

Airspace Modernisation: Consultation on the requirements for the UK Airspace Coordination Service and associated guidance

CAP 3159



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Civil Aviation Authority
Aviation House
Beehive Ring Road
Crawley
West Sussex
RH6 0YR

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Enquiries regarding the content of this publication should be addressed to:

airspace.modernisation@caa.co.uk

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Executive summary

1. In March 2025 the government decided to reform the UK's approach to modernising the design of UK airspace by introducing a UK Airspace Design Service (UKADS) provided by NATS (En Route) plc (NERL). The government also confirmed that NERL would continue to provide a coordination service for those strategically important interdependent airspace change proposals that are outside the scope of the UKADS (but that those airspace change proposals would continue to be sponsored by their existing change sponsor).
2. In September 2025 the CAA 'signposted' stakeholders of airspace modernisation to changes that are planned, or to be consulted on, in autumn 2025.¹ This explains proposed future models for developing airspace change proposals and associated consultations. We encourage stakeholders to read this explainer document and to respond to the associated consultations as well.
3. **This consultation is seeking views on the new coordination service provided by NERL outside the scope of UKADS** (in place of the service currently provided by NERL through the Airspace Change Organising Group ("ACOG")); We are calling this role the **UK Airspace Coordination service (UKACS)**.
4. We are consulting separately on guidance with which NERL should comply when providing both this proposed new UKACS and the proposed new UKADS.²
5. There are three main drivers for change which have influenced the need to review the requirements and processes associated with UKACS:
 - the proposal to introduce the UKADS
 - our experience of working with the masterplan requirement³

¹ CAP 3156 – Modernising the way we do airspace design: information relevant to the CAA autumn 2025 consultations concerning airspace design www.caa.co.uk/cap3156

² CAP 3158 Consultation on draft guidance for the UK Airspace Design and Coordination Services www.caa.co.uk/CAP3158

³ CAP 2156a - Airspace change masterplan - CAA acceptance criteria www.caa.co.uk/cap2156a

- the CAA's commitment to the Prime Minister to improve the effectiveness and proportionality of our airspace change processes in the context of the government's growth agenda – informed by the evidence from a lessons-learned review.
6. Our proposals make a contribution to improving proportionality and are intended to remove unnecessary delay to airspace change proposals and reduce duplication and confusion for stakeholders. The approach adopted in putting together the proposals is aligned with our duties under the Transport Act 2000 and ultimately intend to deliver modernised airspace in the UK.
7. In summary we propose to add a new condition to NERL's Licence that it provides a UKACS.⁴ The CAA has had no relevant stakeholder responses to the initial proposals to modify NERL's Licence which may have influenced the detailed requirements and associated guidance for the UKACS.
8. We are proposing replacing CAP 2156a/b with new requirements and guidance (see a proposed draft in Appendix A) setting out the services included in the UKACS. This would implement a new set of UKACS requirements on NERL, which would:
- end the current requirement for a masterplan and associated procedures
 - introduce an agile airspace change monitoring requirement
 - continue to require the production of a cumulative assessment and the outputs of a safety strategy
 - make the decision-making process clearer for stakeholders and sponsors by aligning the timing of these value-adding outputs with the CAA's airspace change process decisions.

⁴ See CAP 3121 Economic Regulation of NERL: Initial Proposals for modifying the Licence to support the implementation of a UK Airspace Design Service www.caa.co.uk/cap3121. The CAA intends to issue its Final Proposals in relation to the proposed modifications to NERL's Licence shortly.

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Consultation questions

Chapter 3 – Lessons Learned

Consultation question 1: Do you agree with the lessons learned?

- ☐ about right
- ☐ minor modifications needed
- ☐ major modifications needed
- ☐ don't know

Please explain your answer.

Chapter 4 – Our Proposals

Consultation question 2: Do you agree with our proposals?

- ☐ about right
- ☐ minor modifications needed
- ☐ major modifications needed
- ☐ don't know

Please explain your answer.

Appendix A - Draft UK Airspace Coordination Service requirements

Consultation question 3: Do you agree with the draft UKACS requirements and guidance?

- ☐ about right
- ☐ minor modifications needed
- ☐ major modifications needed
- ☐ don't know

Please explain your answer.

CHAPTER 1

Introduction

The purpose of this consultation

- 1.1 In March 2025 the government decided to reform the UK's approach to modernising the design of UK airspace by introducing a UK Airspace Design Service (UKADS) provided by NATS (En Route) plc (NERL).
- 1.2 In September 2025 the CAA 'signposted' stakeholders of airspace modernisation to changes that are planned, or to be consulted on, in autumn 2025.⁵ This explained the proposed future models for developing airspace change proposals and associated consultations. We encourage stakeholders to read this explainer document and to respond to the associated consultations as well.
- 1.3 **This consultation is seeking views on the new coordination service provided by NERL outside the scope of UKADS** (in place of the service currently provided by NERL through the Airspace Change Organising Group ("ACOG"); **We are calling this role the UK Airspace Coordination Service (UKACS).**
- 1.4 The proposals contained in this consultation will not come into effect unless and until NERL's Licence is modified to require NERL to provide UKADS and UKACS.

Reasons for the proposals in this consultation

The impact of UKADS on the ACOG's coordination role

- 1.5 On 6 June 2025 the government announced that NERL, as the UKADS provider, would 'hold the pen' on airspace change proposals in relation to certain delivery areas (Relevant Areas), subject to the statutory process to modify its air traffic services licence granted under the Transport Act 2000 (Licence).
- 1.6 The UKADS policy paper 25-4: Future of ACOG⁶ set out the proposals that the impartial unit currently known as the ACOG would no longer be required, but that NERL should continue to provide a residual coordination role. It is proposed that NERL would provide the coordination service for clusters of strategically important⁷ interdependent airspace change proposals outside the area(s) where

⁵ CAP 3156 – Modernising the way we do airspace design: information relevant to the CAA autumn 2025 consultations concerning airspace design www.caa.co.uk/cap3156

⁶ [UKADS policy paper 25-4: Future of ACOG](#)

⁷ The CAA's proposed definition of 'strategically important' is contained in Appendix A

the UKADS is being provided (but that those airspace change proposals would continue to be sponsored by their existing change sponsors).

Our experience of the masterplan requirement

- 1.7 The current masterplan requirement has evolved since it was introduced because unlike the original intention, masterplans have not been driving the development of constituent airspace change proposals; rather masterplans are representing how interdependent airspace change proposals have been developed and coordinated (including the trade-off decisions that had been made so that the individual airspace change proposals work together).
- 1.8 The CAA has had to adapt the current process as a result, and this is set out in more detail in Chapter 2.

Improving the effectiveness and proportionality of our regulation

- 1.9 From a broader perspective, improving regulation in the UK is an essential part of the government's growth mission.⁸ To support this mission, the CAA has committed to consult on improvements to the effectiveness and proportionality of our process for changing airspace to accelerate and enhance the changes that are vital to achieving airspace modernisation.⁹
- 1.10 The CAA has undertaken a lessons-learned review of the current requirements and process, taking into account that the masterplan has evolved since the ACOG was established.

Structure of this consultation document

- 1.11 Below we give a brief summary of the reasons why we are consulting and what we are proposing. At this stage no decisions have been made, and these are proposals for consultation. More detail appears in the subsequent chapters as follows:
- the evolution of the airspace change masterplan (Chapter 2)
 - a lessons-learned review (Chapter 3)
 - our proposals (Chapter 4)
 - a summary of the proposals and consequential documentation changes if adopted (Chapter 5)
 - a draft set of requirements and guidance for the new UKACS (Appendix A).

⁸ CAP 3085 – Letter from Prime Minister to the CAA www.caa.co.uk/cap3085

⁹ CAP 3085A – CAA's response to the Prime Minister www.caa.co.uk/cap3085A

What is not in scope of this consultation

- 1.12 We are not seeking views on any of the following:
- specific airspace change proposals, past or present
 - views on technical or operational concepts about how aircraft will fly or other aspects of airspace design; whether potential designs are technically feasible will be a regulatory decision to be made in accordance with the CAP 1616 process
 - the CAA's CAP 1616 airspace change process which is subject to a separate consultation by the CAA¹⁰
 - government policy and any guidance given to the CAA by the Secretary of State.
- 1.13 Consequently, the CAA will only take into account elements of responses to this consultation that are within scope.

Who is this consultation for?

- 1.14 This consultation is for stakeholders with an interest in airspace change proposals that are currently in scope of the airspace change masterplan.¹¹ This includes sponsors of relevant airspace changes (airports and air navigation service providers), as well as those affected by the airspace change proposals.
- 1.15 We have tried to keep technical terminology to a minimum as we appreciate that we have a wide range of stakeholders who will have an interest in the proposals.

How to respond to this consultation

- 1.16 Please let us have your comments by answering the questions on the CAA's consultation website <https://consultations.caa.co.uk/policy-development/draft-ukacs-requirements>. The questions include some multiple-choice answers and the opportunity to submit your comments by completing text boxes. Our strong preference is that you complete the online consultation. We understand that some stakeholders prefer not to be constrained by the questions alone and will want to send a self-contained response. While we will take account of these submissions, we ask that you arrange the submission using the subject headings of the consultation document. This is because we will not be able to analyse them in the same way that we analyse the online responses.

¹⁰ [Consultation on the airspace change process - Civil Aviation Authority - Citizen Space](#)

¹¹ The scope of the masterplan can be found on the CAA website [here](#).

- 1.17 The consultation will close at 23:59 on 12 January 2026 (a consultation period of eight weeks). We cannot commit to taking into account comments received after this date.
- 1.18 We will assume that all responses can be published on the CAA website. When you complete the online consultation there will be an option for you to hide your identity or refuse publication (in any event, your email address will not be published). In the interests of transparency, we hope you will not refuse publication. If you do send us a separate submission and it includes any material that you do not want us to publish, please also send us a redacted version that we can publish.
- 1.19 Our starting point will be that we expect to publish any response in its entirety. We will use moderation in order to remove any unsuitable content, but not as a general means of censoring or filtering responses. Please see the consultation website for more information on our moderation policy.
- 1.20 Please note that your response will be shared with relevant employees of any consultancy firms that we may contract to assist with the consultation.
- 1.21 You should be aware that information sent to, and therefore held by us, is subject to legislation that may require us to disclose it, even if you have asked us not to (such as the Freedom of Information Act and Environmental Information Regulations).¹² Therefore, if you do decide to send information to us but ask that this be withheld from publication via redacted material, please explain why, as this will help us to consider our obligations to disclose or withhold this information should the need arise.

Next steps

- 1.22 Once the consultation has ended, we will publish a consultation response summarising the responses we received and how we have taken these into account. We will then also publish any outcomes and begin to update relevant documentation that requires consequential change (see Chapter 5 for further details).

¹² <https://www.caa.co.uk/our-work/about-us/general-privacy-notice/>

CHAPTER 2

The evolution of the airspace change masterplan

Masterplan commission and acceptance criteria

- 2.1 In 2018, a new initiative was implemented. The DfT and CAA commissioned NERL to set up the ACOG to produce an airspace change “masterplan” (that is, a single coordinated implementation plan for airspace changes in the UK up to 2040).¹³ The CAA set out these requirements in NERL’s Licence.¹⁴
- 2.2 Following an engagement exercise¹⁵ the criteria against which the CAA would make the decision whether to accept the airspace change masterplan into the CAA’s Airspace Modernisation Strategy were set out in CAP 2156a Airspace change masterplan – CAA acceptance criteria and CAP 2156b Airspace change masterplan – assessment framework.
- 2.3 The original purpose of the masterplan was to set out a single coordinated implementation plan for airspace changes in the UK up to 2040 to upgrade the UK’s airspace and deliver the objectives of the CAA’s Airspace Modernisation Strategy at a system level. In doing so, the masterplan was intended to:
- identify where and when airspace change proposals need to be developed in coordination to support delivery of the objectives of the airspace modernisation strategy
 - describe how individual airspace change proposals relate to each other (i.e. interdependencies) and where there are potential conflicts in their proposed designs
 - explain how trade-off decisions to resolve those conflicts have been made
 - set out the proposed timelines for implementation of the individual airspace changes
 - demonstrate the anticipated cumulative impact of the airspace change proposals.
- 2.4 The masterplan was not intended to include the design details of the individual airspace change proposals. The masterplan was intended to be accepted into the CAA’s Airspace Modernisation Strategy such that individual airspace change

¹³ The three commissioning letters are reproduced in an appendix to CAP 2156a www.caa.co.uk/cap2156a

¹⁴ Condition 10a [NERL licence and monitoring | UK Civil Aviation Authority](#)

¹⁵ CAP 1887 [Proposed Criteria for Assessing and Accepting the Airspace Change Masterplan - Civil Aviation Authority - Citizen Space](#)

proposals would be made in accordance with it. Airspace change sponsors develop individual airspace change proposals and at the same time, NERL via its unit the ACOG, is required to coordinate their development.

How the masterplan process has evolved

- 2.5 The original commission envisaged that the masterplan would be a UK-wide implementation plan set out in a single document, and updated over a number of iterations as sponsors progressed through the CAP 1616 process and more information became available. However, the masterplan has evolved as follows:
- 2.6 **The UK-wide masterplan has been separated into regional clusters.** This approach was agreed to enable benefits to be delivered earlier, and to help spread the implementation of any approved changes, given there are constraints on what can be implemented safely at any one time while maintaining the existing operational air traffic control service in the UK.
- 2.7 There are currently 18 strategically important airspace change proposals, as defined in the masterplan, which have been divided into four geographical 'clusters': London, Scottish, Manchester and West. Each cluster contains at least one NERL airspace change proposal necessary to connect the design facilitating the airport to the design of the upper airspace network.

Figure 2.1 Clusters of the current airspace change masterplan



- 2.8 **The airspace change proposals that form each cluster have changed over time.**¹⁶ This has been due to events such as:
- sponsors unable to fund or resource an airspace change proposal, leading to the airport seeking to exit the masterplan process
 - airspace change proposals no longer needing coordination as the scope of the design no longer requires interdependencies to be resolved
 - a sponsor initiating a new airspace change proposal that is interdependent with at least one other strategically important airspace change proposal with which it needs to be coordinated.
- 2.9 The West cluster has been reduced from three airports to one. The ACOG has successfully completed coordination work for the two (originally three) airports in the Scottish cluster, developing its approach to coordination and learning many lessons along the way. Experience demonstrates that coordination drives progress and that NERL can usefully continue to add value by providing coordination services.
- 2.10 **The masterplan decision-making timing has changed.** Originally the masterplan was intended to be assessed, accepted into the Airspace Modernisation Strategy and then published before the corresponding CAP 1616 gateway. In June 2024 this was changed because experience demonstrated that any decision on accepting an iteration of a masterplan was intrinsically linked to the relevant gateway decision under CAP 1616.
- 2.11 **The masterplan publication timing has changed.** Originally it was intended that an accepted masterplan would be published when accepted. However, experience demonstrated that publication of any masterplan before publication of the linked airspace change proposal consultations would cause confusion for the public. This was because the masterplan is concerned with areas of trade-offs between interdependent airspace change proposals and does not therefore provide a full picture of the proposals. The CAA decided that on balance publication of the masterplan before publication of the constituent airspace change proposal consultations was not in the interests of the public who would not have access to all the relevant information or the whole picture.
- 2.12 Our website contains more information on how the masterplan has evolved.¹⁷

¹⁶ We have previously published the ACOG's advice as and updated our website. See CAP 2321A01: Addendum to CAP 2312A Airspace Change Masterplan Iteration 2: Co-sponsor assessment and CAA acceptance decision www.caa.co.uk/CAP2312A01

¹⁷ [Evolution of the masterplan | Civil Aviation Authority](#)

CHAPTER 3

Lessons learned

- 3.1 In line with our commitment to the Prime Minister that we would consult on improvements to the effectiveness and proportionality of our airspace change processes, the CAA has undertaken a review of the current process set out in CAP 2156a/b, which also took into account that the masterplan has evolved (see Chapter 2).
- 3.2 CAA's review reflects feedback from the ACOG and from sponsors of relevant airspace change proposals in the different regional clusters. Our review identified the following themes.

Key themes

- 3.3 **Identifying where, when and why airspace change proposals are needed relies on industry.** The ACOG is currently required to identify where, when and why airspace change proposals are needed in a masterplan document. However, the ACOG does not manage airspace or relationships with local stakeholders and so currently relies on industry feedback and also uses a Public Engagement Exercise (PEX) prior to the submission of Iteration 3 of the masterplan to seek feedback. There were no suggestions regarding the need for additional strategically important airspace change proposals during the two regional masterplan PEXs held in 2024. Our experience suggests that monitoring which airspace changes need to be coordinated is best done through ongoing industry engagement and not at one fixed point in time. The membership of the clusters has changed as a result of events on an ongoing basis as explained in Chapter 2.
- 3.4 **The PEX timing and content means it has limited value.** The timing of the PEX, before sponsors of constituent airspace change proposals have reached their 'consult' gateway, means that only high-level information on potential trade-offs can be described. Feedback from sponsors has suggested that the PEX has lacked meaningful detail and has caused confusion and frustration for local stakeholders, who are interested in where flight paths may be changing.
- 3.5 As explained further in Chapter 2 above, this detail cannot be included in the PEX as the ACOG are only required to coordinate where there are areas of conflict or trade-offs to be made. The ACOG cannot provide in-depth information on the constituent airspace change proposals which is developed by constituent sponsors later, as part of the CAP 1616 process. Without the proposed flight path detail (which comes later in the sponsors' CAP 1616 public consultations)

stakeholders cannot give informed opinions, reducing the effectiveness of the engagement exercise.

- 3.6 The number of responses to the ACOG PEXs undertaken so far has been low, possibly due to the information not being detailed enough. In the Scottish regional PEX a total of twelve responses were received from a mix of representatives. Key feedback themes included concerns over insufficient engagement, and a lack of detail in the material.¹⁸ Several respondents expressed concern and frustration that flight paths were not shown as part of the materials. For the London Airspace South PEX sixteen responses were received and included feedback concerning the lack of clarity of the engagement information.¹⁹
- 3.7 **The masterplan submission timing causes unnecessary delay to the progress of airspace change proposals.** The masterplan document is currently required to be submitted by the ACOG before sponsors submit materials to the relevant CAP 1616 gateway. In June 2024 we recognised that our decision making was intrinsically linked with CAP 1616 and there could be cases where the masterplan was accepted, but the CAP 1616 gateway reviews uncovered issues that required rework to be undertaken. As a result, there is no need for the ACOG to submit information earlier given we will only make a formal acceptance of the masterplan, at the same time as the relevant CAP 1616 gateway decision.
- 3.8 **Published information becomes out of date quickly.** Changing circumstances mean that some masterplan information, including timelines, risks and commitment levels, can become out of date quickly as sponsors adjust their timelines accordingly. Some of this information is likely to be relevant only to the CAA in overseeing the programme (for example managing risks) and some is also duplicated elsewhere, including on the CAA's airspace change portal.
- 3.9 **The coordination of sponsors and the development of common frameworks has added value.** The ACOG has set up valuable processes in its coordination of interdependent airspace change proposals. Firstly, **a cumulative assessment framework (CAF)** provides a common, unified methodology to demonstrate the anticipated cumulative impact of constituent airspace change proposals in a cluster as well as demonstrate the selection of solutions to conflicts and trade-offs. Secondly, a format for an overarching **Safety Strategy** which sets out the roles and responsibilities for safety assurance and ensures that sponsors develop their safety cases in a coordinated manner.
- 3.10 In summary, key areas where the ACOG has added value are as follows:

¹⁸ [Airspace Change Masterplan \(Iteration 3\) Scotland Public Engagement Exercise](#)

¹⁹ [Airspace Change Masterplan \(Iteration 3\) LAS Public Engagement Exercise](#)

- encouraging collaboration/mediating between sponsors
- developing/agreeing/monitoring detailed programmes for sponsors to work towards
- coordinating CAP 1616 gateway bookings for the constituent airspace change proposals (who need to proceed through the CAP 1616 process at the same pace)
- reporting progress and risks
- providing advice to the CAA and DfT on airspace change proposals that are strategically important and whether they are interdependent with at least one other airspace change proposal (known as monitoring)
- developing a cumulative assessment framework for airspace change proposals with interdependencies
- developing a safety strategy for sponsors to align their safety assessments.

Conclusion

- 3.11 The lessons learned review has highlighted requirements and processes that add no value, cause delay or duplicate activities unnecessarily. At the same time there are key areas where the ACOG has added value, and the CAA considers that it is important that these aspects continue under proposed UKACS coordination arrangements.
- 3.12 Given the review and the other drivers of changes set out above, we consider that the current criteria requiring development of a masterplan and its acceptance into the Airspace Modernisation Strategy are no longer fit for purpose. **We therefore consider there is limited value to stakeholders and the public in maintaining the current criteria set out in CAP 2156a. We consider we have an opportunity now to replace CAP 2156a with requirements that will enable delivery of modernised airspace in the UK and at the same time reduce regulatory burden and duplication.**
- 3.13 The next chapter sets out our proposal for new UKACS requirements.

Consultation question 1: Do you agree with the lessons learned?

- ☐ about right
- ☐ minor modifications needed
- ☐ major modifications needed
- ☐ don't know

Please explain your answer.

CHAPTER 4

Our proposals

Introduction

- 4.1 Following the lessons learned review set out in Chapter 3, this chapter sets out four proposals to revise the process currently carried out by the ACOG. We are proposing to remove CAP 2156a/b entirely and replace with new UKACS requirements. However, for the purpose of this chapter we have described our proposals by comparison and with reference to the current requirements set out in CAP 2156a/b.
- 4.2 The four proposals are informed by the lessons learned review and aim to retain the value added by coordination and common frameworks, while removing duplication and unnecessary steps.
- Proposal 1 removes the requirement for a masterplan and associated procedures such as the PEX to address the confusion caused (before public consultations are held) because the masterplan and PEX necessarily lack the detail sought by stakeholders.
 - Proposal 2 introduces a more agile monitoring requirement on NERL, responding to the current limitations around identifying relevant strategically important interdependent airspace change proposals, which can change over time,
 - Proposal 3 removes the requirement for an implementation plan (an aspect of a masterplan) to reduce duplication and avoid publishing information that quickly becomes outdated.
 - Proposal 4 requires NERL to continue to be responsible for a cumulative assessment and safety strategy outputs to be submitted to the CAA at the same time as the CAP 1616 requirements of the constituent airspace change proposals, thereby reducing unnecessary delay.
- 4.3 The approach adopted in putting together the proposals is aligned with our primary duty in the Transport Act 2000 to maintain a high standard of safety in the provision of air traffic services. These proposals should also further the interests of customers and consumers through supporting the delivery of the Airspace Modernisation Strategy, while promoting economy and efficiency through the removal of duplication, regulatory burden and unnecessary steps (such as requirements relating to the ACOG, the masterplan and associated processes) and through the requirement to continue activities which add value (such as the requirements relating to the cumulative assessment and safety strategy outputs).

Proposal 1 - Remove the requirement to prepare a masterplan and the associated public engagement exercise

- 4.4 Current NERL Licence condition 10a requires the ACOG to prepare a masterplan. Chapter 5 of CAP 2156a contains the criteria for content of the masterplan. Criterion B7 of CAP 2156a currently requires the ACOG to run a PEX prior to the submission of Iteration 3 of the masterplan to the CAA and DfT. Through this engagement, the ACOG should make stakeholders aware of the CAP 1616 consultations on airspace change proposals, how they are linked together, and how stakeholders can feed back on trade-off decisions that might affect them.
- 4.5 In practice, the overall masterplan has not contributed to the aim of achieving airspace modernisation. Additionally, the timing of the PEX (and the limited amount of detail that the ACOG is able to include at that point in the process) has caused confusion and frustration for some stakeholders. This is because the ACOG's role (and the masterplan) intentionally focuses on the areas of interaction between interdependent airspace change proposals and not the entire detailed design of each proposal.
- 4.6 Removing the PEX will not remove the opportunity for the public to review and comment on proposals being developed. The public will have an opportunity to consider and respond to the proposed designs by the sponsor of the constituent airspace change proposal during their public consultation exercises required under the CAP 1616 which will include details of any trade-offs made to resolve conflicts between interdependent airspace change proposals in a cluster which will have affected the design selected by an airspace change sponsor for consultation.
- 4.7 In summary, given the timing of the PEX, the limited amount of detail possible at that point in the process, and the fact that there are later sponsor-led public consultations covering the wider geographical scope of the airspace change proposals, **we propose to remove completely the requirement to produce a masterplan and undertake a PEX (Criterion B7 in CAP 2156a).**

Proposal 2 – Agile monitoring of airspace changes

- 4.8 The original nine 'A' criteria in CAP 2156a required the ACOG to analyse and set out in a masterplan document where, when and why strategically important airspace changes might be developed or needed, for example to accommodate growth or deliver safety or environmental benefits (and whether they are interdependent with any other airspace change and require coordination).
- 4.9 The ACOG needs information from industry to analyse and assess this as it does not manage airspace or have relationships with local stakeholders. The PEXs of

masterplans undertaken so far have not resulted in suggestions or changes to the number or scope of the masterplan clusters.

- 4.10 We have seen that circumstances can and do change over time. As sponsors refine the options in their airspace change proposals, the nature of these interdependencies can change, which can mean that some airspace changes are no longer interdependent with at least one other airspace change and therefore do not require coordination. We consider that an agile approach is more suited to changing circumstances than a fixed analysis at a single point in time as the current criteria require.
- 4.11 **We therefore propose that the current ‘A’ masterplan criteria contained in CAP 2156a are replaced with a requirement to monitor current, and for potential, strategically important airspace change proposals and provide advice to the CAA and DfT as necessary.** As set out in the associated consultation concerning guidance with which NERL should comply when providing both the proposed UKACS and the proposed UKADS,²⁰ it is proposed that NERL is required to seek advice from an Advisory Board in order to comply with this requirement.
- 4.12 The CAA would publish relevant decisions regarding which airspace change proposals are in scope requiring coordination by NERL within a cluster. **Individual airspace change proposals included in scope and requiring co-ordination by the UKACS would not be able to progress through a gateway or a decision on their own, outside or ahead of their relevant airspace change cluster timeline.**
- 4.13 **We also propose that NERL be required to monitor when relevant sponsors are not sufficiently progressing their airspace change proposals in accordance with the coordinated timetable for the cluster. We propose that NERL provide that information to the DfT and the CAA in order that regulatory interventions, for example the use of powers under the Air Traffic Management and Unmanned Aircraft Act 2021, can be considered.**

Proposal 3 - Remove requirement for an implementation plan

- 4.14 The current ‘B’ criteria in CAP 2156a require the ACOG to develop, and include in each masterplan iteration, a credible and implementable plan, including reporting of timelines, risks and commitment levels.
- 4.15 This information can only ever be a snapshot at the time the document is produced. It can quickly become out of date, potentially causing confusion for stakeholders. The CAA’s Airspace Change Portal, accessible by anyone, sets

²⁰ CAP 3158 Consultation on draft guidance for the UK Airspace Design and Coordination Services
www.caa.co.uk/CAP3158

out the most up-to-date timeline information for each of the airspace change proposals that are subject to coordination, superseding the equivalent information in the latest iteration of the masterplan.

- 4.16 In addition, the implementation plan is currently used by DfT and CAA to oversee delivery by NERL of ACOG and the masterplan requirements. The ACOG is currently required to report implementation plan timeline and risk information to the CAA airspace modernisation oversight team. The oversight team is then responsible for monitoring and raising risks through the airspace modernisation governance structure to the CAA and DfT, and reporting a summary annually to the Secretary of State.²¹
- 4.17 In the proposed modification to NERL's Licence we are proposing that NERL produce a strategic delivery plan which includes plans to deliver airspace changes in an area it is required to provide UKADS and the plans for delivery of any airspace change it is required to coordinate as part of UKACS. In our associated consultation (CAP 3158) we propose that the existing DfT/CAA governance structure be revised to enable governance of NERL's provision of the UKADS and UKACS.
- 4.18 In summary, we consider that the requirement to set out this information in a published masterplan is unnecessary. **We therefore propose to remove the 'B' criteria (B1a, B1b and B1c of CAP 2156a) requiring the inclusion of timelines, assumptions, risks and commitment levels in a published document.** These assumptions and risks should also include any relevant information regarding the identification of any novel operational concepts and their maturity, **and we therefore also propose to remove criterion B11.** The CAA airspace modernisation oversight team will continue to monitor and report on this information.

Proposal 4 - Prepare value adding information alongside CAP 1616 material prepared by sponsors

- 4.19 CAP 2156a/b required the ACOG to develop a masterplan that identified combined impacts and demonstrated that individual proposals could combine safely together and work as a whole system. The ACOG devised a cumulative assessment framework and a safety strategy for sponsors of interdependent airspace change proposals to follow. These provide a common, unified methodology to consider and resolve conflicts and trade-offs between interdependent airspace change proposals, and for setting out the various safety responsibilities.

²¹ Air Navigation Directions 2023 Direction 3(g) <https://www.caa.co.uk/media/lzrl3drs/caa-air-navigation-directions-2023.pdf>

- 4.20 The cumulative assessment covers the existing Criteria B3–B6 and B9. The outputs of the safety strategy cover Criterion B10. Although we propose NERL will still be required to prepare this information as part of its proposed UKACS, these outputs would no longer be required in advance of a sponsor's 'consult' gateway or final submission (as applicable), and it is proposed would be required to be delivered at the same time.
- 4.21 **We propose to remove the requirement to produce a masterplan. Instead, the cumulative assessment outputs should be delivered by NERL as part of its UKACS alongside the sponsors CAP 1616 'consult' gateway material. Following sponsor consultations, final versions of the cumulative assessment outputs and the safety strategy should be delivered by NERL as part of its UKACS, when sponsors submit their final proposals for a decision under CAP1616.**
- 4.22 Current CAP 2156a criterion B8 (a plan for the content of subsequent iterations of the masterplan) and B12 (accessibility of publications) would also become redundant, as they relate to the style and content of subsequent iterations of the masterplan, which would no longer be required.

Environmental assessments

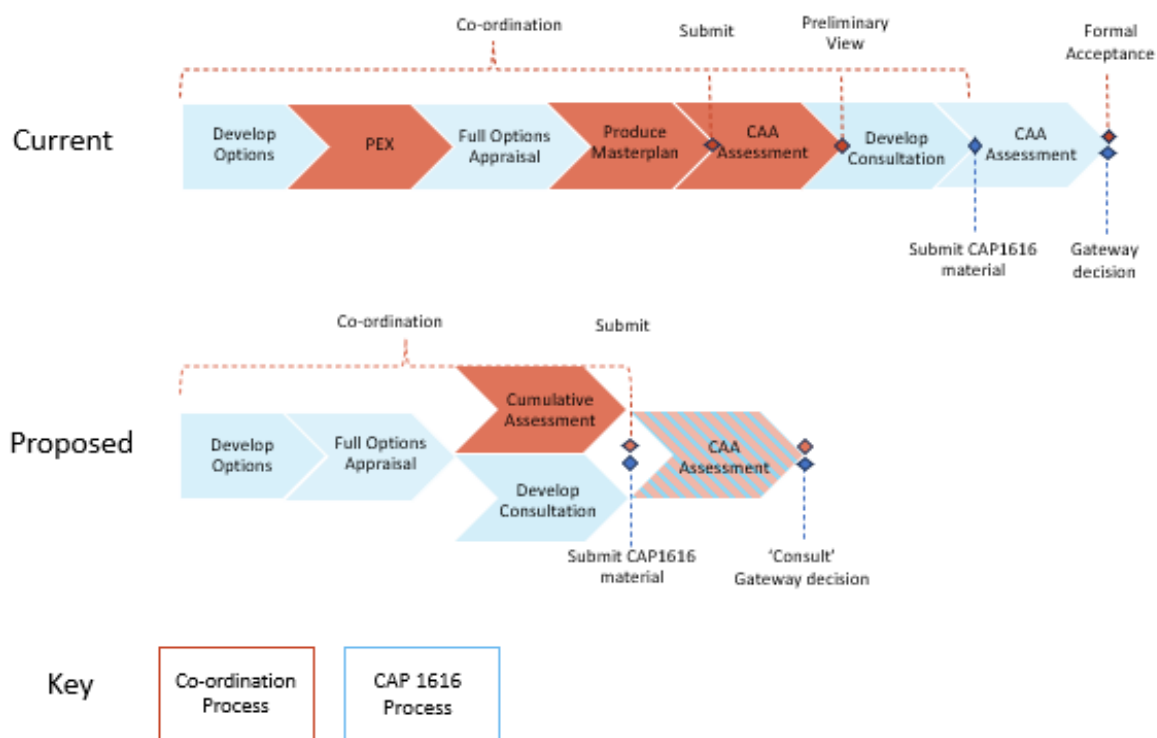
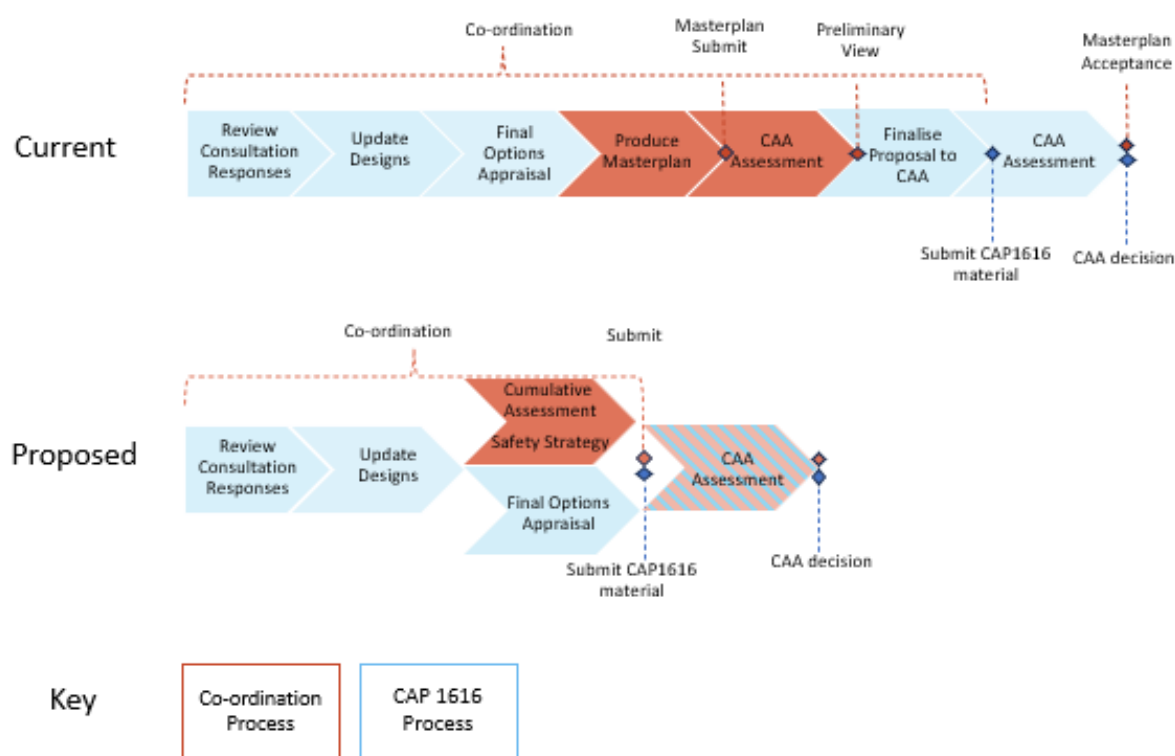
- 4.23 The current requirement to produce a masterplan constitutes a plan under the SEA regulations²² which required a specific environmental assessment. Because neither a cumulative assessment framework nor a safety strategy constitutes a plan, this will no longer be required. This means that CAP 2156a criterion B2 would no longer be required.
- 4.24 However, each individual airspace change proposal will continue to assess the impact of the airspace change on habitats under the relevant habitat assessment regulations²³ and this requirement will continue to be reflected in the CAA's CAP 1616 process.

Overall proposal process

- 4.25 The following diagrams illustrate how the proposed process (as set out in the proposals above) compares with the existing approach for progressing clusters through CAP 1616 – at both CAP 1616 'consult' and 'decision' stages. They illustrate how key steps have been streamlined or removed to reduce duplication and better align with the CAP 1616 process.

²² Environmental Assessment of Plans and Regulations 2004 ("SEA Regulations")

²³ The Conservation of Species and Habitats Regulations 2017 ("Habitats Regulations")

Figure 4.1 – Current vs proposed coordination process at CAP 1616 ‘consult’ stage**Figure 4.2 – Current vs proposed coordination process at CAP 1616 ‘decision’ stage**

Consultation question 2: Do you agree with our proposals?

- ☐ about right
- ☐ minor modifications needed
- ☐ major modifications needed
- ☐ don't know

Please explain your answer.

CHAPTER 5

Summary of proposals and consequential changes

- 5.1 This chapter summarises the proposals and how these are translated into a new set of requirements and guidance for NERL as the UKACS provider. These resulting requirements and guidance are included in Appendix A and would complement the associated NERL Licence modification consultation proposals.²⁴
- 5.2 The CAA has had no relevant stakeholder responses to the initial proposals to modify NERL's licence which may have influenced the detailed requirements and associated guidance for the UKACS.
- 5.3 It is proposed that all clusters that are subject to coordination by the UKACS would transition to this new simplified process immediately once published in final form. CAP 2156a and b would be withdrawn as a result.
- 5.4 Below we also set out a number of likely consequential documentation changes should the proposals be adopted.

Summary of proposed changes

- 5.5 Proposal 1 – There would no longer be a requirement to produce a masterplan. The CAA proposes to remove CAP 2156a Criterion B7 which requires a stakeholder engagement exercise to be undertaken ahead of the public consultation required by CAP 1616, as this causes unnecessary confusion and frustration for local stakeholders.
- 5.6 Proposal 2 - The CAA proposes to replace all current CAP 2156a 'A' Criteria, which requires the ACOG to analyse and set out in a masterplan document where, when and why airspace changes might be developed or needed, by a more agile monitoring and advice requirement in a new draft **Requirement 1**.
- 5.7 Proposal 3 – The CAA proposes to remove CAP 2156a Criteria B1a, B1b, B1c and B11, which cover the reporting of timelines, risks and commitment levels. It is proposed NERL will be required to produce a Strategic Delivery Plan and this will be monitored, by requiring information is provided to, the CAA airspace modernisation oversight team.
- 5.8 Proposal 4 – The CAA proposes to retain CAP 2156a Criteria B3 to B6 and B9 by draft **Requirements 2 and 3** which requires the cumulative assessment to be

²⁴ See CAP 3121 Economic Regulation of NERL: Initial Proposals for modifying the Licence to support the implementation of a UK Airspace Design Service www.caa.co.uk/cap3121. The CAA intends to issue its Final Proposals in relation to the proposed modifications to NERL's Licence shortly.

provided alongside the relevant sponsor CAP 1616 material. There would no longer be a requirement to produce a masterplan, and so the step requiring the plan to be accepted into the CAA's Airspace Modernisation Strategy would fall away. As it is proposed there will be no plan, no environmental assessments of the impact on habitats or protected sites of a plan will be needed so criteria B2 will no longer be required. However, the requirement to consider the impact of each airspace change in a cluster on habitats is not affected and will continue to be reflected in the CAA's airspace change process, CAP 1616.

- 5.9 The CAA proposes to retain CAP 2156a criterion B10 by draft **Requirement 4** requiring the safety strategy outputs to be delivered when sponsors their final proposals under CAP 1616.
- 5.10 The CAA proposes to remove CAP 2156a criteria B8 and B12 because there would no longer be a requirement to produce a masterplan.

Consequential document changes

- 5.11 If our proposals are implemented, and subject to the statutory process to modify NERL's Licence set out in the Transport Act 2000, then the following documentation (which need to be read and considered together) would be published:
- CAA guidance with which NERL should comply when providing the proposed UKACS and the proposed UKADS (see associated consultation document CAP 3158 Annex A); and
 - A new CAA document setting out the revised requirements and associated guidance with which NERL should comply when providing the proposed UKACS (a draft is contained in Appendix A).
- 5.12 The following CAA documentation would be withdrawn:
- CAP 2156a: Airspace change masterplan – CAA acceptance criteria
 - CAP 2156b: Airspace change masterplan – assessment framework
 - CAP 2157: Outcome of the engagement on proposed criteria for assessing and accepting the airspace change masterplan
 - CAP 1884: Masterplan Iteration 1
 - CAP 2312: Masterplan Iteration 2 and addendum (CAP 2312A01)
 - CAP 2528: Airspace Change Masterplan: Approach to Strategic Environmental Assessment and Habitats Regulations Assessment
 - CAP 2526 Airspace Change Masterplan: Strategic Environmental Assessment Scoping Report

- CAP 2527 Airspace Change Masterplan: Habitats Regulations Screening Report.

5.13 Updates would also be required to the following CAA documents:

- CAP 3042: Airspace Change: Masterplan Trade-off Procedure
- CAP 1711: Airspace Modernisation Strategy 2023–2040 Part 1: Strategic objectives and enablers.

APPENDIX A

Draft UK Airspace Coordination Service requirements and associated guidance

Introduction

- A1 The air traffic services licence granted to NATS (En Route) plc (“NERL”) under the Transport Act 2000 (the “Licence”) requires NERL to comply with guidance issued by the CAA in relation to how it provides:
- the UK Airspace Design Service (“UKADS”, and referred to as the Airspace Design Service in the Licence); and
 - the UK Airspace Coordination Service (“UKACS” and referred to as the Airspace Coordination Service in the Licence).
- A2 This document is the CAA requirements and guidance with which NERL’s should comply when providing the UKACS²⁵ and have regard to the requirements of any written strategic objectives document issued by the Secretary of State.²⁶ NERL should also comply with additional, associated guidance which applies to NERL’s provision of the UKACS and UKADS.²⁷
- A3 These requirements and guidance do not relate to how NERL prepares and progresses an airspace change proposal, including those which NERL is sponsoring as the UKADS provider, or those subject to coordination by NERL as the UKACS provider. Such proposals must follow the CAP 1616 airspace change process²⁸, which includes opportunities for stakeholders to engage with NERL and for them to be consulted about the proposal.
- A4 This document is also published under direction 4 of the Air Navigation Directions 2023 as it contains obligations on sponsors who are required to work and cooperate with NERL so that it can provide the UKACS efficiently and effectively.
- A5 Save where otherwise provided, terms used in this document have the meanings assigned to them in the Licence.

²⁵ [Placeholder for the final Licence condition]

²⁶ [Placeholder for the Secretary of State’s Strategic Objectives]

²⁷ [Placeholder for the final guidance relating to the provision of the UKADS and UKACS consulted on in CAP 3158.]

²⁸ [Airspace change process | UK Civil Aviation Authority](#)

Requirements and associated guidance

- A6 NERL's role, as the provider of the UKACS, is to facilitate coordination of certain aspects of the strategically important interdependent airspace change proposals within clusters where the UKADS (defined in the Licence as the Airspace Design Service) is not being provided (as set out in the strategic objectives issued by the Secretary of State).
- A7 Provision of the UKACS requires NERL to **facilitate coordination between the sponsors of strategically important interdependent airspace change proposals in the relevant cluster (Relevant Sponsors) and prepare a cumulative assessment and safety strategy outputs encompassing all the proposed airspace change proposals in that cluster. (See Requirements 1 to 4 below).**
- A8 Subject to coordination with Relevant Sponsors and the agreement of the CAA, NERL may provide support to airspace change proposals, where Relevant Sponsors are designated as responsible for such strategically important airspace change proposals.

Monitor strategically important airspace changes needed and provide advice

- A9 NERL's Licence defines a strategically important interdependent airspace change proposal with reference to this guidance:

A "strategically important interdependent airspace change proposal" means an airspace change proposal which the CAA has decided may make a significant contribution to achieving airspace modernisation and is interdependent with at least one other airspace change proposal.

There are several ways in which an airspace change proposal may make a significant contribution to achieving airspace modernisation. For example, if the proposal is likely to improve the overall performance of the airspace at a national and/or regional level:

- from an operational perspective, in terms of safety, capacity, efficiency and resilience
- from a consumer perspective, in terms of choice, value and the multiplied economic benefits of air connectivity
- in terms of supporting the aviation sector to reach net zero emissions by 2050, and limit and, where possible, reduce the total adverse effects from aviation noise

- in terms of integrating other airspace users including General Aviation, the Military, remotely piloted aircraft and other new and emerging forms of aviation.

An airspace change proposal may also be determined to meet the criteria if it influences the decisions made about strategically important airspace change proposals, i.e. is interdependent with it, for example:

- where an airspace change proposal forms part of a coordinated overall airspace design improving the performance of the airspace at a national or regional level
- where an airspace change proposal either enables or constrains other strategically important airspace change proposals because of its location, altitude, timing or sequencing.

A10 **Requirement 1: NERL as UKACS provider shall:**

- (i) **monitor the ongoing need for strategically important airspace change proposals in the UK; and**
- (ii) **determine whether each is interdependent with one or more other airspace change proposal. If so identified, and having engaged with Relevant Sponsors, NERL shall provide advice to the CAA and DfT that such airspace change proposals should form part of a “cluster” of interdependent airspace change proposals and be coordinated by NERL as part of its UKACS.**
- (iii) **NERL shall keep under review the need for coordinating any existing or new strategically important airspace change proposals.**²⁹
- (iv) **NERL shall keep under review progress by Relevant Sponsors of airspace changes in clusters of strategically important interdependent airspace changes and advise the DfT and CAA if sufficient progress is not being made in accordance with the coordinated timetable for that cluster.**

A11 NERL shall seek advice from the Advisory Board (required by its Licence) to obtain information necessary to meet this requirement.

²⁹ [Placeholder: As at the date of publication of this guidance, the sponsors of strategically important airspace change proposals requiring coordination as part of the UKACS are currently those airports and NERL airspace changes in the West (Bristol), Manchester (Manchester, Liverpool, East Midlands, Leeds Bradford) and Scottish (Edinburgh, Glasgow) clusters.]

- A12 The CAA and DfT will decide whether to accept NERL's advice on the number location and membership of all clusters. The CAA will publish any decisions on which airspace change proposals are considered strategically important and interdependent and whether they form part of a cluster requiring coordination by NERL as part of its UKACS. These decisions will result in obligations on NERL, as UKACS provider, and Relevant Sponsors as set out in Requirements 2, 3 and 4.

Deliver cumulative assessment outputs

- A13 Sponsors of linked airspace change proposals are required under the CAP 1616 airspace change processes and guidance to conduct a combined environmental assessment, using a methodology discussed and agreed with the CAA (an Agreed Methodology).
- A14 The ACOG has developed a way to comply with these CAP 1616 requirements for airspace change proposals it is coordinating: the cumulative assessment framework (CAF). The CAF has been endorsed by the CAA as an Agreed Methodology and comprises of three parts:
- **CAF Part 1** – This consists of a review of route interdependencies, design conflicts and trade-offs.
 - **CAF Part 2** – A full cumulative analysis. The performance data from the individual Full Options Appraisals carried out by the airspace change proposal sponsors in the cluster is collated. This is also made available for sponsors to describe in their consultations.
 - **CAF Part 3** – Final cumulative analysis following public consultation. The performance data from the individual Final Options Appraisals undertaken by the airspace change proposal sponsors in the cluster following any changes is collated. This final cumulative assessment should set out how consultation has informed the development of the final designs. This final analysis is available for sponsors to describe in their airspace change proposal submitted to the CAA for decision.
- A15 **Requirement 2: For each cluster where NERL is providing the UKACS, NERL is required to deliver the combined environmental assessment using an Agreed Methodology. The current Agreed Methodology is the CAF developed by the ACOG, unless an alternative methodology is agreed between NERL and the CAA.**
- (i) **NERL is required to submit CAF Parts 1 and 2 (or the equivalent in any alternative Agreed Methodology) to the CAA alongside the CAP 1616 'consult' gateway material submitted by the Relevant Sponsors in a cluster.**

- (ii) **Relevant Sponsors are required to cooperate with NERL and provide all required information to NERL to facilitate delivery of the combined environmental assessment, whether through the CAF or through an alternative Agreed Methodology, aligning their designs and developments for their airspace change proposals. Relevant Sponsors in a cluster will be unable to launch their consultations until they have all passed through their CAP 1616 'consult' gateway which includes a CAA assessment of CAF Parts 1 and 2 (or the equivalent in an alternative Agreed Methodology).**

A16 The CAA requires that Relevant Sponsors use common tools or formats to present their collective designs as a whole in order to aid stakeholder understanding. The CAA requires that the Relevant Sponsors' public consultation material includes details of the cumulative assessment so that the public can understand how any trade-offs have influenced the individual airspace change proposals.

A17 **Requirement 3:**

- (i) **NERL is required to deliver CAF Part 3 (or the equivalent in any alternative Agreed Methodology) alongside the Relevant Sponsors' final CAP 1616 airspace change proposal submissions, for assessment by the CAA.**
- (ii) **Relevant Sponsors are required to cooperate with NERL and to provide all required information to NERL to facilitate delivery of the CAF Part 3 (or the equivalent in an alternative Agreed Methodology), aligning their designs and developing their airspace change proposals following consultation.**

A18 *Note: For certain clusters, for example those containing only one strategically important airspace change proposals sponsored by an airport, and a network airspace change proposal sponsored by NERL, there may not be a need to provide CAF Parts 2 and 3 (or the equivalent in an alternative Agreed Methodology) due to the absence of combined effects.*

A19 *In such a situation, NERL is required to submit CAF Part 1 (or the equivalent in an alternative Agreed Methodology) to the CAA alongside the CAP 1616 'consult' gateway material submitted by the Relevant Sponsors (see Requirement 2(i)) making clear why it considers there is no need to provide CAF Parts 2 and 3 (or the equivalent in an alternative Agreed Methodology). The CAA will decide whether CAF part 2 and 3 are required.*

Deliver safety strategy outputs

- A20 The ACOG has developed a Safety Strategy, which the CAA has confirmed meets the requirements it's process. The Safety Strategy is a framework to identify and coordinate safety responsibilities where there are interactions between several airspace change proposals.
- A21 The Safety Strategy ensures that the Relevant Sponsors develop the safety cases for their individual airspace change proposals in a coordinated manner. The output of the Safety Strategy sets out roles and responsibilities for safety assurance, which assists the CAA in understanding the complex safety responsibilities within the system-wide design.
- A22 As set out in CAP 1616, responsibility for the adequacy of the risk assessment and mitigation rests with the sponsor of the airspace change proposals or designated controlling authority, as owners of the safety arguments, who must comply with all relevant legal and regulatory requirements.
- A23 **Requirement 4:**
- (i) **Relevant Sponsors are required to cooperate with NERL and to provide all required information to NERL to facilitate delivery of the outputs from the Safety Strategy. The Safety Strategy developed by the ACOG shall be followed, unless an alternative methodology is agreed between NERL and the CAA.**
 - (ii) **Relevant Sponsors are required to align their responsibilities within their airspace change proposals with the outputs of the Safety Strategy (or the equivalent in an alternative Agreed Methodology).**
 - (iii) **NERL is required to submit the outputs of the Safety Strategy (or the equivalent in an alternative Agree Methodology) to the CAA alongside the Relevant Sponsors' final airspace change proposal submissions, for assessment by CAA.**

Consultation question 3: Do you agree with the draft UKACS requirements and associated guidance?

- ☐ about right
- ☐ minor modifications needed
- ☐ major modifications needed
- ☐ don't know

Please explain your answer.