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Contents

Contents	3
Revision History	5
Purpose of this document	6
Chapter 1	8
Background	8
Airspace modernisation	8
A new means to deliver modernised airspace design	8
Consultation on the UKADS concept	10
New or revised DfT and CAA policy documents	10
More information	12
Chapter 2	13
Information common to all consultations	13
Introduction	13
Government policy on airport expansion and capacity	13
Planning decisions and airspace design decisions	14
Government policy and CAA processes and decisions: the legal and policy framework	15
The current approach to changes to airspace design	16
UKADS as an additional model to develop airspace change proposals	17
UKACS as a revised model to coordinate airspace change proposals	18
Guidance for and oversight of NERL's proposed licence obligation to provide the UKADS and UKACS	18
Overall summary of the proposed future models for developing airspace change proposals	19
Airspace Design Support Fund	20
Relationship between the NERL air traffic services licence and related policy documents	20
Summary of proposed NERL airspace change roles	20

Chapter 3	22
New or revised DfT and CAA policy documents	22
Introduction	22
DfT documents	22
DfT and CAA document	23
CAA documents	23
ANNEX A	26
Relationship between airspace change and the legal/policy framework	26

Revision History

1st edition

September 2025

This publication 'signposts' stakeholders of airspace modernisation to changes that are planned, or to be consulted on, in autumn 2025. Respondents to each consultation are encouraged to read this publication so that they have access to the background and further information it contains.

2nd edition

November 2025

As anticipated in the first edition, we are publishing a second edition of this document to coincide with the publication of some documents that it refers to. The revisions in this second edition consider:

- documents that have been published since the first edition was published
- statements from government clarifying or providing further information on aspects of relevant government policy
- developments in DfT or CAA policy proposals that are reflected in documents or consultations published at the same time as this second edition (or due to be published shortly after it).

All revisions to the first edition are marked with red underline.

Purpose of this document

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")**.
2. The **Department for Transport ("DfT")** and the UK CAA are proposing to give the task of providing the UKADS to NERL through modifications to its **air traffic services licence ("NERL's licence")**.
3. The modifications that the CAA proposes to make to NERL's licence will be subject to further consultation later in 2025 as the CAA publishes "Final Proposals" to follow up on the "Initial Proposals"¹ issued by the CAA earlier this year. In addition, the DfT has published² and the CAA has published for consultation³ a series of policy documents. Additional DfT policy documents are planned for consultation later in 2025 and in 2026.
4. This document sets out each of the documents that we propose to publish or have published with a short summary of what each involves and where you can find more information. It also explains:
 - the background common to all these proposed documents, including the regulatory and policy framework;
 - why these new documents (or revised documents) are necessary and being proposed; and
 - how this document is to be incorporated by reference into each of the separate consultation documents.
5. This second edition contains a statement of the policy position at the date of its publication and "signposts" stakeholders to the changes that are planned, or which are to be consulted on. We may need to update this document. If applicable, later versions of this document will identify any amendments and when they were made. Once the consultations into which this document is

¹ [CAP 3121 Economic Regulation of NERL: Initial proposals for modifying the Licence to support the implementation of a UK Airspace Design Service | UK Civil Aviation Authority](#)

² [Strategic Objectives - Airspace modernisation | Department for Transport](#); [UK Airspace Design Support Fund rules and eligibility criteria | Department for Transport](#); [UK airspace design service: modifications to NERL licence terms | Department for Transport](#)

³ [Consultation on draft guidance for the UK Airspace Design and Coordination Services | UK Civil Aviation Authority](#); [Consultation on the requirements for the UK Airspace Coordination Service and associated guidance | UK Civil Aviation Authority](#)

incorporated have closed, and final outcomes published, this document will no longer be updated.

6. For the latest news about the UKADS please visit www.caa.co.uk/ukads.

Chapter 1

Background

Airspace modernisation

- 1.1 Modernisation of UK airspace is essential to ensure that it is fit for purpose in the future. Modernising airspace will make it more efficient and flexible, reduce bottlenecks, help UK aviation to achieve net zero emissions by 2050, and better manage aviation's noise impact. Furthermore, it will increase the resilience of flights to disruption, giving consumers confidence in the network and reducing airline costs. Airspace re-design is a key aspect of modernisation.
- 1.2 Aligned with the Airspace Modernisation Strategy⁴, modernisation will be delivered by industry. It will enable increased airspace capacity, making possible:
- new flights and destinations, providing more choice and better value for passengers and shippers, and potentially wider benefits to the UK economy;
 - the integration of new types of airspace user, facilitating innovation⁵; and
 - facilitating the requirements of the Military and General Aviation, including recreational flyers.

A new means to deliver modernised airspace design

- 1.3 Any proposal to change the design of airspace (which is generally shortened to *airspace change proposal*) must follow the CAA's CAP 1616 airspace change process and guidance.⁶ The current model for changing airspace design, under which a change sponsor (usually an airport or air navigation service provider) proposes and funds a new airspace change proposal that meets their needs, has not delivered the optimal system for airspace design required for the modernisation of UK airspace. Modernised designs must enable capacity, deliver benefits such as system resilience and consider the government's environmental objectives while also being compatible and coordinated with changes proposed for neighbouring airports. By way of example, the airspace around London is particularly complex, with interdependent airspace change proposals relating to

⁴ [About the strategy. Information about the Airspace Modernisation Strategy | UK Civil Aviation Authority](#)

⁵ Supporting the [Government's priority](#) to realise the economic growth benefits of new technologies and the joint DfT and CAA future of flight strategy including [CAP 3182 Future of Flight BVLOS Roadmap | UK Civil Aviation Authority](#)

⁶ [Airspace change process. Guidance on changes to the use or classification of UK airspace | UK Civil Aviation Authority](#)

at least 11 airports, each under separate sponsorship and with their own independent operational objectives.

- 1.4 In 2018, a new initiative was implemented. The DfT and CAA commissioned NERL to set up the **Airspace Change Organising Group (“ACOG”)** to produce an airspace change “masterplan” (that is, a single coordinated implementation plan for airspace changes in the UK up to 2040). Since 2018, this has been the main methodology being used, aiming to better achieve coordinated system-wide airspace modernisation.⁷
- 1.5 The masterplan has been produced in a series of iterations, including 18 strategically important UK airports, divided into four geographical ‘clusters’: London, Scottish, Manchester and West.
- 1.6 Airspace change sponsors within each cluster develop individual airspace change proposals and together with ACOG are required to coordinate their development into a coordinated masterplan for each cluster.
- 1.7 Recent Government decisions⁸ will boost the delivery of much-needed airspace modernisation by:
 - **introducing an additional model under which a single entity is responsible for designing a block of UK airspace that covers the area of airspace managed by more than one airport⁹: this will be the ‘UK Airspace Design Service’.** NERL as the UKADS provider will be the “guiding mind” sponsoring the airspace change proposal in any area it is required to provide the UKADS to deliver the holistic, modernised airspace design envisaged by the Airspace Modernisation Strategy; and
 - requiring NERL to continue to coordinate other strategically important interdependent airspace change proposals that are outside the scope of the UKADS.
- 1.8 As a result, and as set out below, we are proposing that there will be three models for developing the airspace change proposals that are needed to modernise UK airspace design.

⁷ [Airspace change masterplan. Information on the masterplan | UK Civil Aviation Authority](#). Note that the future of the masterplan will be affected by some of the plans referred to in this document.

⁸ [Government announcement 17 March 2025 | HM Treasury](#) and [DfT statement 2 June 2025 | Department for Transport](#)

⁹ Or air navigation service provider.

Consultation on the UKADS concept

- 1.9 The DfT and CAA consulted¹⁰ on the UKADS concept in the autumn of 2024.
- 1.10 The CAA's Chief Executive, Rob Bishton, wrote to the Prime Minister on 15 January 2025 setting out what the CAA can do to further enable UK economic growth and investment. That letter identified measures to improve confidence in the delivery of airspace modernisation and included a commitment to support any government decision to establish a UKADS to accelerate and enhance the airspace changes that are vital to achieving airspace modernisation.¹¹
- 1.11 In its announcements (as well as in the UKADS consultation response document¹²) the Government confirmed that:
- it would establish a UKADS and (for some airports outside the initial scope of the UKADS) an Airspace Design Support Fund, and that both would be funded by a proposed new UK Airspace Design Charge. Its ambition is for NERL to be mobilising the UKADS by the end of 2025
 - NERL would continue to provide a coordination service for strategically important interdependent airspace change proposals where it is not providing the UKADS (but those airspace change proposals would continue to be sponsored by their existing change sponsors); and
 - the DfT and CAA (respectively) would consult on a package of new (or amended) policy and process for airspace design, which would retain the important principles of a transparent, evidence-based process that will involve all stakeholders.
- 1.12 The UKADS consultation response document referred to above contains more information on these matters.

New or revised DfT and CAA policy documents

- 1.13 The UKADS consultation response document committed to establishing the initial UKADS operating model, to be provided by NERL, as soon as possible.
- 1.14 The modifications to NERL's licence, including in relation to the UK Airspace Design Charge, to implement the policy decisions require specific consultation

¹⁰ [Airspace modernisation - consultation on a UK Airspace Design Service | UK Civil Aviation Authority](#)

¹¹ [CAP3085: Letter from the Prime Minister, December 2024: Supporting Growth | UK Civil Aviation Authority](#) and [CAP3085A: Letter from the office of the Chief Executive to the Prime Minister, January 2025: Supporting Growth | UK Civil Aviation Authority](#)

¹² [CAP3106: Airspace modernisation: Outcome of the consultation on a UK Airspace Design Service | UK Civil Aviation Authority](#) and [UK Airspace Design Service | UK Civil Aviation Authority](#)

and decisions in accordance with the statutory processes provided for in the Transport Act 2000. These include:

- the laying of two Statutory Instruments relating to the Transport Act 2000 to enable the necessary modifications to NERL's licence¹³;
- a DfT consultation on modifying certain "terms" in NERL's licence to authorise NERL to carry out the activities of the UKADS and a subsequent DfT decision on those terms¹⁴; and
- a CAA consultation on Initial Proposals¹⁵ (and subsequent statutory consultation on Final Proposals to follow) for modifications to the "conditions" of NERL's licence to require NERL to provide the UKADS and provide for how it should be financed, and a subsequent CAA decision on those conditions.¹⁶

1.15 The DfT will be publishing, and in some cases consulting on, a number of documents in order to update the overarching government policy documents that impact on airspace design to reflect up-to-date government policy.

1.16 The CAA has published (or will shortly publish) for consultation, a number of documents in order to:

- implement the new model under which a single entity (NERL as the UKADS provider) is responsible for designing a block of UK airspace that covers the area of airspace managed by more than one airport (or air navigation service provider) and proposing that as an airspace change proposal to the CAA;
- amend the approach to NERL's coordination of some airspace change proposals (in place of the service currently provided by NERL through ACOG). We propose this will be called the UK Airspace Coordination Service (UKACS); and
- update and rationalise the airspace change process and guidance for all airspace change proposals to ensure the regulatory requirements remain proportionate, while supporting the CAA to make informed, evidence based, transparent decisions.

1.17 A diagram (and associated description) of all these documents and their relationship to one another is published in [Annex A](#). The CAA will keep that up to date with links to the consultations and final documents as they are published.

¹³ [The Transport Act 2000 \(Air Traffic Services\) \(Amendment\) Order 2025](#) and [The Transport Act 2000 \(Air Traffic Services\) \(Prescribed Terms\) Regulations 2025](#)

¹⁴ [UK airspace design service: modifications to NERL licence terms | Department for Transport](#)

¹⁵ Published in June 2025 as CAP 3121. [UKADS – licence proposals | UK Civil Aviation Authority](#)

¹⁶ Links will be added to [Annex A](#) and the CAA website once published.

More information

- 1.18 For information and the latest news about the UKADS please visit www.caa.co.uk/ukads.

Chapter 2

Information common to all consultations

Introduction

2.1 The diagram in [Annex A](#) describes the proposed inter-relationship between airspace change proposals, the policy documents referred to in Chapter 3 and the legal and policy framework. This document is intended to be incorporated by cross reference into all the CAA consultations or related documents that are being published to implement the proposed modernised approach to designing airspace in the UK. We have grouped the information under the following headings:

- government policy on airport expansion and capacity
- planning decisions and airspace design decisions
- government policy and CAA processes and decisions: the legal and policy framework
- the current approach to changes to airspace design
- UKADS as an additional model for developing airspace change proposals
- UKACS as a revised model to coordinate airspace change proposals
- guidance for and oversight of NERL's proposed licence obligation to provide UKADS and UKACS
- overall summary of the proposed future models for developing airspace change proposals
- Airspace Design Support Fund
- relationship between NERL's Licence and related policy documents
- summary of proposed NERL airspace change roles.

Government policy on airport expansion and capacity

2.2 The Government believes that aviation can make a key contribution to achievement of economic growth, increasing the prosperity of the whole country¹⁷. Government policies on aviation infrastructure are set out in the "Making Better Use of Existing Runways" policy statement¹⁸ and the **Airports**

¹⁷ [Government update on airport expansion | Department for Transport](#)

¹⁸ [Aviation strategy: making best use of existing runways | Department for Transport](#)

National Policy Statement (“ANPS”)¹⁹ approved by Parliament and designated by the Secretary of State. In summary, those provide that new runway capacity is to be built at Heathrow Airport and that all airports and aerodromes are to make best use of their existing runways, thereby maximising the UK's overall aviation capacity and consequently the possible number of air traffic movements in UK airspace.

- 2.3 The DfT launched a review of the ANPS on 22 October 2025²⁰ and said it will announce a single scheme for delivering a third runway at Heathrow, to inform the review of the ANPS, by the end of November 2025. The Government also said that it is committed to making a decision on a third runway at Heathrow within this Parliament, and that if the ANPS review concludes that amendments are needed, it will consult on an amended policy statement by summer 2026.
- 2.4 Noting the need for modernised airspace to deliver the scheme on time, the Government has said that UKADS would “initially prioritise airspace design for the London region supporting both Heathrow and the wider network”. To reflect that decision, the Government has published **Strategic Objectives for NERL’s provision of its UKADS and UKACS obligations**²¹ that will apply, subject to the CAA’s modification of its Licence.
- 2.5 The Government aims to facilitate growth in aviation capacity within its legally binding environmental and climate obligations and said it will be seeking the independent opinion of the Climate Change Committee.
- 2.6 Although total carbon emissions from aviation are expected to rise as a proportion of total UK emissions, airspace modernisation aims to decrease carbon emissions per flight.

Planning decisions and airspace design decisions

- 2.7 The Minister for State, Department for Transport confirmed (in the House of Lords on 14 July 2025): "... airspace modernisation is about better managing our airspace, not seeking permission for new flights. The number of flights operating from UK airports, including those facilitated by a new runway, is determined not by modernisation but rather through the planning process...".²²

¹⁹ [Airports National Policy Statement | Department for Transport](#); *The Government has said the Airports NPS will be reviewed “at speed” if and when it receives new expansion proposals, and that it is possible that the Airports NPS might need to be amended if any proposals are substantially different from those envisaged in 2018; Heathrow airport expansion: 2025 proposals - House of Commons Library*. A link to that consultation once published will be added to [Annex A](#) and the CAA website.

²⁰ [Realising the benefits of expansion at Heathrow Airport | Department for Transport](#)

²¹ [Strategic Objectives - Airspace modernisation | Department for Transport](#)

²² [Transport Act 2000 \(Air Traffic Services\) \(Prescribed Terms\) Regulations 2025](#)

- 2.8 As the UK's specialist aviation safety regulator, and the body charged by the Secretary of State with taking airspace change decisions, the CAA has a key role to play in the implementation of the Government's aims by ensuring the safe and efficient design of airspace to respond to the growth in capacity delivered by the Government's policies and the planning system.
- 2.9 Airports and aerodromes provide the means for the majority of aviation activity to take place. This ground infrastructure is the primary enabler of aviation activity. The CAA's functions do not include policy-making or decision-taking about the amount of ground infrastructure or where it is located.
- 2.10 Policies and decisions about the construction and any limits on operation of airports and aerodromes are primarily within the ambit of the planning system and taken forward through planning applications and applications for development consent orders under the Planning Act 2008. Planning decisions determine whether new infrastructure may be constructed in a particular location and may include conditions limiting the scale of operations. In its recent statement²³ the Government noted that its Planning Infrastructure Bill²⁴ will “streamline the delivery of major infrastructure, including Heathrow. This includes faster consenting routes and more proportionate consultations”.
- 2.11 Such planning decisions consider the total capacity for air traffic movements to and from UK airports, and the first-order environmental effects of those movements (such as the overall amount of noise and carbon emissions they generate).
- 2.12 Those decisions are guided, among other things, by Government policies including the “Making Better Use of Existing Runways” policy statement and (in the case of Heathrow) the ANPS referred to above.
- 2.13 Airspace modernisation is an important part of enabling any new capacity to be utilised once it has been approved by any planning consents.

Government policy and CAA processes and decisions: the legal and policy framework

- 2.14 In accordance with the Transport Act 2000, the Secretary of State gives the CAA its airspace functions in the **Air Navigation Directions**. Under section 70(1) of the Transport Act 2000, the CAA's primary duty when carrying out such airspace functions is to maintain a high standard of safety. Subject always to that overriding duty, the CAA has a duty under section 70(2) to consider eight other

²³ [Realising the benefits of expansion at Heathrow Airport | Department for Transport](#)

²⁴ [Planning and Infrastructure Bill - Parliamentary Bills - UK Parliament](#)

factors, including a duty to take account of any guidance on environmental objectives given to the CAA by the Secretary of State (section 70(2)(d)).

- 2.15 That guidance is known as the **Air Navigation Guidance**. It sets out the Government's environmental objectives that the CAA must seek to achieve in the exercise of its air navigation functions and gives the CAA guidance on how it is to achieve these objectives in the context of its duties under section 70 of the Transport Act 2000. That includes guidance on how environmental objectives fit alongside the other factors listed in section 70(2) when the CAA is considering how best to give effect to the listed factors as a whole under section 70(3).
- 2.16 The Government commenced their consultation on changes to the Air Navigation Guidance and Air Navigation Directions in November 2025.²⁵
- 2.17 The CAA's airspace functions include to maintain and keep under review an Airspace Modernisation Strategy that gives effect to Government policies in relation to UK airspace and to create and to maintain an overall UK airspace design that enables the safe operation of the capacity permitted by the planning system.
- 2.18 CAA decisions on the design of airspace are primarily concerned with maintaining a high standard of safety, but must also consider matters such as the distribution of noise experienced on the ground in the vicinity of airports and the use of navigation techniques to improve flight efficiency and thus reduce carbon emissions. Conversely, decisions taken in the planning system are not concerned with the detailed design of airspace.
- 2.19 Appendix B of the Airspace Modernisation Strategy and the CAA's website²⁶ set out more information about the current legal and policy framework.

The current approach to changes to airspace design

- 2.20 As explained in Chapter 1, until now, changes to airspace design have generally been sponsored by those responsible for managing airspace. Some airspace change proposals are considered strategically important because they are needed to deliver airspace modernisation. Where these are also interdependent, NERL (through ACOG) has been required to coordinate them, in a series of four regional masterplan clusters.²⁷

²⁵ [Changes to the air navigation directions and air navigation guidance | Department for Transport](#)

²⁶ [Legislative framework to airspace change | UK Civil Aviation Authority](#)

²⁷ [Airspace change masterplan | UK Civil Aviation Authority](#) Note that the future of the masterplan will be affected by some of the planned changes referred to in this document.

UKADS as an additional model to develop airspace change proposals

- 2.21 The key elements of the Government's decision to create the UKADS propose that:
- NERL will be required to provide the UKADS through a new obligation in its licence; and
 - the funding of some airspace change proposals will be reformed by creating a new UK Airspace Design Charge²⁸ to be levied on relevant airspace users, where this charge:
 - allows the recovery of the efficient costs of NERL in providing the UKADS; and
 - supports the creation of an Airspace Design Support Fund to provide financial support for the sponsors of eligible airspace change proposals that are outside the scope of UKADS. The DfT has published draft rules and eligibility criteria²⁹ setting out proposals for which airspace change proposals may be able to access the Support Fund and for which costs.
- 2.22 It is also proposed that NERL, as the UKADS provider, will 'hold the pen' on an airspace change proposal in relation to each UKADS 'delivery focus area'. Subject to the licence modification procedure, the Secretary of State's published Strategic Objectives³⁰ for NERL's UKADS and UKACS licence obligations state that NERL's first priority delivery focus area will be to provide the UKADS in the London TMA region and to implement the relevant deployments by 2035. The Strategic Objectives also mandate the airspace change proposal to:
- prioritise maintaining a high standard of safety; and
 - be consistent with the Airspace Modernisation Strategy, secure system-wide benefits and overall network optimisation that results in the most efficient and resilient airspace network possible whilst taking account of Government guidance made under section 70(2)(d) of the Transport Act 2000.³¹

²⁸ Details of the proposed charge will be set out in and are subject to the Licence proposals consultations. Links to those consultations will be added to [Annex A](#) and the CAA website when available.

²⁹ [UK Airspace Design Support Fund rules and eligibility criteria | Department for Transport](#)

³⁰ [Strategic Objectives - Airspace modernisation | Department for Transport](#)

³¹ Note the textual modification to the mandate that was published in CAP 3106, the UKADS consultation response document (footnote 12).

- 2.23 Any design to modernise the complex airspace around London to be prepared by the UKADS will include changes to the design required for a third runway at Heathrow.
- 2.24 The airspace change proposal to be prepared by NERL as the UKADS provider must follow the CAA's airspace change process and guidance.
- 2.25 In each delivery focus area, the airspace change proposal to be prepared by NERL as the UKADS provider will supersede the current approach of individual change sponsors preparing multiple airspace change proposals (coordinated by ACOG) in the clusters covered by current airspace change masterplans.

UKACS as a revised model to coordinate airspace change proposals

- 2.26 NERL will provide a residual coordination role for the airspace change proposals within the remaining clusters outside the area(s) of the UKADS, but we propose that no masterplan will be required for such clusters. This role will be known as the **UK Airspace Coordination Service ("UKACS")**. It is also proposed that NERL will not be required to operate the UKACS from an impartial unit and that the service will continue to be funded from the existing ACOG provision in the NR23 price control decision.³² The CAA has published a consultation on the requirements for the UK Airspace Coordination Service and associated guidance³³.

Guidance for and oversight of NERL's proposed licence obligation to provide the UKADS and UKACS

- 2.27 The CAA has also published, for consultation, draft guidance on both of NERL's proposed new roles.³⁴ This draft guidance sets out our expectations for how NERL will create its strategic delivery plan, its stakeholder engagement plan and appoint an Advisory Board. We also propose that day-to-day governance by the DfT and CAA of NERL's UKADS and UKACS will be achieved by:
- provision of information and reports by NERL to the DfT and CAA, and
 - including oversight of UKADS and UKACS activities within the existing Airspace Modernisation Strategy governance structure

³² [Current price control NR23 \(2023-2027\) | UK Civil Aviation Authority](#)

³³ [Consultation on the requirements for the UK Airspace Coordination Service and associated guidance | UK Civil Aviation Authority](#)

³⁴ [Consultation on draft guidance for the UK Airspace Design and Coordination Services | UK Civil Aviation Authority](#)

(noting that ultimately NERL's UKADS and UKACS obligations can be enforced via existing Licence enforcement mechanisms).

Overall summary of the proposed future models for developing airspace change proposals

- 2.28 As a result of the introduction of the UKADS and the repurposed and reduced former role of the ACOG into the UKACS, and subject to CAA consultations referred to in this document, in the future there will be three models for developing airspace change proposals in the UK:
- UKADS: strategically important, interdependent airspace changes which will be combined into an airspace change proposal for a specified, delivery focus area(s) sponsored by NERL, as the UKADS provider. NERL will be responsible for determining the contents of the proposal that is put forward to the CAA for decision;
 - UKACS: strategically important, interdependent airspace change proposals where the UKADS is not being provided and therefore sponsored by an airport or air navigation service provider that manages the airspace, coordinated by NERL as the UKACS provider. Each change sponsor remains responsible for progressing all aspects of the airspace change proposal, including submission to the CAA for decision; and
 - all other airspace changes (where the change sponsor is wholly responsible for proposing the contents of the proposal that is put forward to the CAA for decision).
- 2.29 For any given geographical area, airspace change proposals may therefore comprise either:
- an airspace change proposal developed and sponsored by NERL as the UKADS provider;
 - a UKACS-coordinated cluster of interdependent airspace change proposals (sponsored by or on behalf of individual airports or air navigation service providers); or
 - an airspace change proposal developed and sponsored solely by an individual sponsor.
- 2.30 Whichever model is being used to develop a particular airspace change proposal, all must adhere to the CAA's airspace change processes and guidance and must work together with the rest of the overall UK airspace design.

Airspace Design Support Fund

- 2.31 As noted above, the Government has also decided to set up an Airspace Design Support Fund. It is proposed that this is funded through the UK Airspace Design Charge, which is intended to be levied on airspace users who also pay the existing en route charge. The DfT has published the draft fund rules and eligibility criteria³⁵ which set out proposals for who can apply for the fund, what costs the fund covers and the application process. It is proposed that NERL will be responsible for administering (allocating funds from) the Airspace Design Support Fund as directed by the DfT or CAA.

Relationship between the NERL air traffic services licence and related policy documents

- 2.32 Subject to the relevant statutory processes set out in the Transport Act 2000, NERL will be required by conditions of its licence to provide the UKADS and UKACS (and to administer the Airspace Design Support Fund as directed by the DfT or CAA.)
- 2.33 The modifications to NERL's Licence³⁶ will set out how NERL should respond to the Strategic Objectives³⁷ published by the Secretary of State and Guidance for the UKADS and UKACS published by the CAA.³⁸ We are proposing that any amendments to the Strategic Objectives will be subject to consultation.

Summary of proposed NERL airspace change roles

- 2.34 Figure 2.1 below shows the different roles proposed for NERL relating specifically to airspace change.³⁹ It shows:
- NERL's existing function of considering necessary airspace change proposals for en route airspace design;
 - NERL's proposed function, as UKADS provider, of creating an airspace change proposal for airspace in the delivery focus areas (as prioritised by the Secretary of State);

³⁵ [UK Airspace Design Support Fund rules and eligibility criteria | Department for Transport](#)

³⁶ The CAA's consultation on its Final Proposals for modifications to the conditions of NERL's licence will be published [here](#) as soon as it is available.

³⁷ [Strategic Objectives - Airspace modernisation | Department for Transport](#)

³⁸ [Consultation on draft guidance for the UK Airspace Design and Coordination Services | UK Civil Aviation Authority](#); [Consultation on the requirements for the UK Airspace Coordination Service and associated guidance | UK Civil Aviation Authority](#)

³⁹ These airspace change roles are in addition to NERL's core role to provide en route air traffic services and associated obligations, set out in its licence.

- NERL's proposed amended function, as UKACS provider, of providing a coordination service for the airspace change proposals of strategically important, interdependent airspace change proposals where the UKADS is not being provided, grouped into geographic clusters; and
- NERL's proposed function to administer the Airspace Design Support Fund as directed by the DfT or CAA.

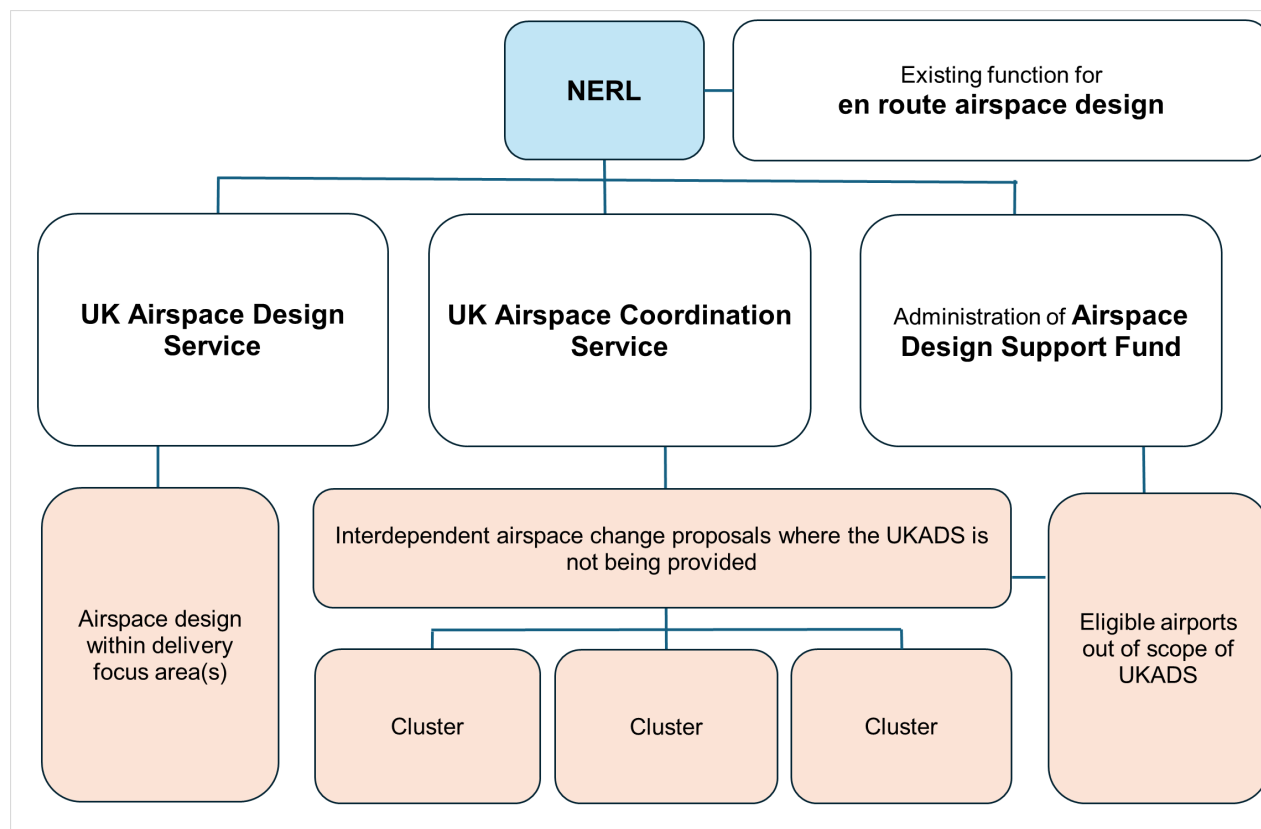


Figure 2.1: Proposed NERL functions relating to airspace change

Chapter 3

New or revised DfT and CAA policy documents

Introduction

- 3.1 This chapter lists the new or amended policy documents that the DfT and the CAA will be publishing, and in some cases consulting on. This chapter may be updated. If applicable, later versions of this document will reflect any amendments.

DfT documents

Airports National Policy Statement (under review)

Current document (2017): [Airports National Policy Statement | Department for Transport](#)

Purpose: Sets out the UK's policy framework for expansion at Heathrow Airport and is the primary basis for decision-making on any development consent application for a new runway.

Revision: Currently under review.

Air Navigation Directions (revision)

Current document (2023): [The Civil Aviation Authority \(Air Navigation\) Directions 2023](#)

Purpose: Provision of duties (referred to in this document as functions) and powers to the CAA by the Secretary of State under the Transport Act 2000.

Revision: Consultation published 25 November 2025. [Changes to the air navigation directions and air navigation guidance | Department for Transport](#)

Air Navigation Guidance (revision)

Current document (2017): [UK air navigation guidance 2017 - GOV.UK](#)

Purpose: Sets the Government's environmental objectives that the CAA must seek to achieve in the exercise of its air navigation functions and gives the CAA guidance on how it is to achieve these objectives in the context of its duties under section 70 of the Transport Act 2000.

Revision: Consultation published 25 November 2025. [Changes to the air navigation directions and air navigation guidance | Department for Transport](#)

UK Airspace Design Support Fund rules and eligibility criteria

Current document (2025): Policy paper [UKADS 25/3](#) Airspace Design Support Fund.

Purpose: The eligibility criteria and rules of the Airspace Design Support Fund

Revision: Draft published November 2025. [UK Airspace Design Support Fund rules and eligibility criteria](#) | Department for Transport

Strategic objectives for NERL's UKADS and UKACS licence obligations

Current document: None. New document.

Purpose: To establish the delivery focus areas for NERL's provision of the UKADS and what the airspace design must achieve. To set the area where NERL must provide the proposed UKACS.

Revision: Published November 2025. [Strategic Objectives - Airspace modernisation](#) | Department for Transport

DfT and CAA document

NERL's Licence

Current document (2024): [NERL licence and monitoring](#)

Purpose: Creating new obligations for NERL to provide the UKADS, the UKACS and to administer the Airspace Design Support Fund, and related amendments to existing obligations.

Revision: DfT decision to modify licence **terms** published November 2025 [UK airspace design service: modifications to NERL licence terms - GOV.UK](#). CAA consultation on modifying licence **conditions** initial proposals [published here](#). CAA final proposals will be published for consultation later in 2025. Final CAA decision on conditions modifications will be published after consideration of responses to final proposals consultation.

CAA documents

CAP 1616 airspace change process and guidance

Current document: CAP 1616 [Airspace change process](#) | [UK Civil Aviation Authority](#).

Purpose: The process (and its guidance) that an airspace change proposal (to make a change to the airspace design) must follow.⁴⁰ Decisions on the proposal are taken by the CAA (or by the Secretary of State where a proposal has been 'called in').

⁴⁰ Sponsors of airspace change proposals that are onboarded to the UKADS through the onboarding process (for the London cluster, this is [CAP 3129](#)) become partners of the UKADS.

Revision: [Consultation published 25 September 2025](#) [Consultation on the airspace change process - Civil Aviation Authority - Citizen Space](#)

CAP 3129 Onboarding process for the UKADS provider for the London cluster

Purpose: To set out how existing airspace change proposals within the London cluster of the airspace change masterplan will be transferred to enable NERL as the UKADS provider to sponsor an airspace change proposal for the London TMA Region.

New document: Published 1 September 2025 [CAP3129: Onboarding Process for the UK Airspace Design Service \(UKADS\) Provider for the London TMA Region | UK Civil Aviation Authority](#).

Onboarding process for the UKADS provider for other areas (if applicable)

Current document: None. Other cluster-specific onboarding processes will be published if required.

Purpose: To set out how existing airspace change proposals in a specified cluster of the current airspace change masterplan will be transferred to enable NERL as the UKADS provider to sponsor an airspace change proposal for that area.

Draft guidance for the UK Airspace Design and UK Airspace Coordination Services

Current document: None. New document proposed.

Purpose: To set out how NERL is to provide the UKADS and the UKACS, in particular:

- [developing a strategic delivery plan](#)
- [the role and function of the Advisory Board](#)
- [developing a stakeholder engagement plan](#)

Revision: [Consultation published November 2025](#). [Consultation on draft guidance for the UK Airspace Design and Coordination Services](#)

Draft requirements for the UK Airspace Coordination Service (UKACS) and associated guidance

Current document: [CAP 2156a: Airspace change masterplan - CAA acceptance criteria | UK Civil Aviation Authority](#) and [CAP 2156b: Airspace change masterplan – assessment framework | UK Civil Aviation Authority](#)

Purpose: To set out the requirements on [and associated guidance for](#) NERL [and relevant sponsors](#) in relation to the proposed UK Airspace Coordination Service (UKACS).

Revision: Consultation published November 2025. The final document will replace CAP 2156a and CAP 2156b. [Consultation on the requirements for the UK Airspace Coordination Service and associated guidance](#)

CAP 1711 Airspace Modernisation Strategy

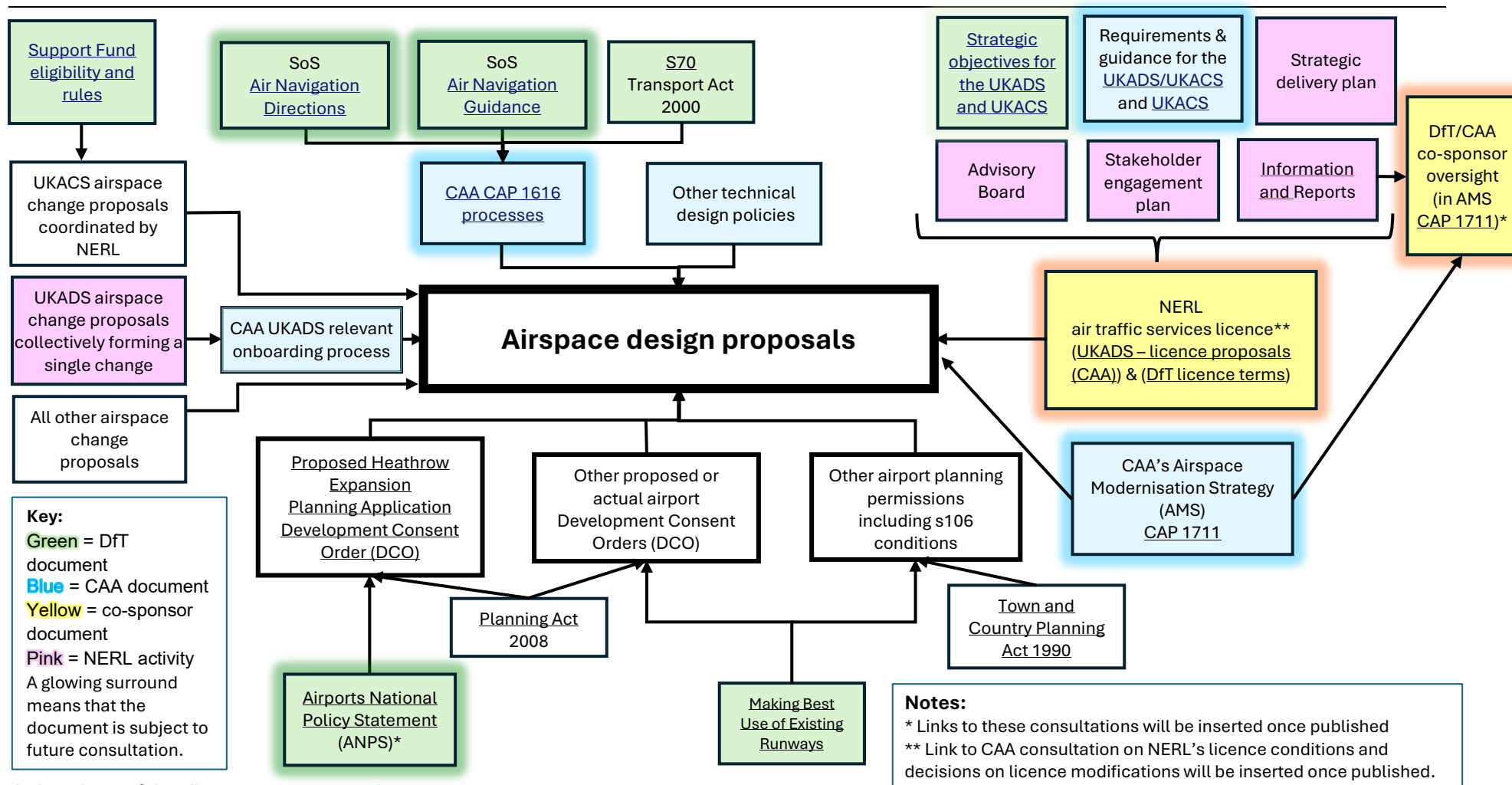
Current document: [CAP 1711](#) Airspace Modernisation Strategy 2023–2040 Part 1: Strategic objectives and enablers.

Purpose: A coordinated strategy for the use of all UK airspace for air navigation up to 2040 [including the Airspace Modernisation Strategy governance structure](#)

Revision: Amendments required to

- take account of revised Government policy in any revised Airports National Policy Statement, Air Navigation Directions or Air Navigation Guidance.
- adapt the mechanisms by which the co-sponsors (DfT and CAA) oversee NERL's provision of UKACS (formerly ACOG as amended), the new UKADS and the new Airspace Design Support Fund administration. CAA consultation to be published. See [Consultation on draft guidance for the UK Airspace Design and Coordination Services](#) (Annex B)

ANNEX A

Relationship between airspace change and the legal/policy framework

A descriptor of the diagram appears on the next page.

Figure A1: Envisaged inter-relationship between airspace change and the legal and policy framework

Descriptor of Figure A1

Summary

A1 The CAA has produced a diagram setting out the proposed inter-relationships between NERL (as the UKADS and UKACS provider, and the Airspace Design Support Fund administrator as directed by the DfT or CAA) and the relevant current or potential legal and policy framework. Some documents have yet to be published and will be subject to consultation.

Key to the diagram

- Any box in green is a DfT document.
- Any box in blue is a CAA document.
- Any box in yellow is a co-sponsor (DfT and CAA) document or activity.
- Any box in pink is a NERL activity.
- A coloured glowing surround means that the document is subject to future consultation.

Notes to the diagram

- A single asterisk indicates that a link to this consultation will be inserted once published.
- A double asterisk indicates that links to a CAA consultation on NERL's licence conditions as well as links to DfT and CAA decisions on licence modifications will be inserted once published.

Description of the diagram

A2 **At its heart**, the diagram has airspace design proposals.

A3 The **left section** feeding into this shows three types of airspace change proposal:

- UKACS: Airspace change proposals coordinated by NERL (supported by the Airspace Design Support Fund, for which there are funding eligibility criteria and rules⁴¹);
- UKADS: More than one existing airspace change proposal collectively forming an airspace change proposal (via the relevant CAA UKADS onboarding process, which for the London area is CAP 3129⁴²); and

⁴¹ [UK Airspace Design Support Fund rules and eligibility criteria | Department for Transport](#)

⁴² [CAP3129: Onboarding Process for the UK Airspace Design Service \(UKADS\) Provider for the London TMA Region | UK Civil Aviation Authority](#)

- All other airspace change proposals.

A4 The **right section** shows various proposed documents mentioned in the CAA's Initial Proposals⁴³ for the NERL air traffic services licence and the DfT licence terms consultation.⁴⁴ These include:

- the DfT's Strategic Objectives⁴⁵
- the CAA's draft guidance for NERL's provision of the UKADS and UKACS⁴⁶; and
- the CAA's draft requirements and associated guidance for NERL's provision of the UKACS⁴⁷.

These documents provide more detail on NERL's obligations and we propose that they are referred to in NERL's Licence^{**}. Likewise, through the Licence proposals^{**}, we will propose that NERL is responsible for a strategic delivery plan, the Advisory Board (terms of reference and formation) and a stakeholder engagement plan. To enable and fund NERL to produce an airspace change proposal as UKADS provider, NERL's licence will be subject to separate DfT and CAA consultations on the licence terms and conditions respectively^{**}. We will propose NERL's provision of the UKADS, including regular reporting and information provision, is subject to oversight* by the DfT/CAA as co-sponsors through the existing governance mechanism in the Airspace Modernisation Strategy CAP 1711.⁴⁸ Like all airspace change proposals, the airspace change proposal developed by NERL, as the UKADS provider, must take account of the CAA's Airspace Modernisation Strategy.

A5 The **top section** outlines other aspects of the airspace legal and policy framework that affect all airspace change proposals: the Secretary of State's Air Navigation Directions and Air Navigation Guidance⁴⁹ to the CAA, revisions to which will be consulted on shortly, that together with section 70 of the Transport

⁴³ [CAP 3121 Initial proposals for modifying the Licence to support the implementation of a UK Airspace Design Service | UK Civil Aviation Authority](#)

⁴⁴ [UK airspace design service: modifications to NERL licence terms | Department for Transport](#)

⁴⁵ [Strategic Objectives - Airspace modernisation | Department for Transport](#)

⁴⁶ [Consultation on draft guidance for the UK Airspace Design and Coordination Services | UK Civil Aviation Authority](#)

⁴⁷ [Consultation on the requirements for the UK Airspace Coordination Service and associated guidance | UK Civil Aviation Authority](#)

⁴⁸ [CAP1711: Airspace Modernisation Strategy 2023–2040 Part 1: Strategic objectives and enablers | UK Civil Aviation Authority](#)

⁴⁹ [Changes to the air navigation directions and air navigation guidance | Department for Transport](#)

Act 2000⁵⁰ and other technical design policies govern the CAA's CAP 1616 airspace change process and guidance⁵¹ that all change sponsors must follow.

- A6 The **bottom section** outlines the planning regime. Airspace change proposals must enable the capacity permitted, within the conditions set, by planning permissions granted to the airports concerned. These are:
- the proposed Heathrow Expansion Planning Application Development Consent Order (DCO)⁵²; and
 - other currently proposed or actual airport DCOs (e.g. Gatwick or Luton)
- all of which are subject to the Planning Act 2008⁵³
- other airport planning permissions including section 106 conditions which are subject to the Town and Country Planning Act 1990.⁵⁴
- A7 In terms of government policy, a planning application in relation to Heathrow is additionally subject to the DfT's Airports National Policy Statement⁵⁵ (which the Government confirmed in October 2025 that it will review⁵⁶) while the other airports are subject to the DfT's "Making Best Use of Existing Runways".⁵⁷

Explanatory note supplementing the diagram

- A8 It is proposed that once NERL is tasked with provision of the UKADS and has the UKADS up and running, it will sponsor an airspace change proposal for the relevant airspace through the CAA's airspace change process. There will no longer be the multiple airspace change proposals sponsored by individual airports that formed a 'cluster' of the airspace change masterplan.
- A9 Various documents need to be consulted on, finalised and published before an airspace change proposal can be developed and proposed to the CAA for decision.

⁵⁰ [Transport Act 2000](#)

⁵¹ [Consultation on the airspace change process | UK Civil Aviation Authority](#)

⁵² [Proposed Heathrow Expansion Planning Application Development Consent Order \(DCO\) | Planning Inspectorate](#)

⁵³ [Planning Act 2008. The Planning and Infrastructure Bill - Parliamentary Bills - UK Parliament](#) is proposing amendments to the Planning Act 2008

⁵⁴ [Town and Country Planning Act 1990](#)

⁵⁵ [Airports National Policy Statement \(ANPS\) | Department for Transport](#)

⁵⁶ [Plans for Heathrow expansion accelerate as Transport Secretary unveils next steps | Department for Transport](#)

⁵⁷ [Making Best Use of Existing Runways | Department for Transport](#)