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Executive summary

1. From 17 November 2025 until 12 January 2026, the CAA ran an eight-week public consultation on draft requirements and associated guidance in respect of the provision by NATS (En Route) plc (NERL) of the UK Airspace Coordination Service (UKACS).¹
2. The consultation asked three questions, inviting a mixture of multiple-choice answers and free text. We had 47 responses, of which 32 came from local organisations such as community action groups or residents affected by aviation. Eight were from commercial industry. The others came from a range of other stakeholders. 74% of respondents were based in the South East.
3. We have considered the responses to the consultation. Taking these into account, the final requirements for the UKACS and associated guidance, which we are publishing as CAP 3220², includes the changes summarised below. We have also taken the opportunity to make any minor editorial changes (which are not listed below).

Monitor strategically important interdependent airspace changes needed and provide advice

4. We have included some additional text to support the definition of 'strategically important interdependent' airspace change proposals (see CAP 3220 paragraphs 2.4 and 2.5).
5. We have removed the requirement to obtain advice from the Advisory Board for the purpose of NERL's monitoring role (see CAP 3220, this has been removed from Requirement 1). It is still intended that NERL consult with relevant sponsors before providing their advice to the CAA and DfT on which proposals NERL considers are strategically important interdependent airspace change proposals (as defined).

Deliver cumulative assessment outputs

6. We have clarified the core purpose and requirements of the Cumulative Assessment Framework (CAF) in the final requirements and associated guidance (see CAP 3220 paragraph 2.9 and figures 2.1 and 2.2).

¹ CAP 3159 Airspace Modernisation: Consultation on the requirements for the UK Airspace Coordination Service and associated guidance www.caa.co.uk/cap3159

² CAP 3320 Airspace Modernisation: Requirements for the UK Airspace Coordination Service and associated guidance www.caa.co.uk/cap3220

7. We have included a requirement on NERL to provide Relevant Sponsors with appropriate guidance, as may be required, in order to aid cooperation (see CAP 3220 paragraphs 2.10 Requirement 2 (iii) and 2.12 Requirement 3 (iii)).
8. We have included a requirement for NERL to summarise and communicate the overall proposal for each cluster of strategically important interdependent airspace change proposals to help frame sponsor consultations (see CAP 3220 paragraph 2.10 Requirement 2 (iv)).

Deliver safety strategy outputs

9. We have included a requirement on NERL to provide Relevant Sponsors with appropriate guidance, as may be required, in order to aid cooperation (see paragraph 2.18 Requirement 4 (iii)).

Chapter 1

The consultation

Purpose of this document

- 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).³ The government also confirmed that NERL would continue to provide a coordination service for those strategically important interdependent airspace change proposals where the UKADS is not being provided (but that those airspace change proposals would continue to be sponsored by their existing change sponsor).
- 1.2 Between 17 November 2025 and 12 January 2026, the CAA consulted on CAP 3159, which included draft requirements for the UK Airspace Coordination Service (UKACS) and associated guidance.⁴
- 1.3 This document, CAP 3162, explains how the CAA has taken into account the responses to the consultation in a final version of the requirements and associated guidance, now published as CAP 3220 *Requirements for the UK Airspace Coordination Service and associated guidance*.⁵
- 1.4 The decisions in this document have been taken in light of the statutory duties, set out in sections 2 and 70 of the Transport Act 2000, applicable to the CAA's exercise of its air traffic services and air navigation functions. We consider the final requirements and associated guidance, published as CAP 3220, is consistent with our statutory duties.

³ You can read more about the background to the UKADS on the CAA's dedicated webpages www.caa.co.uk/ukads. This also includes links to past consultations on the UKADS concept and NERL licence modifications.

⁴ CAP 3159 Airspace Modernisation: Consultation on draft requirements for the UK Airspace Coordination Service and associated guidance <https://consultations.caa.co.uk/policy-development/draft-ukacs-requirements> We also published an associated consultation document, CAP 3158, seeking views on additional draft CAA guidance with which NERL should comply which applies to NERL's provision of both the UKADS and UKACS <https://consultations.caa.co.uk/policy-development/draft-ukads-ukacs-guidance>.

⁵ CAP 3220 Airspace Modernisation: Requirements for the UK Airspace Coordination Service and associated guidance www.caa.co.uk/cap3220.

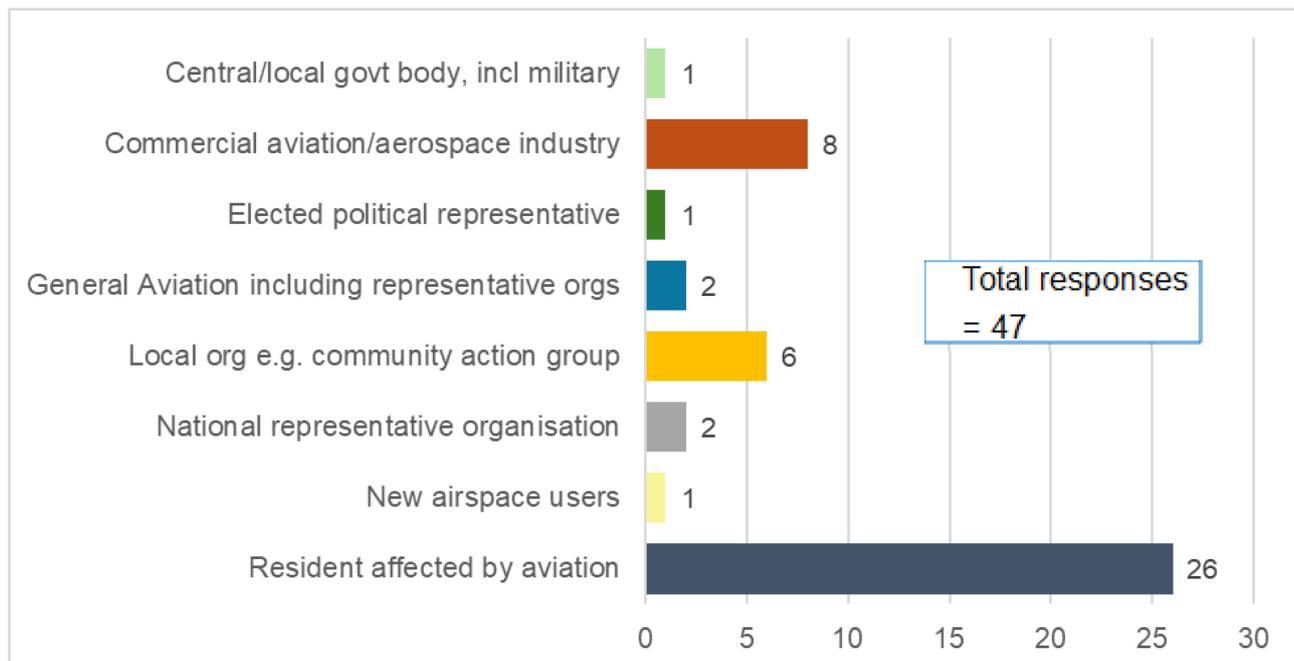
Content of the consultation

- 1.5 The draft requirements and associated guidance covered NERL's provision of the UKACS as well as the obligations on sponsors who are required to work and cooperate with NERL so that it can provide the UKACS efficiently and effectively. The consultation document sought views on:
- lessons learned
 - our proposals
 - a draft set of requirements and associated guidance. These were set out in Appendix A of the consultation document.
- 1.6 The consultation asked three questions, inviting a mixture of multiple-choice answers and free text.

Who responded to the consultation?

- 1.7 We received 49 responses, of which 2 were duplications. This makes the total number of responses that were analysed 47. We asked respondents to categorise themselves into one of 10 categories. We asked that a respondent falling in more than one category choose the one that was most relevant to them answering about airspace issues. The results are shown in Figure 1.1.

Figure 1.1: Responses to the engagement exercise by category of respondent



- 1.8 Of the 47 respondents:
- The greatest number, 26, were from residents affected by aviation.

- Eight responses were from the commercial aviation/aerospace industry, including trade associations; of which seven were from airports or air navigation service providers and one was from an airline.
- Six responses were from local organisations, for example a community action group, airport consultative committee, environment action group or other organisations promoting outdoor recreation in the local area.
- Two responses were from the General Aviation community, including one airfield and a representative organisation.
- Two responses were from national representative organisations (excluding General Aviation organisations and industry trade associations), for example non-governmental organisations.
- One response was received each from a Member of Parliament (MP), the Ministry of Defence (MoD) and a new user organisation.
- There were no responses in the ‘consultancy’ or ‘air passenger / shipper’ categories (which are therefore not shown in any of the tables or figures in this document).

1.9 Two respondents in the ‘Residents affected by aviation’ category appear to have submitted two responses each. The responses were answered identically in the multiple-choice responses and so we have removed duplicate responses for the multiple-choice analysis. We have included the full set of responses in the free-text field analysis.

1.10 A more detailed list of respondents appears at the end of this chapter.

Geographic spread of responses

1.11 Of the 47 responses, 35 (74%) identified themselves as resident or based in the South East, the next highest categories being South West, East of England and Scotland with two responses each (Table 1.1). We added a “non-UK” category which catered for an international new user organisation who wishes to be kept anonymous. There were no responses categorised as Northern Ireland, Wales, North East or Yorkshire and the Humber.

Table 1.1: Responses to the engagement exercise by geographic region

	South East	South West	East of England	East Midlands	West Midlands	North West	Scotland	Non-UK	Not answered
Central/local govt body, incl military	1								
Commercial aviation/aerospace industry	4		1		1	1	1		
Elected political representative	1								
General Aviation	1		1						
Local organisation e.g. action group	4	2							
National representative organisation	1			1					
New airspace users								1	
Resident affected by aviation	23						1		2
Total	35	2	2	1	1	1	2	1	2

Stakeholder engagement

- 1.12 To encourage a wide engagement with the consultation, on the day of publication in November 2025, the CAA invited views from approximately 2,100 individuals and organisations through direct emails and a further 10,200 through the CAA's Skywise alerts platform.
- 1.13 The UKADS project has been running since 2023 with periodic stakeholder engagement, including a public consultation on the UKADS concept in October 2024. We set up dedicated UKADS webpages to keep stakeholders up to date with developments.⁶ In parallel, for some years we have maintained webpages dedicated to our oversight of the development of the airspace change masterplan by the Airspace Change Organising Group.⁷ In September 2025, to explain the multiple strands of work underway relating to the proposed provision of UKADS and UKACS, we published CAP 3156 *Modernising the way we do airspace design: information relevant to the CAA autumn 2025 consultations concerning airspace design*.⁸ CAP 3156 'signposted' stakeholders of airspace

⁶ www.caa.co.uk/ukads including [Latest news about the UKADS | UK Civil Aviation Authority](#).

⁷ [Airspace change masterplan | UK Civil Aviation Authority](#)

⁸ www.caa.co.uk/cap3156

modernisation to changes that were planned, or to be consulted on, in autumn 2025, including this one.

List of respondents by category

Central or local government body including military (1 response)

MoD (DAATM)

Commercial aviation/aerospace industry including trade associations (8 responses)

NATS

Manchester Airports Group

Farnborough Airport

Four airports and one airline preferred to remain anonymous

Elected political representative, for example councillor or MP (1 response)

One MP preferred to remain anonymous

General Aviation, including representative organisations (2 responses)

One representative organisation preferred to remain anonymous

One airfield preferred to remain anonymous

Local organisation for example a community action group, airport consultative committee or forum (6 responses)

CAGNE (Communities Against Gatwick Noise Emissions)

HACAN (Heathrow Association for the Control of Aircraft Noise)

The Ramblers (Sussex Area)

One Airport Consultative Committee preferred to remain anonymous

Two environment action groups preferred to remain anonymous

National organisation (excluding General Aviation organisations and industry trade associations), for example non-governmental organisations (2 responses)

GATCO

ACOG (Airspace Change Organising Group)

New Airspace Users (1 response)

One organisation preferred to remain anonymous

Resident affected by aviation (26 responses)

26 individuals

Chapter 2

Consultation questions and analysis methodology

Overview

- 2.1 This chapter includes:
- a reminder of the three questions we asked in the consultation
 - the methodology we used to identify key themes from free-text responses to those three questions
 - how we handled responses submitted by email rather than our online consultation platform
 - how we handled material that was out of scope.

Consultation questions

- 2.2 The consultation asked three questions. They were in a multiple-choice format with space for supporting free-text comments giving views or supporting rationale. The questions were:
- Consultation question 1: Do you agree with the lessons learned?
 - Consultation question 2: Do you agree with the proposals?
 - Consultation question 3: Do you agree with the draft UKACS requirements and associated guidance?
- 2.3 The options for the multiple-choice questions 1, 2, 3 were:
- about right
 - minor modifications needed
 - major modifications needed
 - don't know.

Responses submitted by email

- 2.4 Of the 47 responses we received, 19 were submitted by email rather than through our consultation website. Of those 19 email-only submissions, four were not arranged in our question format and so gave no answer to individual questions. Therefore, they are necessarily shown as 'not answered' in our analysis of answers to the multiple-choice questions. We consider the points they raised in our qualitative analysis of free-text responses. Where a response

was arranged in our question format, we were able to analyse it in the same way as those submitted via the consultation website.

Methodology for analysing free-text responses

2.5 We read the responses in full, listing the topics, concerns, questions and comments raised within them. Each element of each response was arranged into themes associated with the relevant questions in the consultation document.

2.6 Some responses to the parallel consultations seeking views on:

- draft guidance for the UK Airspace Design and Coordination Services ⁹
- final proposals for NERL's air traffic services licence (the "Licence") ¹⁰

commented on issues relevant to this consultation. Where this occurred, we have taken these comments into account in our analysis.

Matters out of scope

2.7 The draft guidance in CAP 3159 did not relate to how NERL, as the UKADS provider, would develop an airspace change proposal. That is a matter for the CAA CAP 1616 airspace change process which was the subject of a separate consultation.¹¹ The CAA's CAP 1616 airspace change process¹² will continue to include opportunities for stakeholders to engage with NERL, as the UKADS provider and for them to be consulted about the proposal.

2.8 Our consultation set out clearly (at paragraph 1.12) that we were seeking views on the draft requirements and associated guidance for the UKACS, and that we were not seeking views on any of the following:

- specific airspace change proposals, past or present
- 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 airspace change process
- the CAA's CAP 1616 airspace change process, which was subject to a separate consultation by the CAA

⁹ www.caa.co.uk/CAP3158 and [Airspace modernisation: Consultation on draft guidance for the UK Airspace Design and Coordination Services - Civil Aviation Authority - Citizen Space](#)

¹⁰ [CAP3164 Economic Regulation of NERL: Final proposals for modifying the Licence to support the implementation of a UK Airspace Design Service | UK Civil Aviation Authority](#)

¹¹ CAP3157 Consultation on the airspace change process www.caa.co.uk/cap3157

¹² [Airspace change process | UK Civil Aviation Authority](#)

- government policy and any guidance given to the CAA by the Secretary of State.

2.9 Nevertheless, a number of responses from local organisations representing communities and from residents affected by aviation included free-text comments that were out of scope of the consultation. Of the 32 responses from local organisations representing communities and from residents affected by aviation, at least 24 used identical or near-identical text in their response including issues that were out of scope. They were considered out of scope because they were expressing concerns about:

- the environmental impacts of design choices of airspace change proposals, whether sponsored by NERL as UKADS provider or coordinated by NERL as UKACS provider
- government policy on aviation or economic growth
- the CAA's Airspace Modernisation Strategy

rather than the draft requirements and associated guidance on which we were consulting.

2.10 We have read all comments that were out of scope. We have published them where we had permission to do so, and where relevant we have drawn published responses to the attention of the relevant CAA department or the Department for Transport (DfT).

Chapter 3

Analysis of the responses

Introduction

- 3.1 In this chapter we consider in detail what the responses told us.
- 3.2 You can read individual responses, where we had permission to publish them, on our consultation website.¹³
- 3.3 This chapter includes:
- an analysis of responses to the three multiple-choice questions; although it should be noted that we do not treat the consultation results as a referendum
 - an analysis of free-text responses to all three questions
 - the areas where there was broad support
 - the key themes we identified from responses telling us that modifications to the draft requirements and associated guidance (Appendix A in the consultation document) were needed, which we have grouped under appropriate headings
 - direct quotes from responses, where we have permission to publish
 - our conclusions from this analysis and how we have taken this feedback into account in the final requirements document.

Question 1: Do you agree with the lessons learned?

Multiple-choice responses to question 1

- 3.4 Responses are shown in Figure 3.1 and Table 3.1 below.

¹³ [Airspace modernisation: Consultation on the requirements for a UK Airspace Coordination Service and associated guidance - Civil Aviation Authority - Citizen Space](#)

Figure 3.1: Multiple-choice responses to question 1 (agreement with lessons learned)

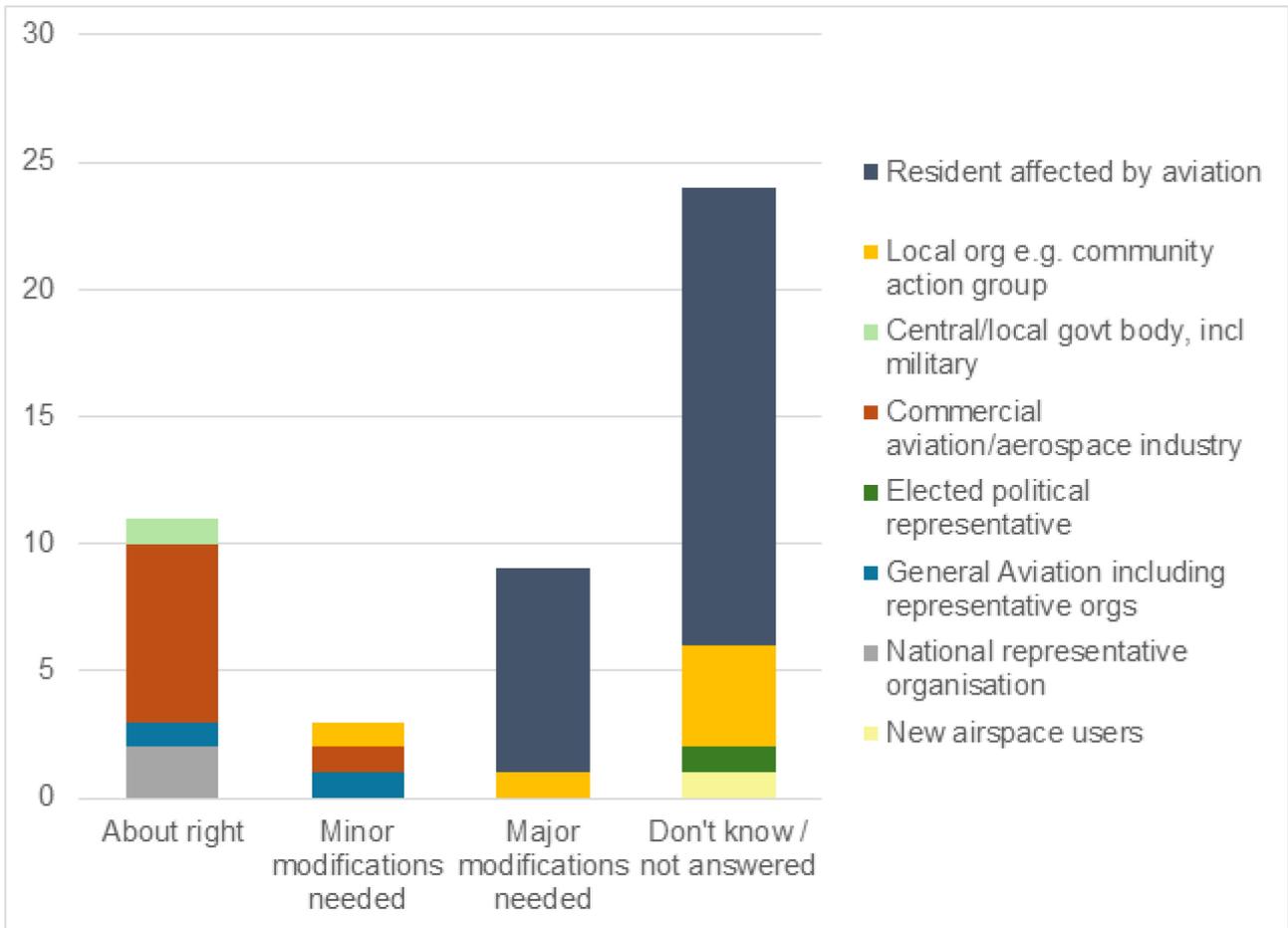


Table 3.1: Multiple-choice responses to question 1 (agreement with lessons learned)

	a	b	c	d	e	f	g
Respondent category	about right	minor mods needed	a + b	major mods needed	don't know/ not answered	total	<u>a + b</u> total
Resident affected by aviation			0	8	18	26	0%
Local org e.g. community action grp		1	1	1	4	6	17%
Central/local govt body, incl. military	1		1			1	100%
Commercial aviation industry	7	1	8			8	100%
Elected political representative			0		1	1	0%
General Aviation community	1	1	2			2	100%
National representative organisation	2		2			2	100%
New airspace users			0		1	1	0%
Total	11	3	14	9	24	47	30%

3.5 Of the 47 responses:

- 14 said it was about right, or only minor modifications were needed (30%)
- 9 said major modifications were needed (19%)
- 24 said they didn't know or chose not to answer the question (51%).

3.6 In terms of specific category of respondent:

- all the responses from commercial industry (eight), the General Aviation community (two), and national representative organisations (two) said that the guidance was about right or that only minor modifications were needed, as did the response from the Ministry of Defence and one from a local organisation (14 in all)
- the nine responses saying major modifications were needed mainly came from residents (eight of 26 total); the other one came from a local organisation (of six total)
- the 24 don't know/not answered mainly came from residents (18 of 26 total) and local organisations (four of eight total); with one each from an elected political representative and a new airspace user.

Free-text responses to question 1

3.7 A range of different categories of respondents expressed general support for the lessons learned outline in CAP3159 chapter 3. One stakeholder commented that replacing CAP2156a is a positive step, as it reduces regulatory burden and duplication. Manchester Airports Group suggested that the Public Engagement Exercise (PEX) has offered limited value to date and may divert attention away from the coordination needed to effectively deliver a cluster. NATS welcomed the flexibility available to seek to agree the use of alternative methodologies with the CAA where and when they consider appropriate.

3.8 **Issue:** HACAN said that the Community Engagement Panel set up by ACOG should be continued. **CAA response:** The Licence requires NERL to develop a stakeholder engagement plan that sets out written ways of working for its approach to engaging with key stakeholders with an interest in how NERL is providing the UKADS and UKACS. Engagement is a "catch-all" term for providing information to and developing relationships with stakeholders: this may be through mailshots, dedicated and up-to-date webpages, podcasts, vlogs or other electronic and social media.

3.9 **Issue:** CAGNE Gatwick and several residents suggested in duplicate or similar responses that the complexity of the consultation documentation was an issue and it was difficult to participate, as was the timing of the consultation – whilst those residents were focussing on the judicial review of the planning decision (Development Consent Order) regarding the second runway at Gatwick Airport. **CAA response:** We acknowledge that a number of separate documents necessary to establish the UKADS and UKACS were published within a short

period. This was necessary and proportionate to progress modernisation of the way we do airspace change within the time frame we committed to the Prime Minister to do.¹⁴ Additionally we considered it important that stakeholders were able to review the relevant documents “as a package” to assist understanding of how they are proposed to work together. In order to guide stakeholders through the context, we published CAP 3156 *Modernising the way we do airspace design: information relevant to the CAA autumn 2025 consultations concerning airspace design*¹⁵ and referenced this in the consultations. The timing of the publications was signposted in advance and where it made sense to do so the consultations were staggered, albeit the consultation periods overlapped for the reasons above.

Quote

“The CAA continues to produce complex documents for consultation leaving most of the public unable to participate effectively.” [response from CAGNE]

Quote

“We would fully agree with the lessons learnt set out in the document; when it was first envisaged, the concept of the Masterplan was for a directive, blueprint for change, which would guide future significant airspace changes at a national level. However, as the consultation document sets out, the reality has been that airspace changes are largely driven by commercial decisions taken by industry, and the Masterplan has morphed into capturing a snap-shot of these decisions rather than predicting them, with the consequence that the information can rapidly appear out of date as the proposals further evolve.” [response from ACOG]

Quote

“ACOG also established a Community Engagement Panel which provided an opportunity for key community stakeholders to provide feedback on proposed communications, review plans and offer input onto engagement experience of local communities. This should be continued under UKACS.” [response from HACAN]

¹⁴ www.caa.co.uk/cap3085a

¹⁵ www.caa.co.uk/cap3156

Lessons learned – outcome:

- The Community Engagement Panel set up by ACOG will not be continued. Instead, the Licence requires NERL to develop a stakeholder engagement plan that sets out written ways of working for its approach to engaging with key stakeholders with an interest in how NERL is providing the UKADS and UKACS.

Question 2: Do you agree with the proposals?

Multiple-choice responses to question 2

3.10 Responses are shown in Figure 3.2 and Table 3.2 below.

Figure 3.2: Multiple-choice responses to question 2 (agreement with the proposals)

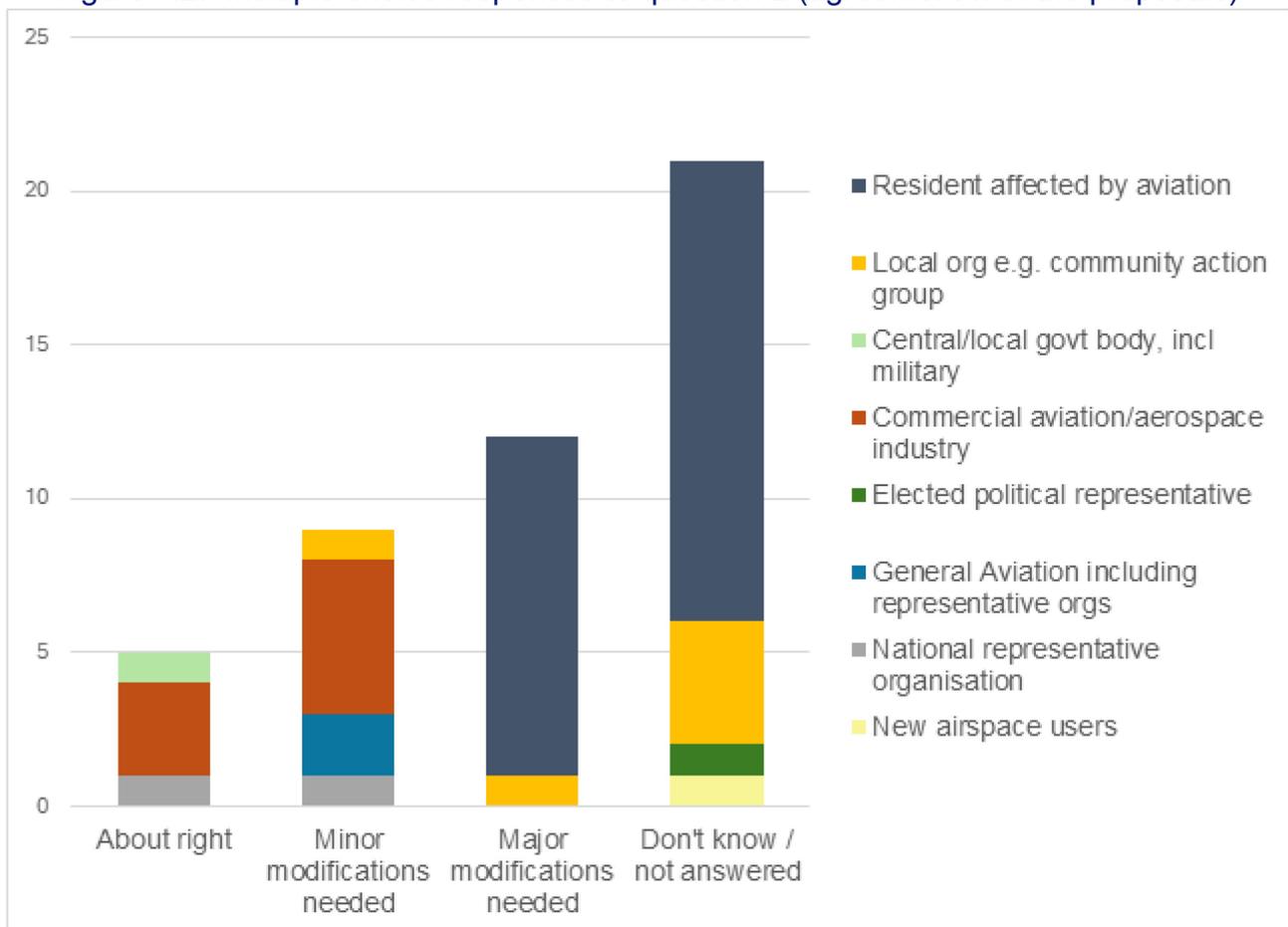


Table 3.2: Multiple-choice responses to question 2 (agreement with the proposals)

	a	b	c	d	e	f	g
Respondent category	about right	minor mods needed	a + b	major mods needed	don't know/ not answered	total	$\frac{a + b}{\text{total}}$
Resident affected by aviation			0	11	15	26	0%
Local org e.g. community action grp		1	1	1	4	6	17%
Central/local govt body, incl. military	1		1			1	100%
Commercial aviation industry	3	5	8			8	100%
Elected political representative			0		1	1	0%
General Aviation community		2	2			2	100%
National representative organisation	1	1	2			2	100%
New airspace users			0		1	1	0%
Total	5	9	14	12	21	47	30%

3.11 Of the 47 responses:

- 14 said it was about right or only minor modifications were needed (30%)
- 12 said major modifications were needed (26%)
- 21 said they didn't know or chose not to answer the question (45%).

3.12 In terms of specific category of respondent:

- all the responses from commercial industry (eight), the General Aviation community (two), and national representative organisations (two) said that the guidance was about right or that only minor modifications were needed, as did the response from the Ministry of Defence and one from a local organisation (14 in all)
- the 12 responses saying major modifications were needed mainly came from residents (11 of 26 total); the other one came from a local organisation (of six total)
- the 21 don't know/not answered mainly came from residents (15 of 26 total) and local organisations (four of eight total); with one each from an elected political representative and a new airspace user.

Free-text responses to question 2

- 3.13 A range of different categories of respondents expressed general support for the proposals, with a number of stakeholders citing improved agility and a reduction in unnecessary delays.
- 3.14 **Issue:** Some residents felt that independent oversight of NERL is necessary, along with stronger community representation within the governance structure. They also reiterated that effective engagement remains essential. One General Aviation organisation suggested that the general aviation engagement that ACOG had undertaken should continue. **CAA response:** The oversight of NERL is out of scope of this document. Please see CAP 3161 *Airspace Modernisation: Outcome of the consultation on draft guidance for the UK Airspace Design and Coordination Services*,¹⁶ CAP 3219 *Airspace Modernisation: Guidance for the UK Airspace Design and Coordination Services*¹⁷ and CAP 3225 *Economic Regulation of NERL: Decision to modify NERL's Licence to support the implementation of a UK Airspace Design Service*¹⁸ for further information on the oversight and governance of NERL including stakeholder engagement plans.
- 3.15 **Issue:** A number of residents raised concerns with the proposed removal of the Public Engagement Exercise (PEX) currently undertaken by ACOG but also appeared to suggest that this would result in moving public consultation later in the CAP1616 process. HACAN wanted to keep and repeat the PEX. **CAA response:** As explained in our consultation (CAP 3159), the timing of the PEX and the limited amount of detail that the ACOG has been able to include at that point in the process has caused confusion and frustration. 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. This 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.
- 3.16 **Issue:** Several stakeholders across different categories expressed a desire for a clear strategic delivery plan showing how it cascades into more detailed timelines, along with transparency around decision-making governance. **CAA response:** The strategic delivery plan and the governance of NERL is out of scope of this document. Please see CAP 3161 *Airspace Modernisation: Outcome of the consultation on draft guidance for the UK Airspace Design and*

¹⁶ www.caa.co.uk/cap3161

¹⁷ www.caa.co.uk/cap3219

¹⁸ www.caa.co.uk/cap3225

Coordination Services,¹⁹ CAP 3219 *Airspace Modernisation: Guidance for the UK Airspace Design and Coordination Services*²⁰ and CAP 3225 *Economic Regulation of NERL: Decision to modify NERL's Licence to support the implementation of a UK Airspace Design Service*²¹ for further information on the strategic delivery plan, the stakeholder engagement plan and the advisory board.

- 3.17 **Issue:** HACAN and one environmental action group who wished to remain anonymous suggested that the environmental assessments associated with the masterplan should be retained. **CAA response:** As a masterplan will no longer be produced there will be no plan to assess. However, each individual airspace change proposal will continue to assess a number of different environmental impacts including the impact of the airspace change proposed on habitats under the relevant habitat assessment regulations²² and this requirement will continue to be accounted for in the CAA's CAP 1616 airspace change process. We note the CAA continues to be required to take account of any guidance on environmental objectives which the Secretary of State has given the CAA. The guidance is currently set out in the Air Navigation Guidance 2017, and the DfT has recently consulted on amendments to that guidance.²³
- 3.18 **Issue:** One airline suggested that the definition of 'strategically important interdependent' requires greater clarity and should be supported by published metrics. In contrast, one airport suggested that sponsors should be included in discussions about which airspace change proposals are considered strategically important interdependent, as they will have the knowledge regarding potential interdependencies. **CAA response:** We do not consider using quantitative metrics to determine which airspace change proposals are strategically important interdependent airspace change proposals is appropriate. This is because determining which airspace change proposals require coordination varies depending on geography and the details of the specific design options and proposals. For example, a proposal by NERL to modernise upper airspace may require certain airports to change their airspace design or procedures. However, this will depend on the exact nature of the upper airspace proposals and the interdependencies that may exist. We have offered some further text in the final UKACS requirements and associated guidance (CAP 3220) to support this. In terms of sponsors being involved in discussions about which proposals are considered strategically important interdependent airspace change proposals, we consider that this is essential for the reasons above and therefore we have maintained, as proposed in the consultation, the requirement that NERL should

¹⁹ www.caa.co.uk/cap3161

²⁰ www.caa.co.uk/cap3219

²¹ www.caa.co.uk/cap3225

²² The Conservation of Species and Habitats Regulations 2017 ("Habitats Regulations")

²³ [Changes to the air navigation directions and air navigation guidance - GOV.UK](https://www.gov.uk/government/consultations/changes-to-the-air-navigation-directions-and-air-navigation-guidance)

provide the relevant monitoring advice to the CAA and DfT after “having engaged with all relevant sponsors” (see CAP 3220 paragraph 2.6 Requirement 1 (ii)).

- 3.19 **Issue:** Manchester Airports Group felt that NERL should take responsibility for the overall system when providing the UKACS and clearly communicate this to help frame sponsor CAP1616 consultations. **CAA response:** ACOG has performed this role, and we agree that this should continue under UKACS. We have therefore clarified this in the requirements and associated guidance (See CAP 3220 paragraph 2.10 Requirement 2 (iv)). This should also form part of NERL’s stakeholder engagement plan (see CAP 3219).
- 3.20 **Issue:** Two airports raised points regarding the cumulative analysis framework (CAF), stating that its requirements and timing were unclear. **CAA response:** We have clarified the timing and requirements in the requirements and associated guidance (see CAP 3220 paragraph 2.9 and figures 2.1 and 2.2). We have also included a requirement on NERL to provide relevant sponsors with appropriate guidance, as may be required, in order to aid cooperation.
- 3.21 **Issue:** NATS noted that the naming of the UKACS function implies a standalone unit, which they do not support. **CAA response:** Although the naming and organisation of the UKACS function is out of scope of this document, we disagree. UKACS is a service, one of the services that NERL’s licence as now amended requires it to provide. The Licence decision sets out the requirements for NERL to provide this service. Please see CAP 3225 for more information.

Quote

“Consolidating both airspace design and coordination within NERL, without restoring any form of independent oversight, risks further eroding public trust.”
[response from a resident]

Quote

“We think it would be prudent to expand the responsibility here to include aerodrome sponsors in identifying strategically important initiatives, the resulting potential conflicts and interdependencies and jointly build the advice to be presented to programme sponsors.” [response from an airport]

Proposals – outcome:

- We have included some additional text to support the definition of ‘strategically important interdependent’ airspace change proposals (see CAP 3220 paragraphs 2.4 and 2.5). It is still intended that NERL consult with relevant sponsors before providing their advice on which are considered strategically important interdependent airspace change proposals.
- We have included a requirement for NERL to take responsibility for communicating the overall system design to help frame sponsor consultations (see CAP 3220 paragraph 2.10 Requirement 2 (iv)).
- We have clarified the requirements and timing of the CAF (see CAP 3220 paragraph 2.9 and figures 2.1 and 2.2).

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

Multiple-choice responses to question 3

3.22 The outcome is shown in Figure 3.3 and Table 3.3 below.

3.23 Of the 47 responses:

- 13 said it was about right, or only minor modifications were needed (28%)
- 13 said major modifications were needed (28%)
- 21 said they didn’t know or chose not to answer the question (45%).

3.24 In terms of specific category of respondent:

- all the responses from commercial industry (eight) and national representative organisations (two) said that the guidance was about right or that only minor modifications were needed, as did the response from the Ministry of Defence, one from a local organisation and one from the General Aviation community (13 in all)
- the 13 responses saying major modifications were needed mainly came from residents (11 of 26 total); the other two came from a local organisation (of six total)
- the 21 don’t know/not answered mainly came from residents (15 of 26 total) and local organisations (three of six total); with one each from an elected political representative, the General Aviation community and a new airspace user.

Figure 3.3: Multiple-choice responses to question 3 (agreement with draft UKACS requirements and associated guidance)

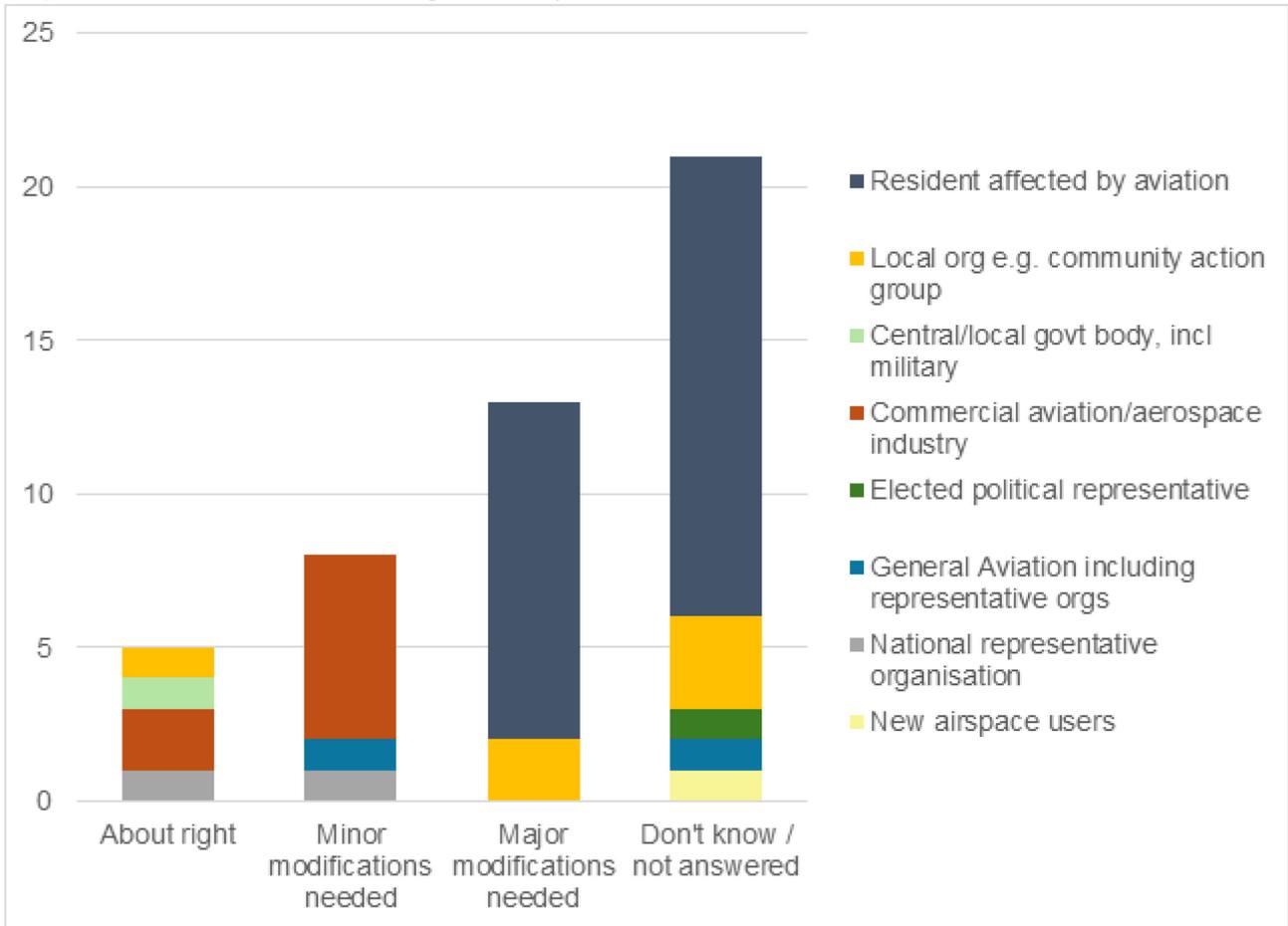


Table 3.3: Multiple-choice responses to question 3 (agreement with draft UKACS requirements and associated guidance)

	a	b	c	d	e	f	g
Respondent category	about right	minor mods needed	a + b	major mods needed	don't know/ not answered	total	<u>a + b</u> total
Resident affected by aviation			0	11	15	26	0%
Local org e.g. community action grp	1		1	2	3	6	17%
Central/local govt body, incl. military	1		1			1	100%
Commercial aviation industry	2	6	8			8	100%
Elected political representative			0		1	1	0%
General Aviation community		1	1		1	2	50%
National representative organisation	1	1	2			2	100%
New airspace users			0		1	1	0%
Total	5	8	13	13	21	47	28%

- 3.25 A range of different categories of respondent expressed general support for the resulting requirements and guidance with limited comments.
- 3.26 **Issue:** Some stakeholders felt the DfT should have clear mechanisms for intervention if Relevant Sponsors were not making sufficient progress, such as co-sponsor escalation and/or the use of Air Traffic Management and Unmanned Aircraft (ATMUA) powers. **CAA response:** This is already reflected in the AMS governance structure which will be updated to include NERL's new services and licence obligations.²⁴
- 3.27 **Issue:** NATS and Farnborough Airport disagreed with the proposal for the Advisory Board to provide UKACS with advice on which are considered strategically important interdependent airspace change proposals. **CAA response:** We agree that NERL is best placed to advise on which proposals are considered strategically important airspace change proposals, having consulted with relevant sponsors. This is because determining which airspace change proposals require coordination depends on geography and the specific details of the proposals. The Advisory Board is not the appropriate forum for discussing the details of individual airspace change proposals and therefore on reflection the requirement to obtain advice from the Advisory Board for this purpose has been removed (see CAP 3220, this has been removed from Requirement 1).
- 3.28 **Issue:** Two respondents repeated their suggestion for greater clarity around the definition and criteria for 'strategically important interdependent' airspace change proposals including some quantitative metrics. **CAA response:** We have addressed our response to this feedback in paragraph 3.18 above.
- 3.29 **Issue:** Manchester Airports Group suggested that UKACS should play a more active role in cascading guidance and policy updates and should provide sponsors with additional information on safety strategy. **CAA response:** We agree with this sentiment. We have therefore included a requirement for NERL to provide appropriate guidance to aid cooperation (see CAP 3220 paragraphs 2.10 Requirement 2(iii), para 2.12 Requirement 3(iii) and para 2.18 Requirement 4(iii)).
- 3.30 **Issue:** One airport suggested that the requirements of the CAF should specifically include trade off decisions and reporting of trade-offs. **CAA response:** We agree that this is a core purpose of the CAF and have reflected this in the requirements and associated guidance (see CAP 3220 paragraph 2.9).
- 3.31 **Issue:** One airport suggested that clarity on migration to the new process was required. **CAA response:** Once the licence modifications come into effect the obligation to create ACOG as a separate unit and develop a masterplan will have

²⁴ See [Appendix A of CAP1711](#) and [AMS governance and progress reports | UK Civil Aviation Authority](#)

been removed. All clusters that are subject to coordination by the UKACS will transition to the requirements and guidance of CAP 3220 (as well as the guidance of CAP 3219) on that day (CAP 2156a/b and its requirements having been withdrawn). Further communications and guidance will be provided to relevant sponsors in due course.

- 3.32 **Issue:** CAGNE Gatwick and many residents did not support the “removal of SEA Regulations”. **CAA response:** We have addressed our response to this feedback in paragraph 3.17 above.

Quote

“Agree, but no requirement for action is stated if NERL informs CAA/DFT that sufficient progress is not being made in accordance with the coordinated timetable, this should be added” [response from an airport]

Quote

“NATS does not believe it requires advice from an Advisory Board to comply with this requirement” [response from NATS]

Quote

“The obligation for NERL to seek advice from the Advisory Board however is less clear – how would this work as the Advisory Board is not decision making? Is the word advice appropriate? More information is needed” [response from Farnborough Airport]

UKACS requirements and associated guidance – outcome:

- We have removed the requirement to obtain advice from the Advisory Board for the purpose of NERL’s monitoring role (see CAP3220, this has been removed from Requirement 1).
- We have included further text to support the definition of ‘strategically important interdependent’ airspace change proposals (see CAP 3220 paragraphs 2.4 and 2.5).
- We have included a requirement on NERL to provide Relevant Sponsors with appropriate guidance, as may be required, in order to aid cooperation (see CAP 3220 paragraphs 2.10 Requirement 2(iii), para 2.12 Requirement 3(iii) and para 2.18 Requirement 4(iii)).
- We have reflected the core purpose of the CAF in the requirements and associated guidance (see CAP 3220 paragraph 2.9).