modernisation Strategy, secures system-wide benefits and overall network optimisation that results in the most efficient and resilient airspace network possible, while giving due consideration to local circumstances and environmental impacts.
- The airport, air navigation service provider or other organisation currently proposing an ACP will be a 'partner', with whom UKADS will work closely.
- The UKADS, acting collaboratively, will take on all aspects of delivering an ACP other than the safety case, implementation of the change (or associated provisions of air traffic services), and potentially some elements of consultation and engagement. The UKADS will need appropriate resource and expertise to lead and collaborate on a range of airspace change activities.
- ACPs will remain subject to consultation and engagement requirements in accordance with the airspace change process. UKADS will have overall accountability, coordinating consultation and engagement across airports as needed, and ensuring consistency of messaging, formats and common elements. Under partnering arrangements, the UKADS will agree with each airport or other organisation where responsibility rests for consultation and engagement tasks.
- The CAA will set out (in new CAP 1616 guidance) the respective roles and terminology involved in the partnership arrangements between UKADS and its partners. The guidance will ensure that consultation is kept proportionate and adds value, including taking into account meaningful local community engagement. It will be for the UKADS and relevant partner airports to discuss the costs relating to activities as part of any partnering arrangements.

Questions 12 to 15: Transition arrangements

Question 12: What are your views on our transition proposals?

Figure 3.12: Responses to question 12

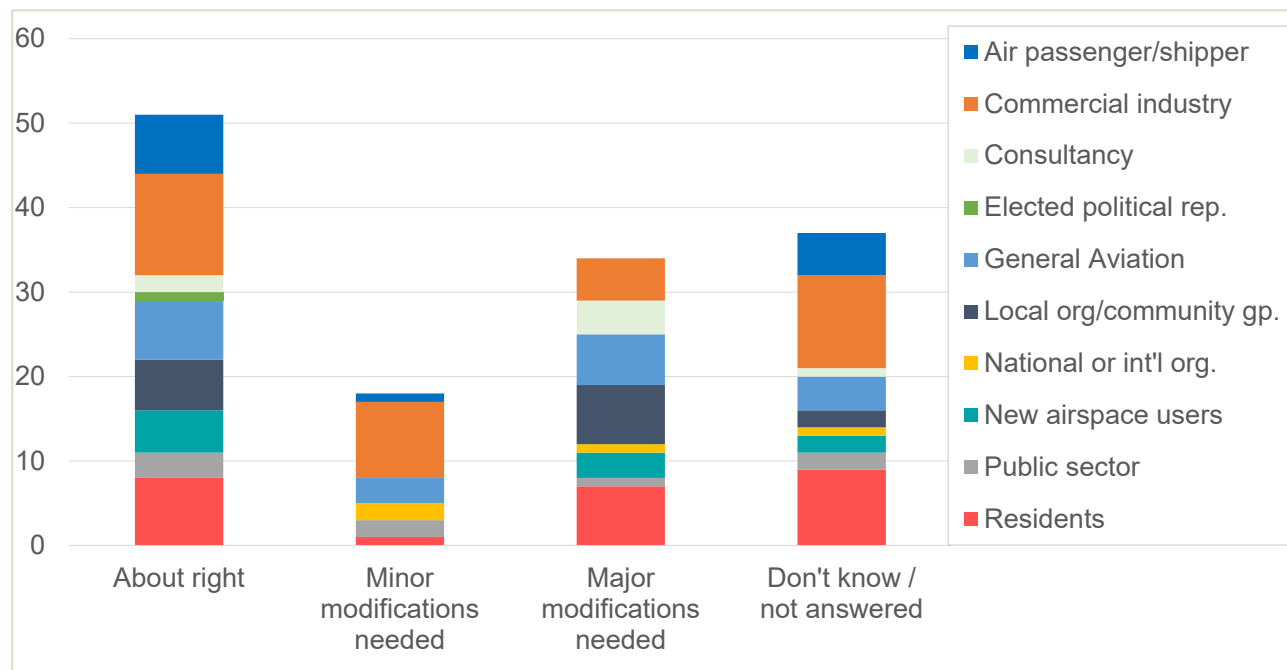


Table 3.12: Responses to question 12

Category	(a) About right	(b) Minor mod's needed	(c) (a) + (b)	(d) Major mod's needed	(e) Don't know/ not answered	(f) Total	(g) (a) total	(h) (a) + (b) total
Air passenger/shipper	7	1	8	0	5	13	54%	62%
Commercial industry	12	9	21	5	11	37	32%	57%
Consultancy	2	0	2	4	1	7	29%	29%
Elected political rep.	1	0	1	0	0	1	100%	100%
General Aviation	7	3	10	6	4	20	35%	50%
Local org/community	6	0	6	7	2	15	40%	40%
National/int'l organisation	0	2	2	1	1	4	0%	50%
New airspace users	5	0	5	3	2	10	50%	50%
Public sector	3	2	5	1	2	8	38%	63%
Residents	8	1	9	7	9	25	32%	36%
Total	51	18	69	34	37	140	36%	49%

3.53 Respondents were generally supportive of the transition proposals. Half of respondents opted for 'About right' or 'Minor modifications needed'. The other half was approximately equally split between 'Major modifications needed' and 'Don't know' or no answer.

3.54 Within the Commercial Industry group, 57% opted for 'About right' or 'Minor modifications needed'; 30% for 'Don't know' or no answer and 14% for 'Major

modifications needed'. A similar tendency was visible among the GA group, with 50% stating either 'About right' or 'Minor modifications needed'. Responses from Residents Affected by Aviation were almost equally split between the four options. Responses from Local Organisations were broadly split between 'About right' and 'Major modifications needed'.

- 3.55 Free-text responses recognised the importance of the UKADS building on existing work to avoid delays. Some respondents stated that ACP onboarding should occur as early as feasible, ideally before the Stage 3 gateway, to ensure a coordinated approach, provided flexibility is maintained. Some highlighted the need for sufficient resources within the UKADS and for co-sponsors to support the onboarding effectively and avoid bottlenecks, noting that timescales for the UKADS seemed ambitious when considering the scale and complexity of the transition.
- 3.56 Respondents also raised concerns that the preferred onboarding options could lead to the UKADS losing sight of existing design principle commitments made by previous sponsors, stressing the need for governance structures that prevent any decision-making biases. Multiple respondents highlighted that the onboarding arrangements would be dependent on how the CAP 1616 airspace change process would apply to the UKADS. Some noted that adjustments to the process may be necessary to accommodate onboarding, especially given the scale and complexity of merging multiple ACPs.

Quote

"The transition and clustering process should as a minimum respect existing Design Principles for the relevant ACP, which were developed over time and which reflect a lot of input from affected stakeholders as well as the sponsor."
[response from Airports UK]

Quote

"...If the purpose of the UKADS is to optimize design from an overarching point of view, it makes sense that, when taking responsibility for the ACPs, there is an opportunity for merging some of the initiatives, if there are advantages on it. Transfer of the ACP after Stage 2 of the process ("development and assess") but before Stage 3 ("Consult/engage") implies that design has already taken place, for those projects that have not finished this phase it might be beneficial that UKADS1 gets involved in design before the end of this stage, in order to avoid re-design. We understand there might be challenges if a design is already ongoing through potential contractual agreements. For the projects not having started Stage 2 it is better to transfer them before the design phase."
[response from IATA]

Quote

“It is unclear what will happen with all the work that has been carried out on individual ACP objectives and design principles in recent years. Local communities have provided significant input to this process and this must not be lost. It is important that valued, informed local sensitivity is not lost in centralising to a single entity for design.” [response from a public sector organisation]

Quote

“...the London ACPs should transfer to UKADS1 before the consultation phase starts as that is something that needs to be coordinated centrally. easyJet would just like to caution about the time it will take for UKADS1 to capture and consolidate all the work already undertaken by individual airports and emphasise the need to move at pace to avoid further delays to the programme. It is important that the CAA is appropriately resourced to ensure that all airport transition plans are approved as swiftly as possible.” [response from easyJet]

Quote

“We agree with the transition proposals in the main. However, it is also worth stressing the practical challenges involved with transitioning from the dispersed approach to one centralised in UKADS:

>From a regulatory perspective the nature of the transition between the current approach and the future UKADS1 will depend heavily on whether supportive changes to the CAP1616 regulation are required, for example around the approach taken to merging multiple ACPs into one and the changes in the roles involved; it will be important to get this framework right and coordinate clearly with stakeholders to ensure an efficient transition, maintain support for the design process, and avoid judicial or other challenges.

>From a technical perspective, the assumption is that UKADS will capture and consolidate all of the work already undertaken by each of the LTMA airports to detail their design options below 7000 ft, allowing them to build on the work undertaken to date and the expectations set with stakeholders. This will be a significant exercise; each of the LTMA airports has generated significant data in arriving at their Stage 2 options list. This consists of design files detailing possible procedures (larger airports in the system such as Heathrow may have hundreds of IFP designs for their options) as well as significant bodies of work such as complex noise modelling to justify their choices, stored in varying and sometimes incompatible file formats. We estimate that this essential process of collecting, standardising and validating all of the data from the airports could alone take many months.”

[response from Airspace Change Organising Group]

Question 13: What are your views on our proposal that, where appropriate, UKADS1 should merge the existing ACPs into a single ACP for the cluster or deployment?

Figure 3.13: Responses to question 13

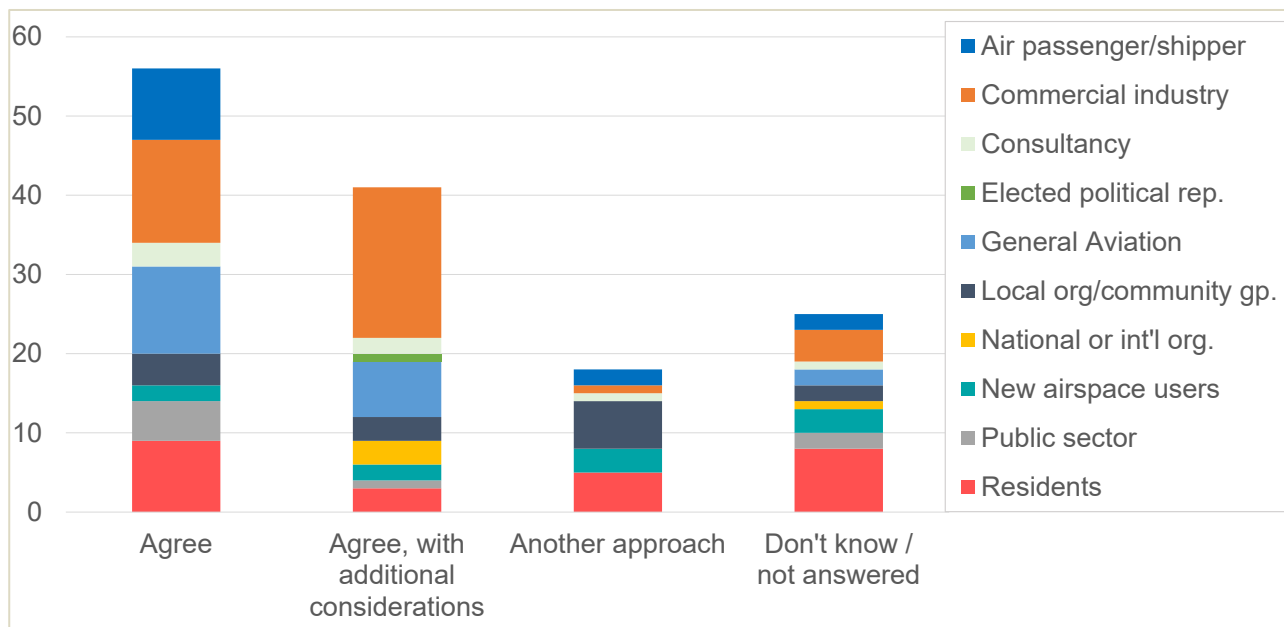


Table 3.13: Responses to question 13

Category	(a) Agree	(b) Agree, with additional considerations	(c) (a) + (b)	(d) Another approach	(e) Don't know/ not answered	(f) Total	(g) Agree total	(h) (a) + (b) total
Air passenger/shipper	9	0	9	2	2	13	69%	69%
Commercial industry	13	19	32	1	4	37	35%	86%
Consultancy	3	2	5	1	1	7	43%	71%
Elected political rep.	0	1	1	0	0	1	0%	100%
General Aviation	11	7	18	0	2	20	55%	90%
Local org/community	4	3	7	6	2	15	27%	47%
National/int'l organisation	0	3	3	0	1	4	0%	75%
New airspace users	2	2	4	3	3	10	20%	40%
Public sector	5	1	6	0	2	8	63%	75%
Residents	9	3	12	5	8	25	36%	48%
Total	56	41	97	18	25	140	40%	69%

3.57 Responses to the proposal to merge existing ACPs received considerable support, with 69% of respondents selecting 'Agree' or 'Agree, with additional considerations'. Only 13% of respondents suggested that an alternative approach should be considered, and the remainder did not voice an opinion.

3.58 This pattern was mirrored in the Consultancy, GA and Air Passenger, Shipper or Customer categories. Commercial Industry respondents also gave broad

support, but tended to caveat this, with ‘Agree, with additional considerations’ selected by 51%. Residents Affected by Aviation were more varied with 48% of the respondents selecting ‘Agree’ or ‘Agree, with additional considerations’, but 36% opting for ‘Don’t know’ or skipping the answer. Even greater variance was seen among Local Organisations which were divided between agreement and suggesting a need for another approach.

- 3.59 Free-text feedback highlighted the proposal as a positive step towards greater coordination and efficiency. Respondents recognised the benefits of increased structure and reduced duplication of effort, as well as the improved management of interdependencies. This in turn was seen as supporting more informed decision-making from a system-wide perspective. Responses highlighted the need for clearer detail on the process of merging ACPs, particularly when it comes to addressing the unique challenges and requirements of each ACP. As with the onboarding proposals, respondents questioned how existing work could be integrated and commitments upheld, and the importance of transparency, clear governance and accountability mechanisms. Some pointed out that ACPs are highly regulated by a complex process and merging them could be a logistical challenge and create unintended consequences.

Quote

“[We] support the proposal to merge existing ACPs into a single ACP for a cluster or deployment where appropriate, as it can streamline processes, reduce duplication, and enhance delivery efficiency.
 - Merging ACPs may introduce additional complexity, particularly if the ACPs were developed under differing frameworks or timelines. Care must be taken to avoid unnecessary delays caused by reconciling these differences.
 - The criteria for determining when and how ACPs are merged should be clearly defined and communicated to stakeholders. Without transparency, there is a risk of perceived or actual biases in prioritization.”
 [response from an airline]

Quote

“There should be clarity in the UKADS framework on the approach to merging ACPs with differing origins, design principles and stage 2 methodologies.”
 [response from an airport]

Quote

“Combining multiple ACPs into fewer, larger projects under differing processes increases the risk of judicial review (JR). Clearer guidance on transitioning ACPs is needed to mitigate this legal risk.” [response from a consultancy]

Quote

“NATS is concerned that any attempt to resolve the amalgamation challenges by augmenting the current process with additional policy could be subject to legal challenge. This would create a substantial risk for NATS as the proposed entity to deliver UKADS1. NATS agrees that for each deployment of the London cluster, a single airspace change proposal should be brought forward. However, NATS believes that this should be under an alternative, simplified regulatory model, underpinned by secondary legislation, to enable effective delivery.” [response from NATS]

Quote

“Merging ACPs must retain flexibility to address specific operational challenges unique to certain stakeholders, such as those operating from secondary airports.” [response from an airline]

Quote

“The legislation allows for ACPs to be accepted subject to conditions and we would like to see that possibility developed further so that elements of ACPs that were particularly controversial locally could be rejected or only approved subject to tight delivery conditions.” [response from Gatwick Area Conservation Campaign]

Quote

“There is real risk here that airspace change results in smaller airports being railroaded by larger ones, particularly those with NATS connections.” [response from Liverpool John Lennon Airport]

Question 14: What are your views on our proposal that the CAA approves each transition plan?

Figure 3.14: Responses to question 14

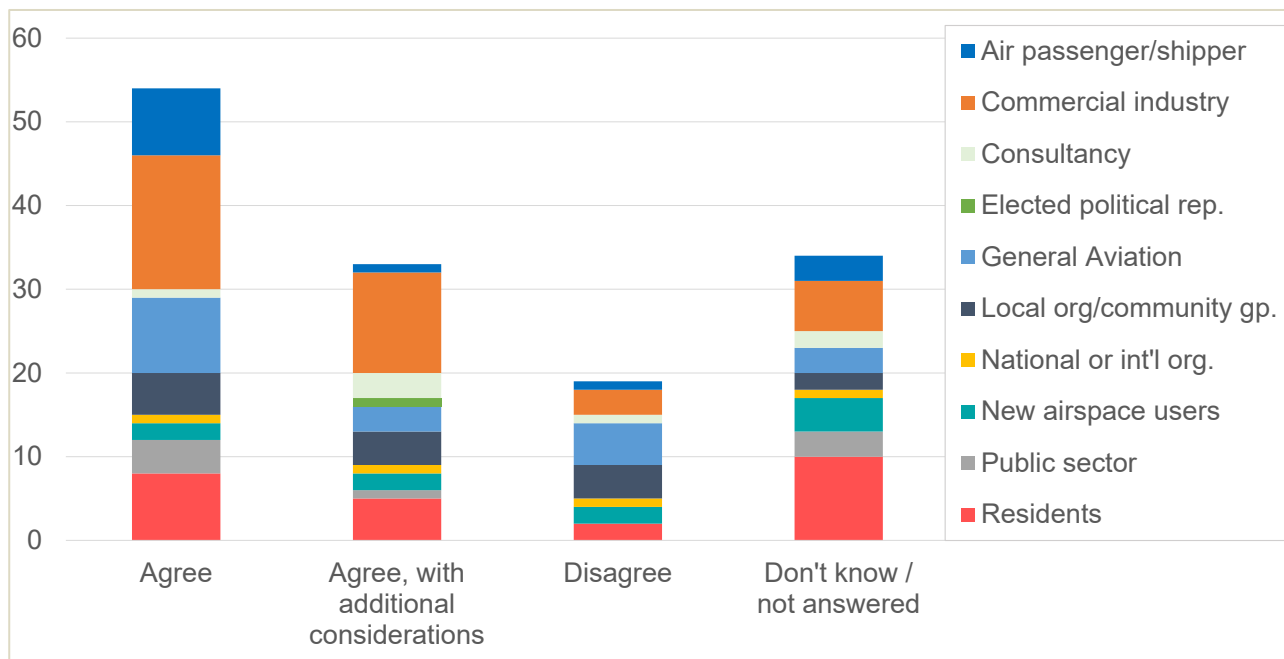


Table 3.14: Responses to question 14

Category	(a) Agree	(b) Agree, with additional considerations	(c) (a) + (b)	(d) Disagree	(e) Don't know/ not answered	(f) Total	(g) Agree total	(h) (a) + (b) total
Air passenger/shipper	8	1	9	1	3	13	62%	69%
Commercial industry	16	12	28	3	6	37	43%	76%
Consultancy	1	3	4	1	2	7	14%	57%
Elected political rep.	0	1	1	0	0	1	0%	100%
General Aviation	9	3	12	5	3	20	45%	60%
Local org/community	5	4	9	4	2	15	33%	60%
National/int'l organisation	1	1	2	1	1	4	25%	50%
New airspace users	2	2	4	2	4	10	20%	40%
Public sector	4	1	5	0	3	8	50%	63%
Residents	8	5	13	2	10	25	32%	52%
Total	54	33	87	19	34	140	39%	62%

3.60 Responses to the proposal on CAA approval of each transition (onboarding) plan were generally supportive as 62% of respondents selected 'Agree' or 'Agree with additional considerations', the former being the more common choice. There was a relatively high proportion of respondents who indicated 'Don't know' or skipped the question (24%). Only 14% of respondents disagreed with the proposal.

- 3.61 The Commercial Industry and the Air Passenger, Shipper or Customer responses followed the overall pattern. Residents Affected by Aviation also expressed overall agreement, although 40% opted for 'Don't know' or left the question unanswered. The Public Sector category displayed a similar pattern. 60% of GA respondents selected 'Agree' or 'Agree with additional considerations', followed by 'Disagree'. The most diverse views were from Local Organisations where responses were fairly evenly split among the four answers.
- 3.62 The free-text responses indicated a significant level of interest and support for the CAA's oversight throughout the onboarding processes. There was recognition that this could help ensure accountability and CAP 1616 compliance, underscored by an expectation that commitments made in earlier ACP stages would be adequately considered. Some respondents stressed the need for the CAA to be adequately resourced to handle this responsibility effectively, anticipating bottlenecks without additional resource.
- 3.63 There were some calls for more information and transparency on the envisaged approvals framework. Respondents highlighted that a clear framework would avoid inconsistencies. There were concerns that, without this, any approval process could become subjective, leading to delays and potential legal challenges. Some pointed to past experiences with the ACP gateway process, where stakeholders felt they had faced confusing CAA positions.

Quote

"We agree with the logic, but it is essential the Civil Aviation Authority are given the resources, both monetary and people, to allow this to happen. If there is any risk that this single approval process is not able to function effectively, an alternative plan and procedure needs to be put in place as soon as possible."
[response from an airline]

Quote

"As the overall programme co-sponsor and regulator for UK aviation, the CAA is best placed to assure and approve transition plans before they are adopted by UKADS. We suggest that this is done against a clear framework and set of standards to ensure there is consistency of approach and to minimise the risk of delays." [response from Heathrow Airport]

Quote

"The UK CAA should have little input with the FASI ACP transition plan or determination, because it lacks the capability and competence to assess the design detail of an ACP of this scale. Determination should be made by the Secretary of State based on recommendations from the CAA/NERL."
[response from London Biggin Hill Airport]

Quote

“The uncertainty is based on the CAA making the rules then approving whether the approved entity has done it correctly. If this is a clear evidence-based approach then yes. However, the CAA have demonstrated an ability for personal opinion to sway the existing ACP Gateway process. As an example, an airport meets with the CAA and the CAA experts state reasons for not meeting the Stage Gateway, airport returns having addressed these issues but as different experts are in the room, new expectations arise. This must be avoided at all costs, there must be consistency and continuity in any approval process.” [response from a consultancy]

Quote

“It will protect NERL and ensure that airspace change sponsors/partners see the Regulator acting as a truly independent body responsible for approving the transfer.” [response from Liverpool John Lennon Airport]

Transition arrangements – outcome:

- Before NERL can commence providing airspace design services, as required, and subject to further consultation in some cases, we need to consider amending or creating various legislation, policy documents, a package of changes to the process for changing airspace design, and propose modifications to NERL's air traffic services licence to add airspace design services as a specified service.
- For the London TMA region, the UKADS will start a single ACP from the beginning of stage 3 of the CAP 1616 airspace change process which will incorporate ACPs in the London cluster of the airspace change masterplan. This will therefore be prior to the stage 3 consultation phase of CAP 1616. The UKADS will then sponsor the ACP through the remaining stages of the airspace change process.
- The CAA is developing a process for the 'onboarding' of London cluster ACPs to the UKADS. As described in the consultation document, the UKADS will review the ACPs in the cluster and refine them as needed for consistency. We expect that the CAA would adopt a similar approach for any other ACPs the UKADS takes on in the medium term.

Question 15: What changes would you propose to amend and/or supplement CAP 1616 in order to accommodate the UKADS?

- 3.64 This question invited free-text responses only. Respondents emphasised the need for a streamlined regulatory framework that is both robust and flexible, enabling the UKADS to deliver large-scale airspace modernisation. Many

respondents suggested that the CAP 1616 process was overly complex, time-consuming and resource intensive. Regarding its application to the UKADS, some noted that changes would be needed to better accommodate a multi-airport ACP of significant scale and complexity. ACOG proposed the introduction of guidelines for how ACP partners could support and commit to the process.

- 3.65 Some respondents suggested that the CAA simplify CAP 1616, especially in stages 1 and 2, to enable more efficient delivery of airspace change. Another theme was the need for clearer, well-defined criteria and consistent application of CAP 1616 requirements. Suggestions included standardised templates, enhanced guidance on regulatory expectations, and the introduction of independent oversight mechanisms to ensure transparency throughout the process.
- 3.66 Some respondents advocated a revised approach to trade-offs between airspace efficiency, capacity and noise/environmental considerations. NATS explicitly called for simplified noise modelling and engagement, highlighting that current processes are overly complex and difficult for stakeholders to interpret, and further suggested that an overhaul of the current model, underpinned by secondary legislation, was required to enable effective delivery.
- 3.67 Some responses mentioned the importance of clearly defined roles and responsibilities within the CAP 1616 process. Stakeholders suggested that clearer delineation would help avoid ambiguities, ensuring that all parties understood their roles and the expectations placed upon them. There were requests for a greater emphasis on meaningful stakeholder engagement, stressing the importance of involving local communities affected by airspace change throughout the process of airspace design and implementation.
- 3.68 Some respondents expressed concerns that CAP 1616 had only recently been revised, yet further changes were now under consideration. They questioned the effectiveness of previous updates, noting that core issues remain unresolved and that additional revisions could introduce further complexity. These concerns highlighted the need to balance process improvements with maintaining stability and certainty for stakeholders.

Quote

“CAP 1616 is still a cumbersome process which, as written, is intended for singular airport / sector airspace changes. It is not designed to cope with the system-wide changes envisaged from merged ACPs affecting multiple airports and across lower and upper flight levels. Therefore, in looking holistically at airspace design in the UK a process is required that maintains a proportionate and tailored approach encompassing transparency and rigour but that can also accommodate complex airspace changes. CAP 1616 requires radical

amendment to optimise it for the creation of the UKADS.” [response from The Royal Aeronautical Society]

Quote

“Scottish airspace modernisation, which involves only Glasgow and Edinburgh Airports and NERL and was intended to be the quickest and most simple of the Cluster projects, is currently stuck at Stage 3 [...]. The scale of submission for just this stage of the 7-stage process amounted to 2,500 pages which is not sustainable in the context of London TMA..” [response from NATS]

Quote

“One way forward for the South East change may be for the DfT and CAA to consider formulating an appendix to CAP1616 that would specify how a single design entity (UKADS1) could take a single multiple airport ACP through the process.” [response from easyJet]

Quote

“Any change must ensure that the amended process properly balances the needs of all key stakeholders, including local communities, and adheres to legal requirements, notably the Gunning Principles on consultation.” [response from East Twickenham Heathrow Campaign]

Quote

“CAP 1616 and the RACI should allow for UKADS to take on consultation and engagement functions but not mandate that. Where an airport has sufficient and appropriate resourcing and expertise, those duties should remain the responsibility of the current ACP sponsor.” [response from Heathrow Airport]

CAP 1616 airspace change process – outcome:

- The CAA's CAP 1616 airspace change process will continue to form the basis of the regulatory framework for airspace change, adhering to the requirements on safety, environmental, economic and operational assessment. The CAA will review and consult on further changes to CAP 1616 by September 2025.
- In addition, to address the specific circumstances of a single design entity with multiple partners, the CAA will, subject to consultation, introduce new CAP 1616 guidance applicable only to UKADS-sponsored ACPs.

Questions 16 and 17: Governance

Question 16: What are your views on our proposals for UKADS1 governance?

Figure 3.15: Responses to question 16

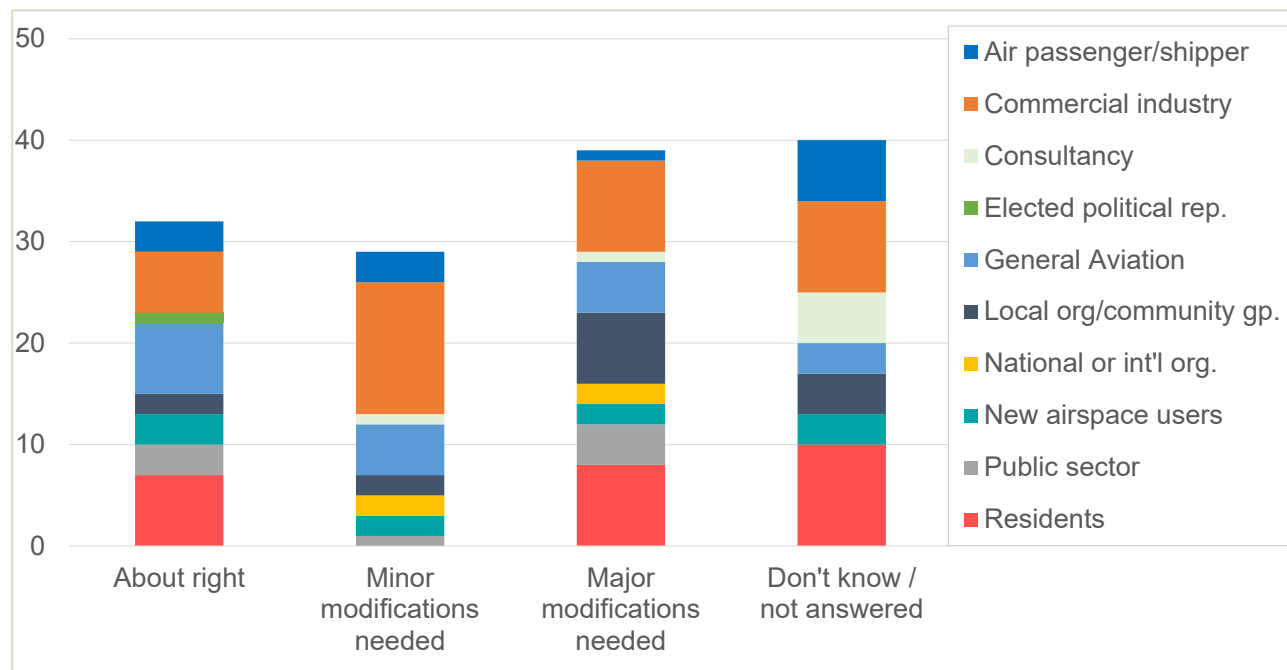


Table 3.15: Responses to question 16

Category	(a) About right	(b) Minor mod's needed	(c) (a) + (b)	(d) Major mod's needed	(e) Don't know/ not answered	(f) Total	(g) (a) total	(h) (a) + (b) total
Air passenger/shipper	3	3	6	1	6	13	23%	46%
Commercial industry	6	13	19	9	9	37	16%	51%
Consultancy	0	1	1	1	5	7	0%	14%
Elected political rep.	1	0	1	0	0	1	100%	100%
General Aviation	7	5	12	5	3	20	35%	60%
Local org/community	2	2	4	7	4	15	13%	27%
National/int'l organisation	0	2	2	2	0	4	0%	50%
New airspace users	3	2	5	2	3	10	30%	50%
Public sector	3	1	4	4	0	8	38%	50%
Residents	7	0	7	8	10	25	28%	28%
Total	32	29	61	39	40	140	23%	44%

3.69 The largest proportion of responses selected 'Don't know' or did not answer (29%) closely followed by 'Major modifications needed'. Only 23% suggested the proposal was 'About right' while 21% suggested 'Minor modifications needed'.

3.70 This pattern was visible among the various stakeholder categories. Residents Affected by Aviation mostly selected 'Don't know' or skipped the answer (40%), followed by 'Major modifications needed' (32%) and 'About right' (28%).

Approximately half of the Air Passenger, Shipper or Customer category respondents opted for 'Don't know' or did not answer, while the other half collectively expressed agreement or the need for only minor modifications, and only one suggested that major modifications were required.

- 3.71 Commercial Industry responses were more supportive, with 51% of respondents believing the proposal was 'About right' or that only minor modifications were needed. The remaining responses were split equally between 'Major modifications needed' and 'Don't know' or no answer. New or Developing Airspace Users had a more divided perspective, spread broadly equally across all four options, as were GA responses.
- 3.72 UKADS governance featured in free-text responses to multiple questions throughout the consultation. The principal point made related to UKADS independence because of the proposed tasking to NERL. There was an emphasis on the need for clear separation between UKADS operations and NERL's other revenue-generating functions to avoid the perception of conflicts of interest or inappropriate influence. Respondents emphasised that transparency would be key, arguing that giving stakeholders visibility on how decisions are made would provide assurance.
- 3.73 While there were many calls for strong governance and oversight procedures, some stakeholders suggested that the proposed governance structure could become overly bureaucratic and complex, and that too many reporting lines could slow the UKADS down. Some respondents proposed simplifying the interactions between different governance bodies, such as the CAA, DfT and Advisory Board. NATS argued that too much separation would be impracticable, as the UKADS would be reliant on existing facilities, resources, and tools to deliver its functions effectively. The proposed Advisory Board was recognised as a key governance tool, and its membership, role and authority were central themes (see question 17).

Quote

“Concerns that increased condensing of administrative bodies makes organisations and authorities more and more inward looking and less concerned with the wider world and populace, effectively empowering themselves further to mark their own homework. This was exemplified perfectly with the demise of ICCAN. And in that case alone has aroused suspicions of contrivance.” [response from a resident affected by aviation]

Quote

“We are concerned to ensure that UKADS1’s decision making is transparent and impartial without bias or perceived bias. As some beneficiaries of the airspace change are shareholders of NERL, who are the preferred choice for delivering UKADS1, there is inevitably a risk of a conflict of interest.” [response from Manchester Airports Group]

Quote

“Transparency is needed on how conflicts of interest (and perceived conflicts), particularly NERL’s Regulatory Period (RP) settlement and Long-Term Incentive Plan (LTIP), will be managed in practice. [...] Independent assurance functions and a permanent oversight team should be added to strengthen accountability and unbiased decision-making.” [response from a consultancy]

Quote

“In establishing a single design entity with overall control of the process, it must be recognized that various partners (who will be expected to own the consultation and hazards/risks, as well as service the airspace) will likely have competing needs and priorities. Therefore formal principles for dispute resolution, perhaps including an independent appeals process, should be established in advance in order to protect the interests of all concerned.” [response from Isle of Man Civil Aviation Administration]

Quote

“AMS governance can’t sit to one side of the hierarchy and be talking to both ADS1 and the Advisory Board. It’s correct position is overseeing ACOG and ADS1 compliance and achievement against the AMS with the Advisory Board to assist.” [response from Light Aircraft Association]

Quote

“Given the claim that sustainability runs through the programme, it is not clear who will provide oversight of this commitment on the Advisory Board: consumer and industry representatives will both have wider interests (which may often be competing with issues viewed as important by communities), and will not have an understanding of the issues that impact on communities. (...) we support the creation of an independent Environmental and Health Advisory Board (EHAB) to advise the Government, Parliament and the CAA. The EHAB should be recognised as a statutory consultee in relation to the ACP.” [response from Aviation Environment Federation]

Quote

“Strong oversight from the Advisory Board will be important as provided by the Steering Committee in the case of ACOG. From the supporting organisational illustration, the Advisory Board’s primary role would appear to ensure that UKADS is run in a manner consistent with its licence and strategic plan. It is assumed here that oversight and possible appeals against decisions made would be provided separately by the Co-sponsors. To do its job properly and scrutinise decisions, the Advisory Board will need access to the right information, including from independent sources where necessary.” [response from [response from Airspace Change Organising Group]

Quote

“NATS supports the governance proposals including appropriate amendments to NERL’s licence conditions to take on the role of UKADS1. However, the consultation document suggests separation of functions and ethical walls between UKADS1 and the rest of NATS which we do not believe would be practical. To deliver its function, UKADS1 would require access to NATS’ facilities, resources, and tools. It is NATS’ view that UKADS1 should be set up as a function within NERL. NATS supports the view that UKADS will be under strategic direction from the CAA/DfT who will set the priorities and requirements for the airspace design and ultimately decide on any approval to implement. The impartiality of UKADS could be upheld through (i) the development processes it employs for ACPs, (ii) reference to existing requirements to provide NERL’s licensed activities without undue discrimination between different users of its services with oversight from its independent directors, and (iii) its associated governance mechanisms (such as the proposed Advisory Board and the reporting arrangements to the DfT and CAA co-sponsors).” [response from NATS]

Question 17: Would these proposals give sufficient reassurance that potential conflicts of interest arising from NERL providing airspace design services through UKADS1 are mitigated?

Figure 3.16: Responses to question 17

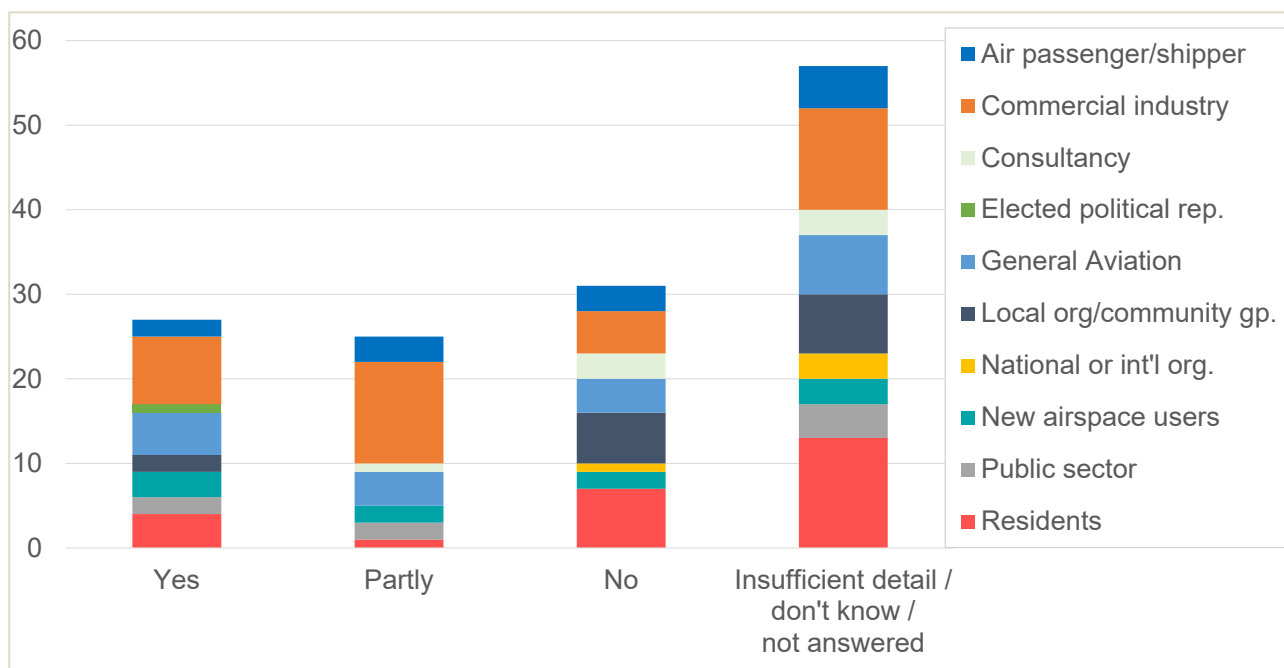


Table 3.16: Responses to question 17

	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
Category	Yes	Partly	(a) + (b)	No	Insufficient detail/ don't know/ not answered	Total	Yes total	(a) + (b) total
Air passenger/shipper	2	3	5	3	5	13	15%	38%
Commercial industry	8	12	20	5	12	37	22%	54%
Consultancy	0	1	1	3	3	7	0%	14%
Elected political rep.	1	0	1	0	0	1	100%	100%
General Aviation	5	4	9	4	7	20	25%	45%
Local org/community	2	0	2	6	7	15	13%	13%
National/int'l organisation	0	0	0	1	3	4	0%	0%
New airspace users	3	2	5	2	3	10	30%	50%
Public sector	2	2	4	0	4	8	25%	50%
Residents	4	1	5	7	13	25	16%	20%
Total	27	25	52	31	57	140	19%	37%

3.74 37% of respondents either fully or partly agreed that the proposed model gave sufficient reassurances around potential conflicts of interest. However, 41% opted for 'Insufficient detail / Don't know' or did not provide an answer, while 22% selected 'No'.

- 3.75 Residents Affected by Aviation, Local Organisations and National or International Organisations mostly responded 'Insufficient detail / don't know' or skipped the question, with 'No' being the next most common answer. 38% of Air Passenger, Shipper or Customers opted for 'Insufficient detail / Don't know' or did not provide an answer, followed by 23% who chose 'Partly' and an equal amount selecting 'No'. GA respondents were slightly more positive, as while 35% expressed uncertainty or did not give answer, 25% selected 'Yes', followed by 'Partly' and 'No', each amounting to 20% of their responses. New or Developing Airspace Users gave responses that were almost uniformly split between the four answers. Commercial Industry responses were supportive overall, with 54% either fully or partly agreed, 32% opting for 'Insufficient detail / Don't know' or did not provide an answer and 14% disagreeing.
- 3.76 Free-text responses emphasised that the Advisory Board was key to governance. While some saw it as a positive starting point, many argued that current proposals may not fully mitigate potential conflicts of interest. Composition was variously suggested to include representation from airlines, airports, overflowed communities, local government, national environmental groups, Future Flight representatives, independent experts and others. However, others cautioned that a broad membership could complicate and delay decision-making, potentially undermining the gains the UKADS is intended to deliver.
- 3.77 Respondents also sought clarity on how the board would make decisions and whether it would have the authority to enforce them or merely serve in an advisory capacity. There were calls for the Advisory Board to have decision-making powers and the authority to hold the UKADS accountable. Several submissions emphasised the importance of publicly accessible governance procedures, including the publication of Advisory Board meeting minutes. There were also calls for a formalised appeals process, allowing stakeholders to challenge UKADS decisions, or questions about how disputes would be resolved. Some submissions stressed that CAA oversight alone would not be sufficient and proposed the introduction of independent auditing and reviews.

Quote

“Although the stated approach to UKADS1 governance may be considered broadly acceptable, it would seem to have little place for existing community and specialist interest groups that to date have been included in non-statutory engagement activity on the ACP process and now, with the creation of UKADS1, should arguably be represented on the Advisory Board or at least have a UKADS team member assigned as a point of contact.” [response from a resident affected by aviation]

Quote

“We recommend no member of the advisory body should be associated to any commercial entity within the decision-making process of LTMA progress.”
[response from London Luton Airport Operations]

Quote

“It is important that the board is an accurate reflection of the diversity of stakeholders impacted by modernisation. Diversity of airspace users, interests and vested industries will help to ensure the board functions as it should.”
[response from Scottish Power Renewables]

Quote

“...the board need to be able to determine not just whether the UKADS1 decisions are impartial but are they the right solution. The make up of this board therefore needs to be such that if there are concerns raised by any airspace change partner or other relevant stakeholder about the decisions that UKADS1 reach, that they can be explored and sufficiently understood. [...] if the board disagree with a decision when asked to review it, what authority do they have to request or require change? Given that the co-sponsors of CAA and DfT have statutory duties in regards to ACP decision making they are unlikely to be a potential route for further escalation as this could present a conflict of duties. [...] There should be clear and transparent process by which any concerns can be escalated to the board. There should be an appeal or complaints procedure set up as part of creating UKADS1. For example, one that enables relevant stakeholders to first raise issues with UKADS1 and then if necessary raise to the board, with the stakeholder being able to do so directly provided the initial issue process has been followed. It may be appropriate to ensure that any such issue/complaints are in the public domain to an appropriate level of detail to ensure transparency. The minutes of the board meetings may also be appropriate to publish to further show transparency on what UKADS1 is sharing with the board.” [response from UKRI – Future Flight Challenge]

Quote

“Any internal separation of functions over and above the normal accountabilities for delivery and management of resources between different teams within NATS would likely increase cost, add complexity, and risk delay, for no additional benefit to users. However, as per the Licence change consultation, we would support a prohibition on cross subsidy between UKADS and other NERL services.” [response from NATS]

Quote

“We broadly support the governance structures that are set out in the consultation document, however, how the structures operate will also be critical and on this the consultation document is silent. We note that there is no indication on how UKADS1 will take the crucial decisions that:

- trade-off the competing interests of different airports, or
- the factors they will consider and what weight these factors will be accorded.

Similarly, there is no indication of:

- what will happen should an airport or other partner feel they have not been properly and impartially considered and how these concerns might be heard/considered,
- whether and how a UKADS1 proposal, at issue, can be challenged/reviewed,
- any mechanism that will be followed in the event of challenge/a requirement to review.

By leaving these questions unanswered, this consultation only partially addresses the governance issues. These points would need to be addressed by a transparent process and associated guidance.” [response from Manchester Airports Group]

Quote

“...the value and truth of the proposals must be judged based on direct experience. Surely, a better way to provide reassurance around potential conflicts of interest would be through CAA oversight or auditing.” [response from Liverpool John Lennon Airport]

Governance – outcome:

- The DfT and CAA will hold the NERL Board to account for the performance of the UKADS. NERL will be responsible through the obligations in its licence, and NATS will be indirectly responsible through its ownership of NERL. UKADS activities will be subject to DfT/CAA oversight through existing AMS governance arrangements, and will include regular, transparent progress reporting. See Policy Paper [UKADS 25/2](#) for further information.
- Before NERL can commence providing airspace design services, we will make an amendment to the Air Navigation Directions, lay new statutory instruments, and propose modifications to NERL's air traffic services licence to add airspace design services as a specified service.
- The set-up within NERL and the governance arrangements will be designed so that the UKADS is fair, acts in the interests of the UK aviation system as a whole, and is effective in progressing airspace change without the potential for conflicts of interest. The UKADS will make decisions based on evidence and transparent processes, and in line with DfT/CAA guidance.
- The DfT and CAA will require NERL, through the UKADS, to set the structure, membership and terms of reference of the Advisory Board. The Advisory Board will not be a decision-making body. The DfT/CAA will use existing AMS governance arrangements to monitor how NERL is responding to issues raised.
- While the UKADS will be expected to make choices relating to the design of airspace, responsibility for regulatory decisions on ACPs will remain with the CAA. In the event of a dispute between the UKADS and another stakeholder, the UKADS will present to the CAA, as decision maker, its airspace design proposal(s), along with a supporting rationale for its design choices and an articulation of the dispute. The designated service provider of the airspace that is the subject of any design change decision made by the CAA will be required to implement the airspace design.

Questions 18 and 19: Funding for UKADS and proposed UK Airspace Design Support Fund

Question 18: What are your views on our proposed new Airspace Design Charge to meet the efficient costs of NERL in providing an airspace design service through UKADS1 and to create a UK Airspace Design Support Fund for other eligible UK airport ACPs?

Figure 3.17: Responses to question 18

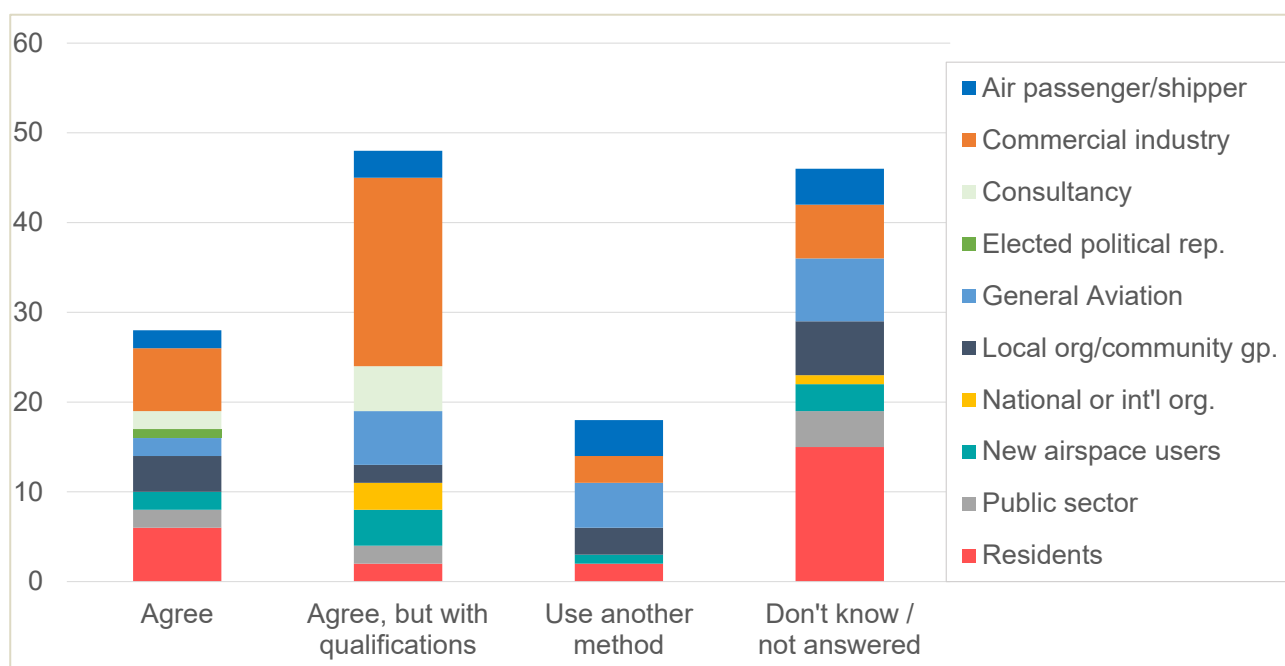


Table 3.17: Responses to question 18

	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
Category	Agree	Agree, but with qualifications	(a) + (b)	Use another method	Don't know/ not answered	Total	Agree total	(a) + (b) total
Air passenger/shipper	2	3	5	4	4	13	15%	38%
Commercial industry	7	21	28	3	6	37	19%	76%
Consultancy	2	5	7	0	0	7	29%	100%
Elected political rep.	1	0	1	0	0	1	100%	100%
General Aviation	2	6	8	5	7	20	10%	40%
Local org/community	4	2	6	3	6	15	27%	40%
National/int'l organisation	0	3	3	0	1	4	0%	75%
New airspace users	2	4	6	1	3	10	20%	60%
Public sector	2	2	4	0	4	8	25%	50%
Residents	6	2	8	2	15	25	24%	32%
Total	28	48	76	18	46	140	20%	54%

- 3.78 54% of respondents expressed support for the proposal, with 20% selecting 'Agree' and 34% 'Agree, but with qualifications'. 13% suggested another method and 33% opted for 'Don't know' or did not answer.
- 3.79 76% of the Commercial Industry category supported the proposal, mostly with qualifications (57%). Of the nine responses from airlines or airline organisations, one said 'Agree', seven said 'Agree, but with qualifications' and one said 'Use another method'. Of the 15 airports, airport organisations or ANSPs responding, four said 'Agree', nine said 'Agree, but with qualifications', one said 'Use another method' and one said 'Don't know'.
- 3.80 New or Developing Airspace Users and Consultancy stakeholders responded in a similar way to Commercial Industry. Only 38% of Air Passengers, Shippers or Customers supported the proposals, mostly with qualifications; 31% chose 'Use another method' and 31% chose 'Don't know' or did not answer. The GA category responses reflected a similar pattern. Residents Affected by Aviation mostly responded 'Don't know' or did not answer (60%).
- 3.81 The free-text responses supported the 'user pays' principle in theory, recognising that those who benefit most should bear the cost of airspace modernisation. There were calls for the charge to be applicable to all users that benefit from airspace change, whereas GA respondents argued that they should not pay the charge. Respondents emphasised the need for an equitable funding mechanism, with some calling for a hybrid model that balances user fees with government funding.
- 3.82 There was a recurring theme of respondents calling for greater clarity and transparency in how the Airspace Design Charge and the Airspace Design Support Fund would be calculated and administered. While generally acknowledging the importance of the fund to provide support to airports outside the London TMA region, respondents stressed the importance of detailed, transparent reporting on how funds would be allocated and used, with strong oversight to ensure fairness and prevent conflicts of interest – particularly if NERL is the fund administrator. Some responses suggested a need for independent oversight, with some proposing that the CAA or another neutral body manage the fund.
- 3.83 NERL expressed support for the principle but raised concerns about the lack of clarity around the scope and eligibility of both the charge and the UK Airspace Design Support Fund. Given the CAA's public accountability and relevant experience, NERL suggested that it would be better if the CAA administered the fund rather than NERL/UKADS.
- 3.84 Some respondents considered the estimated costs to be low given the magnitude of work required, with others requesting more detailed cost breakdowns and assurances that the system would deliver value for money.

Respondents also highlighted past cost overruns in similar projects, questioning NERL's ability to manage the programme efficiently without inflating costs.

Quote

"We expect the costs of consultations to be passed on to airlines through higher airport charges and that an additional fund administered by NERL would similarly result in further costs that airlines will pay. We recognise that airlines will be among the main beneficiaries of the improvements that a modern airspace system will bring since it will enable more efficient operations and increase airspace capacity. We note that consumers will also benefit through reducing delays and shortening flight times, and that wider society benefits from reduced harmful emissions." [response from an airline]

Quote

"Under the user pays principle, all airspace users benefiting from airspace design should be required to fund this project. This includes military airspace users, general aviation, drones and high airspace operations, which might have airspace design requirements. It should also include airports where they benefit from the airspace design." [response from Airlines for America]

Quote

"General Aviation (GA) traffic should not be charged. In particular private flying and flight training. Any methodology for implementing the charge on GA traffic, either on aircraft transiting through UKADS1 defined airspace or landing at airfields situated within that region [...] would have substantial negative consequences [...] for General Aviation" [response from a General Aviation organisation]

Quote

"...detailed and transparent reporting of how the Airspace Design Charge is calculated and utilized is essential to build confidence among stakeholders. Clear accountability for both NERL's costs and the UK Airspace Design Support Fund is critical." [response from an airline]

Quote

"It cannot be right that the stakeholders least able to meet the costs of responding to changes, and most likely to be adversely affected, are the only ones whose costs would not be met from the charge. Funds from the proposed UK Airspace Design Charge should also be used to cover the costs of providing authoritative independent advice to communities on the impacts of proposed changes." [response from Aviation Environment Federation]

Quote

“...full financing of this function through en route and terminal charges (London Approach) would be inappropriate and would not follow the User Pays Principle (UPP) as users other than commercial airlines and business aviation would be benefiting of this function while not contributing financially (military aircraft, general aviation, RPAS and High Airspace Operations).” [response from IATA]

Quote

“A consistent approach to funding of airspace change must be introduced through UKADS1, it is not right, fair, or equitable to expect non-LTMA based airports to deliver and fund their airspace changes purely because of their geographical location while southern airports receive full support, funding and associated benefits.” [response from Liverpool John Lennon Airport]

Quote

“Given the pressure on us to deliver our ACPs at our own expense, we’re also concerned that the introduction of such a financing mechanism will unintentionally incentivise some airports to pause ongoing efforts until funding becomes available in 2025 or later. That is simply not an option for Scotland given the pressure on the masterplan and the need to deliver and it is unfortunate that we’re being put in this position.” [response from Edinburgh Airport]

Quote

“Airspace is part of The UK’s NATIONAL infrastructure. Although users (including the Ministry of Defence) should pay, Central Government should also therefore provide some financial support.” [response from an individual in General Aviation]

Quote

“In principle moving the bulk of financial outlay away from airports, to more directly target the beneficiaries, will reduce programme risk and address the practical challenges that have arisen.” [response from Manchester Airports Group]

Quote

“Concerned about existing charges that are some of the highest in the world. However, this work needs to be done and expeditiously. There seems to be a wide range of estimates and these projects always have cost overrun so there doesn’t seem to be any cost capping mechanism.” [response from British Airline Pilots Association]

Quote

“NATS supports the ‘user pays’ principle for funding UKADS1 and has no objection in principle to a separate UK Airspace Design Charge. [...] The scope of the UK Airspace Design Charge and the UK Airspace Design Support Fund is unclear. The consultation document references the funding of “all UK airspace change” and “all eligible UK airport ACPs”. In either case, the eligibility criteria for the fund remains unclear. [...] It is also unclear how this would be expanded in future to cover the full extent of UKADS2 which would include sponsors without direct benefit to airlines, e.g. windfarm developers and New Airspace Users.

NATS opposes the view that airports should pay for engagement and consultation as this would create unnecessary levels of complexity for both airports and UKADS1. This approach would give an effective veto to airports to decide whether to progress or not as they would be unwilling to fund engagement and consultation on designs they may not fully support.

Additionally, some airports may not have the funding required to support engagement and consultation, which would result in additional delays in the delivery timeline. Airport funding would also lead to differing standards of consultation material, with some airports able to afford and deliver a more comprehensive set of materials. The UK Airspace Design Charge should be used to fund the airports’ engagement and consultation, under direction and approval from UKADS, which would be the simplest way to de-risk the funding and delivery of a critical part of the airspace change process. The allocation of a limited fund between different bids will involve policy judgements about their respective merits, their alignment with AMS priorities, and the degree of financial support each bid merits. NATS therefore believes it would be more appropriate for the CAA to administer the UK Airspace Design Support Fund as co-sponsors of airspace modernisation and as a public body with some experience of allocating public funds.” [response from NATS]

Quote

“This work was previously conducted by the CAA and paid for out of the enroute charge. It then was handed to industry and paid for by the airports (sponsors) with fees paid to CAA to assess applications. The CAA maintains a similar level of cost/staffing to regulate this task as it had before to do the task itself. Now we continue with this system and with another in parallel with charges to airspace users for this new service. It is being paid three times over, is inefficient, and has suffered long delays.” [response from London City Airport]

Question 19: Which elements of expenditure on an ACP do you think should be eligible under the UK Airspace Design Support Fund? (free text only)

- 3.85 This question invited free-text responses only. Some responses suggested that the fund should comprehensively address the ACP process, including airspace design, procedure design, environmental assessments, stakeholder engagement and public consultations. They emphasised that no critical component of an ACP should be left unfunded to ensure fairness between airports within the scope of the UKADS and those outside the London TMA region.
- 3.86 Some respondents suggested that the fund should focus on the more cost-intensive items, clarifying that some operational costs, such as safety assurance and implementation costs (including engineering and training) should remain outside the scope, as these are expenses that are directly tied to airport and air navigation service provider obligations.
- 3.87 A recurring theme was the need for the fund to support meaningful community engagement. Several respondents explicitly called for consultation, which can be a significant cost, to be covered by the fund, highlighting how effective engagement is integral to the success of any ACP. There were also calls for funding comprehensive environmental assessments of noise and emissions impact to maintain public trust, especially for airports with greater resources.

Quote

“...[it] should cover expenditure related to developing the design work of the airspace change required as well as communicating any changes and the benefits associated with airspace change more widely.” [response from easyJet]

Quote

“[It] should be used to cover the following costs. Such as:

- Airspace Design and Engineering: Costs associated with developing and refining airspace designs by APDOs, including technical studies, simulations and modelling.
- Environmental Impact Assessments: Costs related to assessing the environmental impacts of proposed airspace changes, such as noise and emissions.
- Stakeholder Engagement: Costs associated with consulting with stakeholders.
- Regulatory Costs: Costs associated with obtaining the required approvals [...]

[response from a consultancy]

Quote

“...support to airports comparable to the cost of the services provided by UKADS1 so as to provide equivalence and avoid competitive distortions between airports dependent on their position in or out of the UKADS-led programme. In practice, given the broad scope envisaged for UKADS1 in the consultation, this would suggest that all costs related to progressing an ACP would be covered by the Design Support Fund.” [response from Airspace Change Organising Group]

Quote

“The fund could be most effective by addressing the most onerous, cost-intensive elements of ACPs, such as community consultation in urban areas, or where broader (clearly defined) sustainable benefits can be demonstrated – including significant reductions in emissions and noise.” [response from a new or rapidly developing airspace user]

Funding for the UKADS and proposed UK Airspace Design Support Fund – outcome:

- Subject to the licence modification process, we will create a new UK Airspace Design Charge, paid by airspace users, which will be used to:
 - meet the efficient costs of NERL to provide an airspace design service, and
 - capitalise a new UK Airspace Design Support Fund, which we anticipate being administered by NERL, to cover relevant costs of the sponsors of eligible UK airport ACPs that are outside the scope of the UKADS (see Policy Paper [UKADS 25/3](#) for further information).
- The statutory processes for this include further detailed consultation with those potentially affected by the new charge, including on the level of the charge and how this has been determined, reflecting additional research on anticipated costs in light of a general consensus that the £10m–£20m per annum estimate was too low.
- When the scope of the UKADS evolves, we will consider whether and how the UK Airspace Design Support Fund and associated charging mechanism might be adapted in support of the objectives of the AMS.

Question 20: Second-phase UKADS

Question 20: Do you have any views on our proposed concept for UKADS2?

Figure 3.18: Responses to question 20

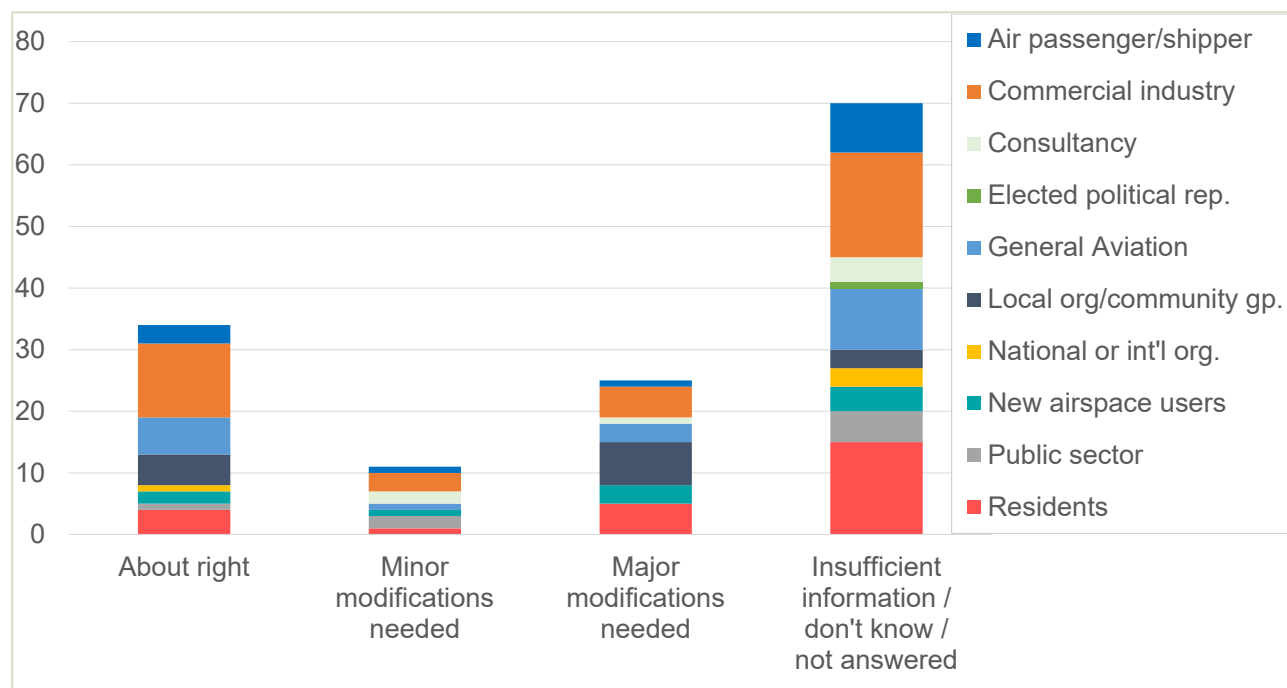


Table 3.18: Responses to question 20

Category	(a) About right	(b) Minor mod's needed	(c) (a) + (b)	(d) Major mod's needed	(e) Don't know/ not answered	(f) Total	(g) (a) total	(h) (a) + (b) total
Air passenger/shipper	3	1	4	1	8	13	23%	31%
Commercial industry	12	3	15	5	17	37	32%	41%
Consultancy	0	2	2	1	4	7	0%	29%
Elected political rep.	0	0	0	0	1	1	0%	0%
General Aviation	6	1	7	3	10	20	30%	35%
Local org/community	5	0	5	7	3	15	33%	33%
National/int'l organisation	1	0	1	0	3	4	25%	25%
New airspace users	2	1	3	3	4	10	20%	30%
Public sector	1	2	3	0	5	8	13%	38%
Residents	4	1	5	5	15	25	16%	20%
Total	34	11	45	25	70	140	24%	32%

3.88 Half of respondents selected 'Insufficient information / Don't know' or skipped the question. 24% of respondents said 'About right' whereas 17% said 'Major modifications needed'.

3.89 This pattern was reflected among most of the stakeholder categories, apart from Local Organisations where 46% said 'Major modifications needed', 30% said

'About right' and a minority suggested there was insufficient information or did not voice an opinion.

- 3.90 The free-text responses highlighted the need for clearer articulation of how the future operating model for the UKADS would evolve from the first phase. Some stakeholders suggested that the implementation of the first phase should be carefully evaluated for effectiveness, independence and impartiality before progressing to a UKADS that would be responsible for all UK ACPs. Creating a centralised monopoly could lead to inefficiencies, bottlenecks, a lack of responsiveness to local needs and reduced flexibility for handling less complex ACPs.
- 3.91 Respondents also expressed concerns about the potential for delays in implementing the extended scope UKADS, particularly given the need for primary legislation. They noted that the lack of a clear, concrete timeline could lead to further stagnation in airspace modernisation efforts, especially outside the London TMA.

Quote

"Once UKADS1 has been implemented and experience of delivery gained, the detailed proposals for UKADS2 will need to be defined in more detail and stakeholders afforded the opportunity to comment further." [response from Manchester Airports Group]

Quote

"The promise of UKADS2 being created at some point in the future, with a funding stream that does not rely on airports, creates an incentive for further airspace modernisation delay. We recommend that a timetable for the creation of UKADS2 is created, while accepting UKADS2 will need primary legislation." [response from Bristol Airport]

Quote

"The concept of UKADS1 and UKADS2 is a strategic approach to airspace modernisation. UKADS2 represents a long-term vision for a more integrated and efficient airspace design system; however, it appears to be based on what will be left after the focus has switched from UKADS1 and the planning does not appear to focus on airspace modernisation of the UK, just the LTMA." [response from a consultancy]

Quote

"A clear transition plan from UKADS1 to UKADS2 is critical to avoid disruptions and ensure continuity in airspace modernization efforts." [response from an airline]

Quote

“...we do not agree that establishing the proposed end-state single airspace design entity for UKADS2, which the CAA noted would encompass ACPs from both UAS and conventional aircraft stakeholders, can achieve this [modernisation] aim for the whole of the aviation industry. UKADS2, which the CAA currently believes would oversee all ACPs impacting both UAS and conventional aircraft carrying large cargo and passengers over long distances, takes a broad approach that will struggle to accommodate the diversity of needs and use cases unique to the UAS industry. Unoccupied UAS operations do not pose the same risks as conventional aircraft transporting people or large cargo and should have a separate streamlined process to facilitate deployment of these operations. This is especially pertinent since we anticipate that BVLOS UAS operators will depend less and less on ACPs over the next few years, particularly in low-level airspace. [...] we expect that operational experience in the next few years will demonstrate that UAS can be seamlessly integrated with minimal to no impact on the airspace as they are technologically able to detect and avoid crewed aircraft without having to rely on TRAs or TMZs. [...] As a general rule, Wing believes that UAS operators ultimately would not have to obtain ACPs for most types of operations.”
[response from Wing Aviation UK]

Quote

“Needs to be sped up to allow BVLOS drones without the need for TDA's etc. Especially over Class G Open Airspace.” [response from Skynique]

Second-phase UKADS – outcome:

- In parallel with tasking NERL with the UKADS, we will consider developing detailed proposals for an extended-scope UKADS that could have responsibility for sponsoring all airspace change in the UK. As indicated in the consultation, primary legislation would likely be required to facilitate this, and we will consider seeking such powers.
- No decisions have been made yet on the detailed form of this extended-scope UKADS, including whether it would be a new or existing body. The detail would be subject to further consultation in the future.
- Implementation of this model would be subject to the DfT and CAA reviewing the success of UKADS in delivering its objectives in the first phase and ensuring that policy, process or legislation changes would address any unfulfilled objectives.

Question 21: Regulatory Impact Assessment

Question 21: Do you have any other comments about the proposals in this consultation document or about the accompanying Regulatory Impact Assessment? Is there anything we have missed?

- 3.92 This question invited free-text responses only. Several respondents questioned whether the RIA provided sufficiently robust cost-benefit analysis, suggesting that costs could be underestimated or efficiency gains overestimated. Related to this, some felt that the RIA did not sufficiently account for impacts on certain stakeholder categories, nor did it sufficiently consider implementation risks.
- 3.93 While less prevalent, some feedback focused on the RIA's treatment of environmental factors. Respondents suggested that the RIA should place stronger emphasis on how carbon reduction and noise mitigation benefits will be achieved, ensuring that these are integral to the evaluation of the long-term value of the UKADS.

Quote

“...the scope to reduce carbon in terminal airspace is significantly overstated as is evidenced by the IA and as explained below. Apart from carbon, environmental issues such as noise and air quality are largely ignored. It is said that airspace modernisation is needed to increase capacity to facilitate growth and to improve resilience and punctuality and reduce delays and safety is paramount. Also, it is said emerging technology such as PBN needs to be introduced, not least to save time, cost and involvement of air-traffic controllers. But these topics are hardly addressed at all and should be. The outcomes need to be evaluated and included in the UKADS IA .” [response from Richmond Heathrow Campaign]

Quote

“...benefits realisation will be at the core of many decisions under UKADS1 and between ACOG and UKADS1. The methodology for calculating benefits should be consulted upon with airports, agreed and defined, and it should align with the overall rationale for Airspace Modernisation and the wider strategic imperatives of the Government and the CAA (where appropriate). They should include not only the number of citizens, travellers and flights affected by the relevant changes, for example through changes to noise levels; but also wider economic considerations, such as the volume of UK trade impacted, and sustainability considerations, such as the volume of carbon removed by improving flight paths. Transparency of methodology and a clear process for resolving disagreement around benefits calculations will be invaluable to command the support of affected sectors.” [response from Heathrow Airport]

Quote

1) The Regulatory Impact Assessment (RIA) does not account for the effects on other businesses or include rigorous cost-benefit analysis. At paragraph 9.3 it inadequately addresses the risk of consultancies losing staff to the UKADS. Staff shortages may impair international competitiveness.

2) The assessment fails to account for the financial effects on consultancies, including reduced asset values, frustrated contracts, and compensation for lost revenue.

[response from a consultancy]

Quote

“LJLA does not own airspace; we only operate the procedures, which are publicly available. The airspace holds no capital value, yet we are expected to invest substantial amounts into it with no financial return. As an independent regional airport, LJLA lacks the influence and resources of larger airport groups, and we feel disadvantaged by a larger competitor's financial and market power, which could be used to undermine any benefit we might gain from the ACP process. [...] Two major modifications to the delivery models must be considered in the interests of fair competition and to avoid unequal access to modernised airspace, unfair allocation of resources, discrimination based on region, and market foreclosure for northern airports, contrary to the Enterprise Act 2002 or the Equality Act 2010 – which requires public bodies to consider regional disparities and ensure balanced development across all areas” [response from Liverpool John Lennon Airport]

Quote

“...it is concerning that the impact on UK trade has not been adequately assessed as part of the regulatory impact assessment, and it is unclear how the conclusion that there is no trade impact has been reached.” [response from Association of International Courier and Express Services]

Quote

“From the UKADS Impact Assessment: 66. The proportion of inefficiency that airspace modernisation will be able to abate is subject to significant uncertainty. This statement appears to crystallise my thoughts that additional charges are certain, but benefits are less so and not realistically quantifiable. Perhaps someone could clarify the above statement.” [response from an airline]

Regulatory Impact Assessment – outcome:

- We have updated the Regulatory Impact Assessment to take account of comments we received. Specifically, we have increased cost estimates to account for new evidence since publication of the consultation. Work has also taken place to provide further clarity on the mechanism for recovering these costs from industry.
- The Better Regulation Framework requires DfT to undertake proportionate analysis of the impacts of a proposed provision. In this case, that is the impact of the UKADS, not of airspace modernisation more generally. In some instances, impacts of a relatively small magnitude compared with the aggregate impact have been identified and it would be disproportionate to monetise them. Instead, we have made updates to ensure those impacts are adequately reflected in qualitative terms.
- The updated Regulatory Impact Assessment is being published as [CAP 3106a](#) alongside this document.