



# UK CAA response to the Department for Transport consultation on changes to the Air Navigation Directions and Air Navigation Guidance

**CAP 3209**

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## Key points

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1. The UK CAA is the UK's aviation regulator. Airspace is a national asset which provides social, economic and other benefits to the UK. The Government directs the CAA to carry out functions to oversee the planning and management of UK airspace and Parliament has set out a range of duties for the CAA to achieve. This legislation allows the Government to set out in directions and statutory guidance how the CAA should fulfil these functions, including how the CAA should apply its discretion in balancing the sometimes competing objectives.
2. The proposed directions and statutory guidance envisaged by the relevant legislation together set out the Government's priorities for this national asset, and how the CAA's discharge of its airspace functions should contribute to them. **The CAA therefore welcomes the clarity that is set out in the Department for Transport's proposed revisions to the Air Navigation Directions and the statutory guidance in the Air Navigation Guidance on how we should discharge our airspace functions, and on how we should exercise our regulatory discretion.**<sup>1</sup> In our view, this clarity will better enable the UK to meet its airspace modernisation goals, including contributing to the Government's growth agenda and other policy objectives. It will also help us to write CAA procedures that aim to expedite airspace change proposals as directed in the proposed Direction 4.2(a).
3. The fundamental decisions about airport infrastructure and the balance between different outcomes, including the growth of the sector and its environmental impact, are properly matters for the statutory planning process (including in this case airspace-specific planning decisions and the Airports National Policy Statement) and broad policy set by an elected government. This sets the framework within which airspace designs from airspace change sponsors can be assessed and the CAA makes airspace regulatory decisions.
4. The combination of that planning process and the policy set out in the Air Navigation Guidance will, the CAA believes, give greater regulatory certainty that will allow the mainly privately financed UK aviation sector to invest further in airspace modernisation. At the same time, it will continue to ensure that the airspace change process is transparent and evidence-based, and that all stakeholders will continue to have their say in proposed changes. This will make it more likely that the UK's policy goals for airspace modernisation, set out in the

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<sup>1</sup> [Changes to the air navigation directions and air navigation guidance - GOV.UK](#)

Airspace Modernisation Strategy<sup>2</sup>, and the aviation-related aspects of the Government's policy agenda for the UK, including economic growth and new runway capacity, can be achieved.

5. To further the UK's Airspace Modernisation Strategy, we are working with the Department in:
  - establishing, and appointing a provider of, a UK Airspace Design Service (UKADS) to accelerate and enhance the airspace changes that are vital to achieving modernisation
  - enabling two trials using remotely piloted drones beyond visual line of sight to demonstrate scalable operations
  - consulting on improvements to the effectiveness and proportionality of our process for changing airspace, while retaining a transparent process based on evidence and in which stakeholders can continue to have their say on proposed changes.
6. The Government's proposed revisions to the Air Navigation Guidance and the Air Navigation Directions will help bring these changes about. The CAA is separately consulting on potential changes to our CAP 1616 airspace change process<sup>3</sup> that will support the effective delivery of key elements of the airspace modernisation programme. The airspace change process in turn is derived from the Air Navigation Directions and informed by the Air Navigation Guidance.
7. We welcome the Secretary of State's clear environmental objectives for the CAA when carrying out its airspace functions. We note that these objectives have informed and resulted in the proposed Airspace Design Priorities and we welcome this clarity. We also welcome that those environmental objectives and the associated proposed guidance take into account all the aims and objectives of government policy for or related to aviation, and that this is collated into the draft Air Navigation Guidance. We will use the draft Air Navigation Guidance as guidance on how to comply with and give effect to our statutory duties set out in the legislation.
8. In terms of migration to new guidance, it is important that there is no ambiguity as to whether it is the current guidance or any revised guidance that applies to a

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<sup>2</sup> [Airspace Modernisation Strategy | UK Civil Aviation Authority](#) The strategic objectives of the Airspace Modernisation Strategy are:

- as a priority, maintaining and, where possible, improving the UK's high levels of aviation **safety**
- **integration** of diverse users
- **simplification**, reducing complexity and improving efficiency
- applying **environmental sustainability** as an overarching principle through all airspace modernisation activities.

<sup>3</sup> [Airspace change process | UK Civil Aviation Authority](#)

given airspace change proposal, because this drives many of the requirements in the CAA's airspace change process. Accordingly, any revised airspace change process must and will be applicable at the same time, and to the same airspace change proposals, as any revised Air Navigation Guidance.

9. We would ask the Government to further clarify its guidance to the CAA on how to apply non-aviation law and policy to our own processes, procedures and decisions relating to proposals for changes to airspace design. The CAA agrees with the consultation document's reasoning that the impact of aviation activity on habitats, biodiversity, national parks and sites of special scientific interest are rightly considered by the planning decisions that enable an airport to be built and the conditions placed on its operations. Environmental legislation that is not aviation-specific<sup>4</sup>, when applied to airspace change decisions, requires us to add procedural steps to our airspace change process. To date, this has had no identifiable beneficial impact on the UK's environment, but has created a regulatory workload for the sponsors of airspace change and substantial associated costs, both for regulators and for airspace change sponsors.

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<sup>4</sup> Please see page 14 of this response document for examples.

# Draft Air Navigation Guidance – CAA response

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## General comments

10. The UK CAA would like to make the following comments about the draft Air Navigation Guidance (ANG). These comments aim to further clarify the intent behind the proposed changes to the ANG. The ANG is provided for by section 70 of the Transport Act 2000. We will routinely follow it and only not do so if there is a good reason not to.
11. Overall, **the UK CAA welcomes the clarity in the draft ANG and the regulatory certainty this will provide on the airspace change decisions the CAA will likely make**, while retaining an evidence-based and transparent process in which all stakeholders can have their views taken into account.
12. For example, on page 6, the draft guidance states: “The Secretary of State has provided this Guidance to update and bring together all elements of government policy<sup>5</sup> and guidance likely to be relevant to the CAA’s exercise of its airspace functions.” We would like to acknowledge how important this approach is for regulatory clarity, certainty for stakeholders about regulatory decisions, and consequently encouraging investment in the aviation sector, including new runway capacity. It will also help us to write CAA procedures that aim to expedite airspace change proposals as directed in the proposed Direction 4.2(a).
13. We have numbered the draft ANG paragraphs from 1 to 84 for clarity when referring in our response to specific paragraphs in the draft ANG (which for convenience we have reproduced with paragraph numbers at Appendix A). We advise that chapters (or sections) and paragraphs in the final guidance should be numbered, in order to allow for easy and unambiguous reference to the different elements of the guidance in CAA processes and regulatory decisions – so that our regulatory decisions can be easily understood by those affected by them.
14. We have arranged our response by heading, in the same order as the Department’s covering AND/ANG consultation document.<sup>6</sup> For each heading, we have referenced the consultation question numbers in accordance with Annex A to the consultation document. We have, however, not responded to all of the questions individually. This is because some questions either do not apply to the CAA, are very specific, or fall outside of the CAA’s remit.

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<sup>5</sup> We understand this to include the [Overarching aviation noise policy - GOV.UK](#).

<sup>6</sup> [Changes to the air navigation directions and air navigation guidance - GOV.UK](#)

## Migration to the new guidance and implications for airspace change proposals currently in progress (questions 1 and 2)

15. We welcome this section in the draft ANG. **It is important that there is no ambiguity as to whether it is the current ANG or any revised ANG that applies to a given airspace change proposal.** The content of the ANG drives many of the requirements in the CAA’s airspace change process. Accordingly any revised CAA CAP 1616 must be applicable at the same time, and to the same airspace change proposals, as any revised ANG.
16. It is also necessary that a sponsor of an airspace change knows sufficiently in advance whether a revised version of the ANG will apply to it. The content of the ANG (as well as the associated CAA CAP 1616) has a direct impact on the objectives and content of proposed changes to airspace design.
17. We support the principle that airspace change proposals which are already well progressed in the CAA process should continue under the existing guidance. Requiring such proposals to restart or realign to revised guidance would introduce unnecessary cost, delay and inefficiency. In our view, once a sponsor has published its public consultation, the proposal has advanced to a stage where it is no longer appropriate to apply new guidance. Only those airspace changes that remain in the early stages of the process should be required to migrate to the updated guidance.
18. We also agree with the proposed guidance that the revised ANG will apply to any airspace change for London that, subject to consultation, will be progressed by NERL as the provider of the UK Airspace Design Service.
19. Consequently, and to align with the language used in the existing airspace change and airspace modernisation publications, we suggest that the final two bullets on page 19 should be reworded to say:
- “• Where an airspace change proposal designing a block of UK airspace ~~that~~ covers the area of airspace managed by more than one airport and is being **sponsored progressed** by the UK Airspace Design Service (UKADS) **provider.**” (This would better reflect that – subject to ongoing consultation – the UKADS is provided by NERL, who would be the sponsor of such an airspace change proposal.)
- “• Where **the sponsor of** an airspace change proposal **following has not completed the stage 2 gateway of** the CAA’s current CAP 1616 process **has not published the formal consultation on its proposal** at the date of **its** publication **of this guidance.**”
20. We consider that a proportionate approach would be to set a clear migration policy, which will be replicated in the way we apply the CAA’s CAP 1616

process, that will allow some advanced airspace change proposals to continue in the context of the former guidance and in accordance with the former process, but that requires less mature proposals to switch or migrate to the new guidance and associated process.

21. We agree with the proposed guidance that proposals should not be able to continue in the context of former guidance indefinitely, and we agree with the proposal for a long-stop date. However, we consider that the Government should adopt a longer long-stop date of July 2029, having regard to the need to balance the benefits of the new ANG against the costs that would be wasted by airspace change sponsors unable to complete the CAA process before the consultation's proposed July 2027 long-stop date (which would likely be less than a year after the new guidance is published). For the reasons above, we propose to adopt whatever long-stop date is ultimately included in any revised ANG for ascertaining the relevant CAP 1616 process requirements.

### Strategic prioritisation (questions 3 to 6)

22. **We welcome the clarity on the relationship between aviation planning policy and process, and airspace design policy and process. We welcome the Secretary of State's clear environmental objectives for the CAA when carrying out its airspace functions. We note that these objectives have informed and resulted in the proposed Airspace Design Priorities and we welcome this clarity. We also welcome the clear guidance on how those environmental objectives sit alongside other aims and objectives of government policy for aviation. We welcome the guidance on how to assess an airspace design against the Airspace Design Priorities. We will use this as guidance on how to comply with and give effect to our statutory duties set out in the legislation and any relevant planning conditions.**

#### Government's environmental objectives for the CAA when carrying out our airspace functions

23. We note that the Government has set five overall objectives. On page 6, (CAA-numbered) paragraph 11 of the draft ANG, we believe we understand what the second and third objectives mean, but we propose the following redrafting to replace those two bullets to make the objectives clearer:

- “• Minimise the adverse noise impact experienced on the ground from the use of airspace:
  - from individual flights, by maximising **vertical** flight efficiency
  - **through** an appropriate **lateral** distribution of noise impacts.”

#### Airspace Design Priorities

24. We welcome the clarity that the safety of any airspace design remains the overriding priority.

25. We welcome the recognition in (CAA-numbered) paragraph 28 that, together with safety as the first priority, a design must be viable. We understand the guidance to mean that a design must not only be “operationally flyable” but must also comply with UK law<sup>7</sup> and international obligations. Viability should also take into account the Airspace Modernisation Strategy, and be capable of incorporation into the performance of the wider aviation network design and airspace management referred to in the proposed Directions 3.1(a) and 3.1(g). If our understanding is correct, we would welcome this extra guidance in the ANG.
26. We welcome the clarity provided on the relationship between planning decisions and airspace change decisions. We understand that it is an important priority for the Government that multiple regulators do not consider and reconsider the same issues. We welcome priority 2 (and the guidance on it in the “overarching principles” at (CAA-numbered) paragraph 27). This clearly guides the CAA to make airspace change decisions that, to the extent it is safe to do so, enable the aviation activity that has been permitted by planning decisions (where applicable) and otherwise safely enable the maximum number of movements having regard to the forecasted demand at the relevant runway. We welcome the clarity that it is not for the CAA, when making airspace change decisions, to reconsider capacity decisions that are rightly made in the statutory planning process, but rather to enable them. Our understanding of the draft ANG is that provided that it is safe to do so, that is the CAA’s first priority when making airspace change decisions.
27. We note that on page 14 of the consultation document accompanying the draft ANG, the Government identified means by which airspace must safely enable planning decisions applicable to each UK airport. We note that two such means are replicated in the draft ANG at (CAA-numbered) paragraph 27. A third<sup>8</sup> is not, namely: *“Where a planning decision is outstanding, the CAA may use its judgement to allow an airspace design to assume the maximum level of capacity of the planning application.”* We would welcome this guidance being incorporated into this paragraph of the draft ANG. We understand it to be government policy, and in our view it would enable airspace modernisation to be progressed more quickly, enabling the benefits of modernisation to be realised more quickly.
28. In this regard, we note that the Government has published strategic objectives<sup>9</sup> to which it is proposed NERL must have due regard as provider of the proposed UK Airspace Design Service sponsoring an airspace design change for the London TMA. It is our understanding that the Government’s intention is to guide the CAA to require that the design for London airspace must accommodate a

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<sup>7</sup> For example, taking account of UK regulation (EU) 2019/123.

<sup>8</sup> There are four bullets in all on page 14, but the fourth is stating the consequence of the other three.

<sup>9</sup> [UKADS and UKACS licence obligations: strategic objectives - GOV.UK](#)

third runway at Heathrow, and was in part the reason for the wording of this third bullet in the covering consultation document.

29. We note that the Airspace Design Priorities apply to all “decisions which alter airspace design”. We recommend that in the case of temporary airspace changes and airspace trials, the ANG should guide the CAA to consider whether it is appropriate to apply the Airspace Design Priorities. Temporary airspace changes are by their nature addressing short-term operational situations and will not become permanent. The purpose of trials is often to test out new processes and procedures that will provide an evidence base to support future government policy development, or airspace management arrangements that will support delivery of the UK’s Airspace Modernisation Strategy.
30. We welcome the clarity on how we should take into account the noise and greenhouse gas emissions of aviation activity in our airspace change decisions. We acknowledge that these are important policy decisions and we consider that such broad policy choices about the relative weight of different policy objectives rightly sit in the planning process and should be made by an elected government on behalf of society and not by regulators. In our view, the draft ANG is clear and will inform airspace designers (working for the respective private airspace change sponsors) to develop from the outset designs for UK airspace that meet the Government’s policy objectives for this important national infrastructure. We will give effect to this guidance in our associated airspace change process and consequential airspace change decisions.
31. In our view, this clarity will reduce the time and cost of developing and progressing airspace change proposals, reducing the time it takes to modernise UK airspace and to deliver on the Government’s policy priorities, while retaining an evidence-based and transparent process in which all stakeholders can have their views taken into account. That said, we are interested to hear the views of airspace designers as to whether the guidance is clear or whether there is further clarity that they would welcome.
32. This clear statutory guidance – alongside an understanding by stakeholders that the CAA will follow that guidance unless there is a good reason not to – will **therefore provide stakeholders with greater certainty on the airspace change decisions the CAA will likely make and enable us to derive proportionate regulatory processes**, a key objective of the CAA’s own Regulatory Principles<sup>10</sup> and, we understand, a key priority for the Government. It will help us to write CAA procedures that aim to expedite airspace change proposals as directed in the proposed Direction 4.2(a).

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<sup>10</sup> [Our regulatory approach | UK Civil Aviation Authority](#)

33. We welcome guidance to the CAA (page 10 of the draft ANG) to collect only sufficient information that is necessary for the CAA to give effect to the Airspace Design Priorities and to understand whether the airspace design proposed meets government policy. We will carry this approach through to our revised airspace change process as part of fulfilling the commitment<sup>11</sup> the CAA made to the Prime Minister to consult on improvements to the effectiveness and proportionality of our process for changing airspace. (We have made a similar comment in the next section in respect of Direction 4.2 of the Air Navigation Directions.)
34. The final paragraph (CAA-numbered paragraph 39) of the draft ANG on page 10 states: “Where an airspace change is delivered through multiple deployments, this should include an appropriate degree of flexibility for the CAA to agree minor amendments to design after the first deployment has taken place, without requiring a new airspace change.” We welcome this recognition in the guidance that for overriding safety, but also some other reasons, some complex airspace change proposals need to be implemented in multiple, staged deployments. We welcome this outcome-focused wording which, without compromising the airspace change process itself (that ensures that those impacted are consulted appropriately), will give the CAA the flexibility where, subject to the overall objectives of the design remaining unchanged, it would be disproportionate to commence a new airspace change. We will reflect this in our revised CAP 1616 process.

### **Guidance on how to assess an airspace design against the Airspace Design Priorities (pages 11 to 12)**

35. We welcome this practical guidance on how to apply the Government’s airspace design priorities to airspace change proposals. We will follow and implement the final terms of the guidance in our revised CAP 1616 process.
36. We welcome guidance that we should identify any assessments already undertaken by other regulators to avoid duplication in regulatory processes. We will continue to look for these opportunities and make this clear in our revised CAP 1616 process.

### **Noise assessments metrics (CAA-numbered paragraphs 44 to 48)**

37. We welcome this guidance (pages 11 to 12 of the draft ANG). We will apply the final version of this guidance to our process and procedural requirements in our revised CAP 1616. We welcome guidance to the CAA to collect only sufficient information that is necessary for the CAA to give effect to the Airspace Design Priorities and to understand whether the airspace design proposed meets government policy. In our view this is helpful guidance on proportionality to our regulatory process that we will follow and apply in our revised CAP 1616

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<sup>11</sup> [CAP3085A: Letter from the office of the Chief Executive to the Prime Minister, January 2025: Supporting Growth | UK Civil Aviation Authority](#)

process. In our view this will reduce the regulatory cost of following our process, while at the same time collecting the data that we need to be properly informed on whether an airspace change proposal is delivering the Government's proposed Airspace Design Priorities, thus ensuring that we make evidence-based decisions (in accordance with our Regulatory Principles).

### **Flight efficiency assessments (CAA-numbered paragraphs 49 to 51)**

38. We welcome the proposed guidance on how the Government wants greenhouse gas emissions to be factored into our airspace change decisions (i.e. their place and characterisation in the Airspace Design Priorities) and why. For the reasons already discussed, we consider that this clarity will support airspace modernisation and delivery of other government objectives.
39. We also welcome the guidance on how we should assess these impacts and will apply the final version of this guidance in our revised CAP 1616 airspace change process. We consider the intention of the guidance to be as follows; we would welcome clarification in the final version of the ANG, and we will apply that guidance in our revised CAP 1616 guidance:
- our understanding is that the Government does not require sponsors to assess overall greenhouse gas emissions for the purpose of the airspace change process (because this will have been considered by any planning decision taken in respect of ground infrastructure at the time of any planning permission for the airport)
  - on that basis, our understanding is that the TAG workbook is not a requirement for greenhouse gas emissions (but remains a requirement for aviation noise)
  - for the London TMA, a TAG assessment against the 'baseline' is not possible because there is no three-runway baseline, and, as in the case of greenhouse gases, the planning process will already have considered the overall noise impact of a third runway. On that basis, if the sponsor produces more than one design, the TAG workbook will be used to compare the different design options. If only one design is produced, TAG will be used to assess it against the assumptions used in the planning process.
  - our understanding is that sponsors are required to assess fuel burn per flight, in order that sponsors can apply the fifth Airspace Design Priority "...prioritise flight efficiency where aircraft are at 4,000ft and above", so as to identify any remaining design possibilities that deliver that government priority
  - our understanding is that the CAA should require sponsors to demonstrate any net benefits **and costs** using a comparison with a defined baseline scenario; we recommend that (CAA-numbered) paragraph 51 is amended to clarify this

- (CAA-numbered) paragraph 51 proposes guidance that “When making airspace change decisions, the CAA should have regard only to the carbon emissions *of aircraft using airspace* and not of any other activity enabled or consequential on that aviation activity”. Our understanding is that this paragraph means (unless otherwise guided elsewhere in the ANG) that the CAA should nevertheless have regard to consequential impacts on other airspace users resulting from an airspace change proposal, such as those from rerouting around danger areas. These would be assessed in terms of flight efficiency, and not greenhouse gas emissions.

## Environmental Assessments Requirements (questions 7 to 13)

### Impact of non-aviation legislation on airspace change

40. The CAA agrees with the consultation document’s reasoning that the impact of aviation activity on habitats, biodiversity, national parks and sites of special scientific interest are rightly considered by the planning decisions that enable an airport to be built, and the conditions placed on its operations.
41. **We would ask the Government to further clarify its guidance to the CAA here in respect of how to apply non-aviation law and policy to our own processes, procedures and decisions relating to proposals for changes to airspace design.**
42. Environmental legislation that is not aviation-specific, but that applies to airspace change decisions, may require the CAA to add procedural steps to our airspace change process, which to date have had no identifiable beneficial impact on the UK’s environment, but which create a regulatory workload for the sponsors of airspace change. It is not airspace change decisions that determine whether aviation activity takes place. In our view these steps duplicate the consideration of planning decision-makers and add no material information to inform our airspace change decision. They also complicate and reduce the proportionality of our regulatory processes for changes in airspace design, for no discernible benefit to the environment. We therefore welcome the Government reviewing the impact of this area of regulation on airspace modernisation.
43. Where non-aviation-specific legislative requirements are already being applied to aviation infrastructure on the ground (building of airports, airport buildings and building or opening new runways), it is duplicative and of little benefit if those same requirements are also applied to the airspace design changes that are needed to facilitate the use of that infrastructure. We have first-hand experience of this. The CAA and airspace change sponsors have incurred cost in seeking to meet these requirements, yet the outputs add no obvious value to protecting the integrity of sites designated under this legislation, nor to wider environmental aims from a strategic perspective. We give more detail below.

44. The CAA notes recommendation 14 of the Corry review of April 2025<sup>12</sup>, proposing reform to remove duplication and overlap of regulations. We welcome any additional guidance addressing this issue in the ANG that helps to reduce the regulatory burden in respect of airspace modernisation and eliminates duplication of what is already required through land-planning or other processes. However, such additional guidance cannot override the fundamental requirements in law. The issue is therefore likely to require legislative change, and we encourage the Government to consider this.

**Question 7:** *Have you undertaken a specific environmental assessment, in relation to an airspace change, that was required by non-aviation-specific legislation in relation to an airspace change? If yes, please state what assessment.*

45. As part of the CAA's CAP 1616 airspace change process, prior to regulatory decision, Habitats Regulations Assessments (HRA) of airspace change proposals have been undertaken under the Conservation of Habitats and Species Regulations 2017 (which were not drafted with reference to airspace design or aviation operations; the explanatory memoranda and accompanying DEFRA guidance documentation do not indicate that it was intended that they apply to this activity).
46. The CAA also has a duty under section 11A of the National Parks and Access to Countryside Act 1949. The CAA must "seek to further" the purpose of the national parks (the National Park Duty).<sup>13</sup> The CAA also has a similar duty under section 85 of the Countryside and Rights of Way Act 2000 in relation to Areas of Outstanding Natural Beauty, recently renamed National Landscapes. Further, the CAA is subject to the general biodiversity objective under section 40 of the Natural Environment and Rural Communities Act 2006.<sup>14</sup>
47. With respect to the National Park Duty, National Landscapes, biodiversity and Sites of Special Scientific Interest (SSSI), the duties on the CAA are discharged by a requirement in CAP 1616 for an assessment of overflight of such areas under 7,000ft to be considered by airspace change sponsors when developing their proposals. As such, sponsors often use operational diagrams or overflight contours overlaid on maps identifying such areas to meet the requirements.

**Question 8:** *What was your experience of the specific environmental assessment?*

48. The experience of undertaking HRA in relation to airspace change has been resource-intensive, uncertain and disproportionately complex when set against the nature of the activity being assessed. In practice, the application of HRA has introduced a high degree of legal and procedural uncertainty due to the absence of a clear precedent of the application of the Habitats Regulations to decisions

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<sup>12</sup> [An independent review of Defra's regulatory landscape: foreword and executive summary - GOV.UK](#)

<sup>13</sup> This duty was strengthened by the Levelling Up and Regeneration Act 2023.

<sup>14</sup> This applies only to England, but devolved legislation extended it to Wales, Scotland and Northern Ireland.

on the impact that changes to airspace design have on habitats, which has never been tested in the UK or EU courts. This creates ongoing uncertainty for sponsors when carrying out their assessments and for the CAA in understanding and fulfilling our duties under the regulations.

49. The assessments have also been challenging to undertake due to limited scientific evidence on the impacts of aircraft noise and emissions on designated ecological sites and species. This has made it difficult to establish robust screening thresholds and has often necessitated precautionary approaches and additional consultation with Statutory Nature Conservation Bodies (SNCBs), who approach the issue from the perspective of their own statutory role and obligations, without an understanding of the nature of airspace design change or the CAA's role in airspace regulation. Differing expectations and approaches adopted by SNCBs has further complicated the process, creating delays, inconsistency and regulatory uncertainty.
50. Moreover, HRA requirements operate differently from aviation-specific environmental assessment requirements applied to airspace change, leading to internal misalignments, inconsistencies within the overall regulatory framework and uncertainty at the decision-making stage. HRA was not drafted with airspace design in mind and does not expressly reference airspace change. Its application has therefore led to significant adaptation of existing airspace change processes, resulting in additional procedural steps in the CAA's airspace change process, extended timelines and uncertainty for regulators and sponsors.
51. The CAA notes the Fingleton Nuclear Regulatory Review of 2025, and in particular recommendation 11, which proposes that the HRA regime is amended to require scientific evidence of harm to habitats for an HRA assessment to be required by a competent authority in respect of a "plan or project". We note the review's reasoning that this recommendation would lower the cost of regulatory processes in the nuclear sector, with little impact on habitats. We recommend that the Government considers whether a similar conclusion could be reached in relation to airspace infrastructure and changes to airspace design.

**Question 9:** *What, if anything, were the costs and benefits of doing the specific environmental assessment?*

52. The costs associated with undertaking the assessments referred to in paragraphs 45 to 50 above have been substantial, both for regulators and for airspace change sponsors, with limited evidence of corresponding environmental benefit. The principal impacts of undertaking these assessments have been regulatory complexity, increased costs, delays to airspace change delivery and the diversion of specialist resources away from other airspace modernisation environmental assessment activities.
53. At an individual airspace change proposal level, we understand that for HRA screening exercises (the first stage of the HRA requirements), an airspace

change sponsor would have incurred costs of approximately £15,000, with HRAs proceeding to appropriate assessment expected to cost around £35,000, excluding internal staff resources. If a full HRA were required, costs for an individual airspace change proposal could be of the order of £25,000 to £50,000, depending on the scope, and this may vary depending on whether mitigations are required. Specialist consultancy costs typically range from £500 to £750 per day. Where additional evidence is required, sponsors may be asked to prepare 'shadow' appropriate assessments, creating further expense.

54. In contrast, the environmental benefits of applying this non-aviation environmental legislation to airspace change to date appear limited. Approximately 35 airspace change proposals have completed the first stage, the screening exercise, since the introduction of the HRA requirements into CAP 1616, and none has required a full HRA, including appropriate assessment. This is because no impact on habitats could be identified after the application of the HRA screening exercises.
55. In several cases where proposals were delayed as a result of HRA requirements, no adverse impacts on habitats were ultimately identified. This raises questions as to whether the scale of cost and effort involved is proportionate to the environmental impact to habitats posed by airspace change proposals, particularly temporary, trial or 'Level 3' (low-impact) airspace changes. As a result, the environmental benefit of applying these non-aviation environmental legislations to airspace change has, in many instances, been unclear or negligible.
56. In our view these requirements add no additional information that could be relevant to the airspace change decision-making process. Taking into consideration:
- that these issues are rightly considered at land-planning development stage
  - that environmental characteristics which airspace design can impact (positively and negatively) (i.e. noise and flight efficiency) are assessed as part of the CAA's airspace change process, and informed by the Secretary of State's statutory guidance (i.e. the ANG)

our view is that the resources incurred might better be focused on noise and flight efficiency assessments than on habitats.

**Questions 10 to 13:** *In carrying out the specific environmental assessment, was sufficient guidance available? Overall, was the guidance helpful or not? Would further guidance in relation to how such requirements might be applied to airspace change be helpful? What content should the further guidance include?*

57. There is no airspace-specific guidance to support the effective and proportionate application of HRA requirements to airspace change. Much of the available guidance is derived from environmental legislation and policy frameworks

designed primarily for physical development and ground-based construction projects. As a result, it does not align well with the characteristics of airspace change, nor with the established aviation environmental assessment framework set out in the ANG and reflected in the CAA's CAP 1616. This has led to a layering of duplicative and sometimes conflicting regulatory requirements, increasing regulatory risk and uncertainty for all parties involved, creating delays to airspace modernisation and increasing costs, without demonstrably improving environmental outcomes.

58. As noted above, we welcome the intention in the draft ANG that it will bring together all elements of policy and guidance likely to be relevant to the exercise of the CAA's airspace functions. We consider that this will reduce regulatory uncertainty and encourage investment in airspace modernisation. If HRA is to continue to apply to airspace change, further bespoke guidance would be both necessary and beneficial. This should be contained in or aligned to and consistent with the statutory guidance in the ANG. In particular, guidance tailored specifically to airspace design and operation would support the efficient delivery of airspace modernisation with more proportionate, consistent and transparent decision-making in terms of trade-offs, and would help to reduce unnecessary duplication and delay, while ensuring legal robustness and compliance.
59. Noting that further guidance will not address the fundamental issues with the application of this legislation to airspace infrastructure change, nevertheless, in our view guidance should include:
- the altitude at which it can be assumed that there is no impact on habitats (taking into account the evidence obtained from screening assessments to date, referred to in this response)
  - defined thresholds (for example, by proposal type, permanence or scale of activity) to reflect the likelihood of significant environmental effect
  - clarity within the Airspace Design Priorities on the Government's policy on how assessment outcomes from non-aviation environmental legislation (such as HRA) should be balanced and weighted against the CAA's aviation- and airspace-related statutory duties and policy objectives, including safety, efficiency, growth, noise and climate considerations under section 70 of the Transport Act 2000
  - clarity within the Airspace Design Priorities on whether the Government wants the CAA to require sponsors to seek to avoid flying over SSSIs, National Parks, National Landscapes, for example below 4000ft (or alternative altitude the Government selects)
  - clarity on cumulative HRA assessment requirements, particularly for linked or interdependent airspace change proposals

- alignment with the planning system, including clarity on how HRAs undertaken as part of development consent processes can be relied upon to avoid duplication
- a commitment to keep the guidance up to date as the evidence base on airspace operational impacts on habitats widens over time
- clarity on which areas should be included in the assessment for designated landscapes, including whether these should include any designated Quiet Areas and other local ‘tranquil’ areas that are identified through community engagement
- what metrics should be used
- how to interpret ecological sensitivity and risk in an aviation operational context.

60. However, overall it is unclear whether guidance alone can address the concerns identified that the assessments required duplicate work already completed by other regulators and have no identifiable benefit on the environment. Addressing those issues may require the disapplication of HRA (and some other non-aviation environmental legislation) from the CAA’s air navigation functions by way of legislation.

#### **Guidance related to MoD, space and UAS**

61. We welcome the guidance exempting an airspace change proposal that facilitates spaceflight or rocket activities where the environmental impact is considered as part of a space licence application. This will reduce duplication, bring greater regulatory certainty and therefore reduce the regulatory burden.
62. On page 13, (CAA-numbered) paragraph 58 states that “The CAA is not required to take into account the impacts on the environment when considering airspace change proposals of the following kinds:” and specifies, in summary, MoD, drone trials and certain spaceflight proposals. We would like to make two observations:
- we understand this to mean that we would need to assess consequential impacts caused by other airspace users that result from MoD or spaceflight proposals (for example, where there is a consequential need for civil aircraft to reroute around a danger area), albeit it not for the specific UAS trials referred to in the guidance; we therefore suggest that the following sentence be added to paragraph 58: “However, the CAA should take into account the consequential effect of other aviation activity, for example routing around a danger area, when considering a permanent airspace change sponsored by the MoD or sponsored for the purpose of spaceflight activity.”

- notwithstanding the proposed guidance, we are still obliged to take into account impacts on European Protected sites under the Habitats Regulations and other legislation for protection of National Parks, SSSIs, protected landscapes etc.

### Noise Preferential Routes (questions 14 to 18)

63. We welcome the changes proposed in the consultation document and the inclusion of Direction 14.1(b) in the Air Navigation Directions (please see our comments in the next section) relating to information on track-keeping. The proposed changes will reduce duplication, bring greater regulatory certainty and therefore reduce the regulatory burden.
64. In our view an airspace change proposal that will be developed and decided in accordance with the proposed Airspace Design Priorities will ensure that government policy on the part that the noise impact of aviation plays in determining airspace design is properly applied and implemented.

### Airspace trials and temporary changes to structures (questions 19 to 21)

65. We welcome the changes proposed. We recommend some clarifications regarding the two paragraphs on page 15.
66. We recommend that the penultimate paragraph (CAA-numbered paragraph 63) is clarified so as not to imply that an airspace trial automatically leads to a permanent change. We suggest the paragraph be reworded:  
“After an airspace trial, the airspace should revert to its original state. **It is sometimes the case that the sponsor subsequently intends to implement a permanent change to the airspace design, and it is not practical to disestablish the trial procedure in the interim.** In such instances, the CAA may consider extending the trial while the airspace change process **for the permanent change** is being completed.”
67. We also recommend qualifying the final paragraph (CAA-numbered paragraph 63), because in some cases it may not be safe or otherwise in the public interest to end the trial early. We suggest the paragraph be reworded:  
“If the basis of the noise complaints suggests to the CAA that the sponsor failed to provide information properly before implementation or that the trial is not meeting its objectives, the CAA should **give careful consideration as to whether it is in the public interest** ~~seek~~ to end the trial as soon as it is safe and practicable to do so. **If, after consideration, the CAA decides not to end the trial, it should make this clear on the airspace change portal with supporting reasons.**”

## Environmental assessments for UAS BVLOS airspace users (question 22)

68. We welcome the changes proposed and agree with the reasons for making them. We note the Government's intention to consider evidence gathered over the short to medium term to help inform a government-wide policy on the impact of UAS operations and how any costs identified should be balanced against any socio-economic, environmental or other benefits of these operations to society.

## Call-in (questions 23 to 26)

69. We note and welcome that all reference to call-in has been removed from the draft ANG and that specific call-in guidance will be updated at a later date. Please see our comments on the draft Air Navigation Directions in the next section.

## Airspace design options (question 27)

70. We welcome the clarity that airspace change sponsors should design routes that reflect the proposed Airspace Design Priorities, but that when doing so, they have flexibility to consider the best design for that location. That design could include multiple routes off each runway end, which might enable planned respite, depending on the circumstances. We will reflect this proposed guidance in our revised CAP 1616 process.

## Consultation process and use of third parties (questions 28 and 29)

71. We welcome the changes proposed, in particular the less prescriptive guidance that will allow us to tailor the airspace change process to make consultation about airspace change appropriate to the circumstances. We also have the following observations about the proposed guidance on consultation.
72. On page 17, (CAA-numbered) paragraph 72 in the draft ANG states that "The CAA should encourage sponsors, where appropriate, to consider the use of bodies such as local authorities or representative bodies during consultations." The consultation document (pages 24 to 25) expands on that. We welcome this proposed guidance because it enables proportionate consultation processes in the right circumstances. Indeed, we note that this is not inconsistent with the current version of CAP 1616, which already requires sponsors to consider the use of intermediaries during the consultation to reach stakeholders. However, we recommend that paragraph 72 be clarified to read: "The CAA should encourage sponsors, where appropriate, to consider the use of **intermediaries, including local authorities, airport consultative committees and other representative bodies**, to reach local communities during their airspace change proposal consultations." We will reflect the published guidance in our CAP 1616 process.

73. We note that there remains a question with this proposal about how the local authorities and representative bodies charged with this additional responsibility would recover their costs for this activity, and whether sponsors should be encouraged to make some contribution. We would be interested to hear stakeholders' views on this proposal.

### Further opportunities for change (questions 30 to 44)

#### **Airspace information** (CAP 1618 *Airspace Information: transparency about airspace use and aircraft movements*)

74. The CAA welcomes the greater clarity in the draft ANG as to which parts are statutory guidance to the CAA and which parts are guidance to the CAA as to how we should guide others. We set out some comments below.
75. (CAA-numbered) paragraph 5 of the draft ANG says: "This document gives the CAA and sponsors guidance in relation to the CAA's responsibilities as set out in the Air Navigation Directions." We therefore recommend that (CAA-numbered) paragraphs 74, 75 and 77 of the draft ANG should be reworded to make reference to the guidance the CAA is directed to produce by the proposed Direction 14.1. This could be achieved by:
- adding to the beginning of paragraph 74: "In its guidance for airport operators, ANSPs, aircraft operators and pilots on transparency and provision of information, the CAA should stipulate that..."
  - adding to the beginning of paragraph 75: "The CAA's guidance should also stipulate that..."
  - adding to the beginning of the third sentence of paragraph 77: "**The CAA's guidance should stipulate that** airports and sponsors are therefore expected, where practical..."

## Draft Air Navigation Directions – CAA response

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76. The CAA would like to make the following comments about the draft of The Civil Aviation Authority (Air Navigation) Directions 2026:

77. **We welcome the clear CAA functions set out in the draft Directions.**

### **Direction 2 ‘Interpretation’**

78. Because the draft Directions propose that the duration of an airspace trial could normally be for up to three years (Direction 4.5(c)), we suggest that in the definition of “airspace trial” in Direction 2, the word “temporary” is replaced by “fixed period” to align with Direction 4.5(c) so that it would read:  
*“ [...] means changes to airspace design [...] for a fixed period for the purposes of- [...]”*

79. In the definition of “planned and permanent” the meaning would be clearer if “at the time” were hyphenated in the same way as “day-to-day” to read *“ [...] other than a day-to-day or at-the-time decision taken by [...]”*.

### **Direction 3 ‘Airspace design, use and management’**

80. **Direction 3.1:** We welcome the revised, broadened requirement for the CAA to develop and keep under review a national policy for UK airspace design (Direction 3.1(a)), which in practice would be a suite of various technical documents laying out different aspects of the applicable policy.

81. We also welcome the expanded scope of our existing requirement to keep all aspects of airspace design (and not solely the classification of airspace) under review (Direction 3.1(d)) and consider whether it should be amended (Direction 3.1(f)).

82. If so directed, we would aim to ensure that UK airspace design continues to deliver the outcomes that the approved design intended. We would not use this function to change airspace design, rather to ensure airspace design continues to deliver its existing objectives. If so directed, we would replace the current piecemeal approach of post-implementation review carried out by the sponsor (stage 7) of each airspace change proposal, and replace it with a system of continuous on-going review by the CAA. This would reduce the regulatory requirements on the sponsor thereby contributing to the commitment the CAA made to the Prime Minister we have already referred to above.

83. **Direction 3.1(a) and (e):** The 2023 Directions (Direction 3(c)) say that the CAA must “seek to ensure that the amount of controlled airspace is the minimum required to maintain a high standard of air safety and, **subject to** overriding national security or defence requirements, that the needs of all airspace users

are reflected on an equitable basis”. The draft 2026 Directions (Direction 3.1(e)) say: “where a formal review of UK airspace design is undertaken...[the CAA must] **consider** whether UK airspace design continues to meet national security and defence requirements and reflect sub-paragraphs (a). (Emphasis added.)

84. Our understanding is that there was no intention to change the existing policy in the 2023 Directions (“subject to” rather than “consider”). We therefore suggest that:
- **3.1(a)(ii)** is reworded to say: “(ii) seeks to ensure that the volume of controlled airspace is the minimum required to maintain a high standard of air safety and, **subject to overriding national security or defence requirements**, secure the most efficient use of airspace;” and
  - **3.1(e)** is reworded to say: “where a formal review of UK airspace design is undertaken, in consultation with the relevant airspace users, consider whether UK airspace design **reflects sub-paragraph (a)**;”.
85. **Direction 3.1(f)**: The word “review” in Direction 3.1(a) (the CAA must “keep under review a national policy for airspace design”) and in Direction 3.1(d) (the CAA must “regularly consider if UK airspace design should be reviewed”, potentially leading to the formal review referred to in 3.1(e)) causes an ambiguity in Direction 3.1(f) as to which review is being referred to. We understand that the intent is that 3.1(f) is referring to the formal review of UK airspace design in 3.1(e), rather than keeping under review a national policy in 3.1(a). If so, we suggest that this could be clarified by amending 3.1(f) to read: “following a **formal review under sub-paragraph (e)**, determine if...”
86. **Direction 3.2(b)**: “and any other relevant government aviation policy” is rather imprecise. It therefore does not give the CAA the certainty it needs to maintain and keep under review the Airspace Modernisation Strategy (Direction 3.2(a)). The CAA would recommend instead a specific reference to government policy on airport capacity, in particular making best use of existing runways<sup>15</sup> or any successor policy (as it is our understanding that this is the intention of this proposed direction).

#### **Direction 4 ‘Proposals for airspace design changes: procedure and guidance’**

87. **Direction 4.2**: We welcome the revisions that remove from the airspace change process potential duplications of information provision or consultation that have already been carried out for earlier planning processes. We will carry this approach through to our revised airspace change process as part of fulfilling the

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<sup>15</sup> *Beyond the horizon: the future of UK aviation, making best use of existing runways*, Department for Transport 2018. <https://www.gov.uk/government/publications/aviation-strategy-making-best-use-of-existing-runways>

commitment<sup>16</sup> the CAA made to the Prime Minister to consult on improvements to the effectiveness and proportionality of our process for changing airspace.

88. **Direction 4.3:** We welcome the revisions to the requirement for the CAA to publish a prioritisation principles document and what that document must take into account. We welcome the clarity that the CAA should organise its resources in a way that best delivers the government’s strategic objectives. That said, in 4.3(c) we would make the same request as above under Direction 3.2(b) for the term “relevant government aviation policy” to be made more specific to airport capacity (as we understand this is the intention of the proposed direction).

89. **Directions 4.4 and 4.5:** We welcome the extension of the usual maximum duration for a temporary airspace change or airspace trial. Extended timelines would:

- facilitate a reduction in requests for extensions
- limit the submission of multiple, repeat, subsequent airspace change proposals (avoiding duplication, improving regulatory efficiency, reducing costs and resources, etc.)
- facilitate operations that have been hampered by weather etc
- facilitate the collection of data that will inform policy development or consideration of associated airspace change proposals.

#### **Direction 5 ‘Secretary of State’s call-in and determination of a proposed permanent airspace change’**

90. We note the Government’s proposals to narrow the criteria for when the Secretary of State may “call-in” an airspace change proposal to solely where the proposed airspace change is of “strategic national importance” (Direction 5.13). We also note that the Government intends to publish guidance on what it means by “strategic national importance”. We note that the Secretary of State continues to give herself discretion, but is not required, to call in an airspace change proposal meeting the call-in criterion.

91. When considering which airspace change proposals the Secretary of State may want to retain discretion to call-in (i.e. when considering the content of the guidance on the meaning of the term ‘strategic national importance’ that you intend to publish later this year) we note the following.

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<sup>16</sup> [CAP3085A: Letter from the office of the Chief Executive to the Prime Minister, January 2025: Supporting Growth | UK Civil Aviation Authority](#)

92. The CAA has already adopted (and defined) the term “strategically important interdependent airspace change”. Subject to consultation<sup>17</sup>, the CAA is proposing to use that term in the NATS air traffic services licence when setting out which airspace change proposals will either be:
- (a) coordinated by the provider of the UK Airspace Coordination Service (UKACS), or
  - (b) sponsored by the provider of the UK Airspace Design Service (UKADS), constituting airspace changes at more than one airport.
93. If the Secretary of State intends the scope of her call-in discretion to be all airspace change proposals sponsored by UKADS or coordinated by UKACS, then we suggest that the call-in criterion is amended to use the same term, i.e. “strategically important interdependent airspace changes”.
94. If the Secretary of State intends the scope of her call-in discretion to be narrower, for example limited only to (b) above, we suggest that an alternative defined term is used in the Directions, such as “an airspace change proposal designing a block of UK airspace that covers the area of airspace managed by more than one airport and is being progressed by the UK Airspace Design Service” – wording used in (CAA-numbered) paragraph 83 of the draft ANG.
95. We look forward to working with the Department on an appropriate definition as part of the indicated updates to the Secretary of State’s call-in guidance (referred to in proposed Direction 5).<sup>18</sup>
96. **Direction 5 (Call-in timescales):** We welcome greater certainty on timescales. A lack of certainty on timescales could reduce the incentive to invest. As time limits are imposed on decision-making in the DCO process under the Airports NPS, it is sensible that decisions relating to the facilitating airspace change proposal for the infrastructure also work to firm timescales. (Although we set clear expectations for our own timescales for progressing an airspace change proposal, such timescales will remain indicative because they are dependent on our satisfaction with the supporting material submitted by the sponsor, and we must not be prevented from obtaining the information necessary to properly

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<sup>17</sup> [Airspace modernisation: Consultation on the requirements for a UK Airspace Coordination Service and associated guidance - Civil Aviation Authority - Citizen Space](#) See paragraph A9 of the draft requirements in CAP 3159, the consultation document, which defines “strategically important interdependent airspace change proposal” as meaning “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”. See also [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](#)

<sup>18</sup> [191031-guidance-to-the-civil-aviation-authority-on-call-in-2023.pdf](#) at paragraphs 10 and 11.

assess the proposal against our statutory duties and the Secretary of State's statutory guidance.)

97. We suggest that the second sentence of Direction 5.6 could be amended to make the timescales clearer, including that the Secretary of State's decision to call-in a proposal is optional irrespective of timescales, as stated in the first sentence of Direction 5.6: "Where the CAA has notified the Secretary of State of its view that a proposal meets the call-in criterion, the Secretary of State must consider **whether** to call in the proposal" (emphasis added). Our suggested amendment is: "**However, where** a call-in request is submitted more than six weeks after the airspace change proposal has been **submitted to (and received by) the CAA for a regulatory decision**, the Secretary of State can **decline to decide whether to call-in** ~~refuse to determine~~ the proposal even if the call-in criterion is met."
98. That said, in this respect we note that the ANG 2017 both has a shorter timescale and is more categorical: it states (paragraph 6.13) that the call-in request should be submitted in writing to the Department within **four** weeks of the proposal being submitted to the CAA, **otherwise it will not be considered** (emphasis added). We note that this has been relaxed and that page 22 of the consultation document states (with our full support) "consideration of whether to call in an ACP should be undertaken as quickly as possible and subject to clear timeframes". We note that the proposed Direction 4.2(a) gives the CAA's procedures an aim to expedite airspace change proposals and our understanding is that the Secretary of State has similar ambitions.
99. More fundamentally, the timescales explained in the consultation document, and those set out in the draft Directions, do not match. In the Directions there is no deadline specified for the Secretary of State to make a decision on whether to call-in a proposal or not. This runs contrary to the principle of greater certainty on timescales – as drafted, the Directions would allow the Secretary of State to leave a call-in request unanswered indefinitely. The timescales only apply where the Secretary of State has decided to call-in a proposal (Directions 5.9 and 5.10). Page 22 of the consultation document, in contrast, states that these deadlines (three months extendable for a further three months) apply to a **decision to call-in** (rather than determine, once called-in) a proposal, and that the Secretary of State makes a final decision "within three months of the date the CAA has provided its opinion on the proposal, or as soon as practical thereafter".
100. We therefore suggest that to match the consultation document:
- Direction 5.6 be amended as follows: "Where the CAA has notified the Secretary of State of its view that a proposal meets the call-in criterion, the Secretary of State must consider whether to call in the proposal **and notify the CAA of the Secretary of State's decision within three months.**" and

- Direction 5.9 be amended as follows:  
“5.9 The Secretary of State must—  
(a) determine the proposal within three months of the date of receipt of the reference under paragraph 5.8(b), **or as soon as practical thereafter**, and  
(b) notify the CAA of the Secretary of State’s determination.
- Direction 5.10 be deleted.

#### **Direction 6 ‘Proposed planned and permanent redistribution of air traffic’**

101. **Direction 6.1:** We support the changes to this Direction and the related Schedule 1, noting that there is a symbiotic relationship between the definition of a relevant PPR and the Airspace Design Priorities in the draft ANG.
102. **Direction 6.3:** We recommend that the term ‘its published strategy and plan for the use of UK airspace’ is replaced with “(i) the AMS and (ii) its procedures and guidance published under paragraph 4.1 (a) or (b) as appropriate”, to keep the terminology consistent with Direction 4.4.

#### **Direction 7 ‘Lower Airspace Service’**

103. We welcome the changes to this Direction to ensure that this work is included in the AMS ensuring its alignment with the wider portfolio of work, given the importance of this service.

#### **Direction 10 ‘Lost Communications’**

104. We welcome the changes to this Direction which will support the CAA in the oversight of lost comms, thereby ensuring the safety of UK airspace.

#### **Direction 11 ‘Relationship with the Secretary of State for Defence’**

105. Although there are only minor wording changes to this direction, the CAA’s view is that this should be expanded to ensure that the CAA is directed to provide a coordinated function for UK airspace as follows.
106. In exercising its delegated air navigation functions, the CAA is responsible to the Government for the design, development and management of UK airspace. We are increasingly required to work across government to ensure that the UK’s airspace – recognised as critical national infrastructure – is developed, protected and modernised in line with a strategic vision to support realisation of government objectives. We would welcome recognition of this reality in the Directions themselves.
107. While the current Directions formalise our relationship with the Ministry of Defence, there is a growing and demonstrable need for the CAA to hold similarly structured relationships with other government departments whose missions depend on, or could be significantly enhanced by, the safe and efficient use of airspace. Formal engagement with the Home Office would enable the CAA to support emerging technologies and surveillance capabilities that strengthen national security and public safety. Likewise, a directed relationship with the

Department of Health and Social Care would allow coordinated development of medical logistics corridors – such as drone-enabled delivery of time critical supplies – ensuring that such operations are integrated safely and effectively into the wider airspace system.

108. Directing us to establish these formal inter-departmental relationships would give clarity of roles, enable coherent planning, and ensure that the CAA can fully support government priorities while discharging its statutory responsibilities for the safe, efficient and equitable use of UK airspace.
109. We recommend that the other relevant Secretaries of State co-sign the Air Navigation Directions (in the same way that the Secretary of State for Defence has signed previous versions of the Directions) in order to give effect to the Joint and Integrated approach that our management of airspace demands.

**Direction 14 ‘Other functions relating to the environmental impact of the use of UK airspace’**

110. We welcome the changes to this Direction which bring greater clarity and will encourage greater transparency and provision of information about airspace usage through CAA guidance to airport operators, air navigation service providers, aircraft operators and pilots. We welcome the broadening of this definition to include new users and thereby supporting their integration in the aviation system.



Department  
for Transport

**APPENDIX A**  
CAA-NUMBERED VERSION  
OF THE DRAFT ANG

# Air Navigation Guidance

Proposed 2026 version

November 2025

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# Introduction

**1** Section 70(2) of the Transport Act 2000 requires the Civil Aviation Authority (CAA), when carrying out its air navigation functions, to take account of guidance on environmental objectives given to it by the Secretary of State. These functions are set out in the Air Navigation Directions 2026, made by the Secretary of State under sections 66(1), 68 and section 104(2) of the Transport Act 2000. This document, the Air Navigation Guidance 2026, is that guidance. It replaces the Air Navigation Guidance 2017 with effect from the date of publication<sup>19</sup>.

**2** The CAA's air navigation functions are conferred by Air Navigation Directions issued under sections 66(1), 68 and 104(2) of the Transport Act 2000, currently the Air Navigation Directions 2026. The functions include preparing the UK's Airspace Modernisation Strategy (AMS) in consultation with the Secretary of State, and approving individual changes to the UK's airspace design. In this Guidance the terms "air navigation functions" and "airspace functions" are used interchangeably.

**3** The Airspace Modernisation Strategy (AMS) was refreshed in 2023. The AMS takes into account the latest developments in innovation and technology, the continuing need for more efficient airspace design, the need to treat environmental sustainability as an overarching principle to be applied through all modernisation activities, and the requirement to meet the UK's international obligations in regard to airspace and navigation.

## **Aims of the Guidance**

**4** The Air Navigation Guidance 2026 sets out key guidance on environmental objectives for airspace modernisation to aid the CAA, as the UK's independent regulator, in determining how to balance the factors set out in section 70 of the Transport Act 2000. This includes:

- Setting out the Government's priorities for airspace redesign, through a set of principles called the "Airspace Design Priorities", explaining how environmental objectives sit alongside other aims and objectives of Government policy for aviation;

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<sup>19</sup> See paragraph below on how this Guidance applies to airspace changes which are already under way.

- Providing clarity on the relationship between airspace change and the planning process. Removing duplication means that airspace redesign can best realise the objectives of planning decisions within the scope of the requirements set by the planning process;
- Improving the UK's airspace change process to deliver the wider societal and economic benefits aviation can bring, including by new users such as unmanned aircraft systems;
- Strengthening the ability of the airspace change process to deliver Government priorities for UK airspace. This is achieved by providing a clear policy framework for decisions about the design and use of particular volumes of airspace;
- Enabling the CAA's airspace change process to meet the Government's policy to reduce regulatory burden wherever possible and appropriate to do so.

### **Applicability of the Guidance**

**5** This document gives the CAA and sponsors guidance in relation to the CAA's responsibilities as set out in the Air Navigation Directions.

**6** This guidance extends to all the CAA's air navigation functions. Government intends to keep this Guidance under review and update it when necessary to reflect development of policy in related areas.

**7** The CAA is expected to carry out its airspace and air navigation functions in an environmentally sensible manner, reflected in (among other provisions) section 70(2)(c) and (d) of the Transport Act 2000. This guidance, given to the CAA under section 70(2)(d), addresses environmental impacts of aircraft movements while acknowledging that there are other operational objectives which must also be met. These include the overriding need to maintain a high standard of safety, and the need to enhance and maximise the overall efficiency of the UK airspace network. The CAA, as the UK's independent regulator, is best placed to determine how to balance these factors as set out in section 70 of the Transport Act 2000.

**8** When there is conflict in the application of the factors set out in s.70(2) in the exercise of the CAA's air navigation functions, the CAA should take this guidance into account when applying section 70(3) to determine the most appropriate balance. This will help ensure that airspace designers have a clear understanding of the scope of environmental matters that individual airspace change proposals will need to address. This information should also be noted and taken into consideration by the aviation industry.

**9** This document is statutory guidance to the CAA in accordance with section 70(2) of the Transport Act 2000 and should be read alongside the Air Navigation Directions 2026.

**10** The Air Navigation Guidance has two purposes:

1. It sets out the Government's environmental objectives that the CAA must take into account in the exercise of its air navigation functions; and
2. It provides the CAA with guidance on how to achieve these objectives in the context of its duties under s. 70 of the Transport Act 2000.

**11** The objectives addressed in this Guidance are to:

- Minimise emissions of greenhouse gases from individual flights by maximising flight efficiency.
- Minimise the adverse noise impact on the ground from individual flights by maximising flight efficiency.
- Achieve an appropriate distribution of noise impacts experienced on the ground from the use of airspace.
- Ensure appropriate engagement with communities likely to be affected by the impacts of changes to the design and use of airspace.
- Ensure that environmental impacts of aviation are addressed at the appropriate point in the overall decision-making process by the appropriate decision maker, and wherever possible avoid duplication with other processes, such as planning processes.

**12** The chapters of this Guidance set out the impacts with which the Guidance is concerned and the way in which the CAA is expected to address them in carrying out its air navigation functions. This Guidance should be read and approached as a whole.

**13** The Secretary of State has provided this Guidance to update and bring together all elements of Government policy and guidance likely to be relevant to the CAA's exercise of its airspace functions.

**14** This Guidance will help ensure that airspace designers, and others with an interest in the CAA's airspace functions, have a clear understanding about the scope of the environmental matters that individual airspace change proposals will need to address.

### **New Airspace Users**

**15** Section 3 contains guidance on how the CAA is to consider the environmental impacts of certain proposed changes to airspace design (namely temporary airspace changes or airspace trials) to facilitate Unmanned Aircraft Systems (UAS) operations. The Government's objective with this guidance is to facilitate time-limited trial activity which furthers the Government policy of enabling new users to integrate into the existing aviation system, driving economic growth, and enables the opportunity for such activity to collect data. This will inform future Government policy, which will be reflected in future iterations of this Guidance.

### **Interpretation**

**16** Terms used in this Guidance have the same meaning as in the Transport Act 2000 and the Air Navigation Directions 2026 unless otherwise stated.

**17** In this Guidance, all altitude figures are expressed in feet above mean sea level (amsl). Please note, in some locations the actual height of the land maybe several hundred feet above sea level.

# 1. Strategic Direction and Prioritisation

## Strategic Context

**18** The Government believes that aviation can make a key contribution to the achievement of economic growth, increasing the prosperity of the whole country. The Government aims to facilitate the delivery of the economic benefits from aviation within its legally binding climate obligations.

**19** Recognising that the CAA's primary responsibility for UK airspace is to maintain a high level of safety, reflected in section 70(1) Transport Act 2000, the CAA is also to ensure that UK airspace is utilised in an efficient manner, which makes best use of the airspace available, as reflected in section 70(2)(a) of the Act. This ensures that the overall network and flights operate as effectively as possible, improving overall resilience of this nationally strategic important infrastructure. The Government considers that efficiency plays an important role in minimising the environmental impacts of aviation. Efficient flight patterns, achieved by appropriate airspace design, are likely to mean that aircraft are flown over shorter departure and arrival routes and, particularly in the case of arrivals, under lower power. This can enable a lower fuel burn, lower greenhouse gas emissions, and lower levels of noise experienced on the ground while aircraft are manoeuvring at low altitudes.

**20** The majority of aviation activity in the UK is enabled by airports and aerodromes. The CAA's airspace functions do not include policymaking or decision-taking about the scale, location or use of ground infrastructure. Policies and decisions are made about the construction and operation of airports and aerodromes by the planning process. Planning permissions and development consent orders (DCO) determine whether new infrastructure may be introduced in a particular location and may include conditions or requirements limiting the scale of operations.

**21** This means that changes to airspace design on their own will not lead to increased numbers of air traffic movements. The numbers of flights to, from and over the UK is set by a number of factors, including the planning process which governs airport runway or terminal capacity. The aim of the airspace change process is to deliver airspace improvements to enable the capacity or other limits set by any planning decision.

**22** The Government's policy is that airspace changes should seek to achieve the safest and most efficient use of airspace, taking into account the following constraints:

- Any limit on physical airport capacity.
- The number of flights permitted by planning decisions.
- Planning conditions such as noise preferential routes.
- Any limit on greenhouse gas emissions in planning conditions.

**23** The airspace change process is not intended as a mechanism to impose or revisit those limits, nor should it duplicate the assessment of impacts and community engagement that should take place as part of the planning process.

**24** The approach set by Government provides policy on the priorities for UK airspace, to inform how to best design and implement changes to airspace design. It is important that the impact of the use of airports, particularly the noise impact in the vicinity of airports, is taken into account by the Government when setting this policy, and this is reflected in the priorities set out below.

### **Policy Priorities for CAA Airspace Functions (the Airspace Design Priorities)**

**25** Aviation infrastructure cannot meet the Government objective of economic growth unless domestic and international aviation can access a modern airspace system. The design of this airspace must enable aircraft to take off from UK airports, swiftly enter the global network and land at UK airports without encountering delays.

**26** The Airspace Design Priorities provide guidance on the way in which the statutory factors listed in section 70 of the Transport Act 2000 should be applied when maintaining (and keeping under review, in consultation with the Secretary of State) the Airspace Modernisation Strategy and when undertaking an airspace change. Safety remains the overriding priority. The Airspace Design Priorities strike a balance between seeking to achieve the Government's objective for economic growth, meeting our climate obligations and minimising adverse noise impacts on local communities. In summary, airspace should be designed to safely meet the capacity needed to enable economic growth, minimise newly overflown populations, minimise the adverse noise impact of aircraft below 4,000 feet, and enable the most flight-efficient flight profiles (thereby minimising greenhouse gas and noise emissions per flight) at and above 4,000 ft.

### **Overarching Principles for Airspace Design**

**27** The design of airspace must safely enable the capacity permitted by the planning decisions applicable to each UK airport, so that:

- Where the relevant planning decision places a cap on the number of aircraft movements, the airspace design must enable that number of aircraft movements to the extent that it is safe to do so;

- Where the relevant planning decision places no cap on the number of aircraft movement, the airspace design must enable the safe maximum number of movements, having regard to the demand for air transport, to and from the runway.

**28** Consequently the CAA should perform its air navigation functions, particularly those concerning decisions which alter airspace design (including the associated processes and procedures), by applying or implementing the Airspace Design Priorities. The CAA should prioritise outcomes in the following order:

1. First, ensure safety and viability (operational flyability) of the design;
2. Within the possibilities remaining after prioritising 1, enable aviation activity permitted by planning decisions;
3. Within the possibilities remaining after prioritising 1 and 2, minimise change to the areas where aircraft noise is currently experienced from aircraft below 4,000 ft;
4. Within the possibilities after prioritising 1, 2 and 3, minimise adverse noise impacts of aircraft below 4,000 ft;
5. Within the possibilities remaining after prioritising 1, 2, 3 and 4, prioritise flight efficiency where aircraft are at 4,000 ft and above.

### **Guidance on the Airspace Design Priorities**

**29** Recognising that increased aviation capacity (and therefore activity) will increase greenhouse gas emissions from the aviation sector, reducing greenhouse gas emissions per flight remains a key objective for airspace modernisation. The Government notes that there is a correlation between minimising fuel burn, greenhouse gas emissions, noise impacts and the most flight efficient airspace design. However, in applying priorities 3 and 4, the Government's guidance is that where aircraft are below 4,000ft, the CAA should prioritise minimising noise impacts rather than greenhouse gas emissions.

**30** In applying priority 4, where practicable, the CAA should take into account the desirability of minimising noise impacts for noise sensitive buildings of which the CAA is aware.

### **Guidance on Single and Multiple routes**

**31** Designs may include single or multiple routes. Each has both costs and benefits for affected parties and stakeholders. Some stakeholders prefer the impact of flights from airports to be distributed over a wider area. Advancements in technology such as Performance Based Navigation mean that aircraft can fly more accurately and predictably, both laterally and vertically. Multiple routes can provide operational flexibility, and to some extent spread the impact between communities. The Government has taken these considerations into account when developing the Airspace Design Priorities above.

**32** The CAA must require that any airspace design developed and proposed by a sponsor aligns with the Airspace Design Priorities. Noting that the opportunity for multiple routes will vary (depending on the circumstances of each volume of airspace, such as the relative congestion of the surrounding airspace, the proximity of other airports and the

operational needs of the airport), it is for airspace change sponsors to consider whether single or multiple routes best achieve those priorities.

**33** Sponsors should explain their choice between single and multiple routes clearly and transparently.

### **Airspace Design in the Planning Context**

**34** Airports and aerodromes provide the means for the majority of aviation activity in UK airspace to take place through ground infrastructure such as runways. As noted above, the construction of this infrastructure, together with any limits on permitted operations, generally results from decisions taken through planning processes. The CAA is a statutory consultee for applications for planning permission and development consent for aviation infrastructure.

### **Decision-making efficiency**

**35** Planning decisions, including conditions or requirements attached to planning permission or a DCO, determine ground-based infrastructure (airports), and therefore where and at what scale aviation activity is possible. Airspace design decisions determine how the resulting air traffic movement activity is safely enabled.

**36** Each decision-maker should avoid considering, or reconsidering, an issue already or more appropriately determined by another decision-maker.

**37** Wherever possible, airspace change sponsors, and other stakeholders should not be asked to duplicate evidence, analysis and other information over different or successive regulatory processes.

**38** In relation to the CAA's airspace design decision-making, sponsors should be asked to provide only information that relates to considerations properly relevant to the airspace design decision, and not information relating to matters on which that decision has no impact.

**39** Following a decision to approve an airspace change, the change will need to be deployed in order to become operational. Because of the size and complexity of some parts of airspace, it is possible that the safest and most effective approach to making an airspace change operational may be through several phased deployments. The CAA's processes and procedures should support this approach where appropriate. The Government will seek to enable the CAA to safeguard such multi-deployment flight procedures<sup>20</sup>. Where an airspace change is delivered through multiple deployments, this should include an appropriate degree of flexibility for the CAA to agree minor amendments to design after the first deployment has taken place, without requiring a new airspace change.

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<sup>20</sup> By making an amendments to the Safeguarding Planning Circular: [Safeguarding aerodromes, technical sites and military explosives storage areas - GOV.UK](#)

## 2. Guidance on how to assess an airspace design against the Airspace Design Priorities

### Introduction

**40** When the CAA exercises its air navigation functions, it is required first to maintain a high standard of safety in the provision of its air traffic services and then to apply consideration to the various factors listed within section 70(2) of the Transport Act 2000. If there is a conflict in the application of the provisions listed in section 70(2), the CAA must, according to section 70(3), apply them in a manner it thinks is reasonable having a regard to those factors as a whole.

**41** To help the CAA do this, airspace change sponsors should be required to demonstrate how they have undertaken an adequate assessment of different impacts and taken into consideration the views of different parties when developing proposed airspace changes.

**42** The CAA should develop processes and procedures containing this requirement in accordance with the following considerations.

**43** A pragmatic approach should be taken to utilising existing environmental assessments where they are still relevant and up to date for the purpose of an airspace change proposal (ACP). This could include, but is not limited to, assessments already undertaken for the purpose of a planning application or other regulatory process for aviation activities to avoid duplicative efforts. The CAA should robustly scrutinise and satisfy itself that any preexisting environmental assessment relied on by a sponsor remains valid and fit for the purpose of an ACP. Where an existing assessment only partially fulfils the requirements of an ACP, the CAA should ensure that sponsors carry out sufficient supplemental work.

### Noise Assessments Metrics

**44** In order to enable the CAA to apply the Airspace Design Priorities, the CAA's processes and procedures should require sponsors to carry out an adequate assessment of potential noise impacts of the proposed change as follows.

**45** Change in noise referred to in the Airspace Design Priorities (Section 2) should be considered to be where there is a change, plus or minus, one decibel of noise (i.e.  $\pm 1$  dB).

**46** The CAA should publish guidance on how to assess change, for the purpose of preparing an airspace change proposal in its relevant processes and procedures.

**47** Noise impacts should be assessed using noise modelling software and inputs in accordance with CAP2091<sup>2122</sup>. Noise exposure from aircraft must be calculated up to 4,000 feet; vertical profiles must be truncated at 4,000 feet to exclude noise from aircraft above this level. Noise exposure must be evaluated for the summer average<sup>4</sup> using:

- (1) the LAeq,16h daytime metric between 7am-11pm; and
- (2) the LAeq,8h nighttime metric between 11pm-7am.

**48** Population exposure within the resulting noise contours should be estimated using the latest available demographic data. Noise from aircraft flying at or above 4,000 feet is not a relevant consideration.

### **Flight Efficiency Assessments**

**49** Flight efficiency in this context means the minimum fuel burn per flight. Maximising flight efficiency results in minimising fuel burn for a given flight and is commensurate with minimising greenhouse gas emissions for that given flight.

**50** The planning system, within decisions about physical infrastructure, determines the overall capacity, and thus of the greenhouse gas emissions of air traffic movements to and from UK airports. This considers the overall carbon impact of the airport (including if applicable its construction) as part of that decision process. The Government recognises that the aim of the airspace change process is to deliver airspace improvements within this set capacity, determined by the planning process. In this way, planning decisions are likely to have a greater impact on greenhouse gas emissions from aviation than from the airspace change decisions. The aim of the airspace change process is to deliver airspace improvements within the capacity or other limits set by any planning decision.

**51** Additionally, the CAA should require sponsors to demonstrate any net benefits using comparison to a defined baseline scenario agreed with the CAA. The CAA should publish guidance on how to make this assessment, for the purpose of preparing an airspace change proposal in its relevant processes and procedures. When making airspace change decisions the CAA should have regard only to the greenhouse gas emissions of aircraft using airspace and not of any other activity enabled or consequential on that aviation activity.

### **Transport Analysis Guidance**

**52** The Department for Transport's Transport Analysis Guidance (TAG)<sup>23</sup> includes a means for valuing the positive and negative impacts of an infrastructure proposal or project. Use of TAG allows decisions on transport schemes to take account of the costs and benefits of different options in a consistent manner. The CAA must require the sponsor to use TAG as a method to compare the anticipated impacts of the different options, even if only a single option is developed. The CAA's processes and procedures

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<sup>21</sup> CAP2091: CAA Policy on Minimum Standards for Noise Modelling | UK Civil Aviation Authority

<sup>22</sup> -day summer period from 16 June to 15 September (inclusive)

<sup>23</sup> Transport analysis guidance - GOV.UK

should guide sponsors on the TAG parameters relevant for the purpose of airspace change proposals.

### **Local Air Quality**

**53** Emissions from aircraft above 1,000ft are unlikely to have a significant impact on local air quality. The impact of airspace design on local air quality is generally negligible compared to the impact changes in the volume of air traffic and in use of the local transport infrastructure. Those matters will be considered as part of the planning process.

**54** Accordingly the impact of air traffic movements to and from UK airports on local air quality is not a relevant consideration for the CAA when exercising its air navigation functions.

### **National Parks, Habitats, Biodiversity, Sites of Special Scientific Interest**

**55** The CAA's processes and procedures will need to take account of any relevant and applicable environmental legislation. When undertaking air navigation functions, the CAA is required to consider other relevant policy and guidance issued by the government and devolved administrations relating to habitats, especially those regarding noise, carbon and air pollution.

**56** The impact of aviation activity on habitats, biodiversity, national parks and sites of special scientific interest is not determined by the airspace design. The impact is determined by the planning decisions that enable the airport to be built, and the conditions placed on their operations.

**57** Given the finite amount of airspace available, it will not always be possible to design flight procedures that avoid flying over National Parks, sensitive habitats or Sites of Special Scientific Interest.

### **Guidance related to the Ministry of Defence (MoD), Space and Unmanned Aerial Systems (UAS)**

**58** The CAA is not required to take into account the impacts on the environment when considering airspace change proposals of the following kinds:

- A proposal submitted by or on behalf of the MoD, for aircraft operating by or on behalf of the armed forces.
- A proposal for an airspace trial which has been submitted for the purpose of enabling UAS flights to support policy development and learning or a temporary airspace change to facilitate Government policy to enable new users in order to promote economic growth. Noise complaints during such a trial or temporary airspace change should be required to be monitored by the sponsor and reported to the CAA. Noise attitude surveys should be undertaken as a condition of sufficient trials to build an evidence base to enable future Government policy to be developed to support this activity whilst taking into account its impacts on all stakeholders.

- A proposal for an airspace change which has been submitted to facilitate spaceflight or rocket activities where the environmental impact has already been considered as part of a licence application.

## 3. New users and innovation

### Introduction

**59** It is Government policy to facilitate the entry of new users into the UK aviation system, and the AMS makes clear that UK airspace should be accessible by all. To support novel and innovative users, changes to airspace design, or air traffic control (ATC) operational procedures are required for the purpose of research and development.

**60** As outlined above in this guidance, the CAA does not need to take into account the impacts on the environment when considering airspace change proposals for UAS which supports Government policy development and learning.

### Airspace trials

**61** All airspace trials require prior approval from the CAA and must have a defined objective and a confirmed start and end date. Airspace trials must not be seen as a mechanism to avoid the full airspace change process. If the sponsor wishes to make an airspace trial permanent, it will need to undertake the full airspace change process.

**62** The Government recognises that it is not proportionate for a sponsor wishing to implement a trial to be required to follow the full environmental assessments required for a permanent airspace change. The CAA should consider what assessment is sufficient and proportionate to the proposed trial.

**63** After an airspace trial, the airspace should revert to its original state until such time as the full airspace change process can be completed. However, it is not always practical to disestablish a trial procedure. In such instances, the CAA may consider extending the trial whilst the airspace change process is being completed.

**64** DfT expect that sufficient information is provided to those likely to be impacted by the trial before implementation and that noise complaints are monitored by the sponsor, and reported to the CAA, as part of the trial data. If the basis of the noise complaints suggests to the CAA that the sponsor failed to provide information properly before implementation or that the trial is not meeting its objectives, the CAA should seek to end the trial as soon as it is safe and practicable to do so.

## **Temporary change to airspace design**

**65** A temporary airspace arrangement will usually revert to its original state at the end of the designated period. Under extraordinary circumstances it may not do so but this is only permitted with the express authorisation of the CAA.

**66** The Government recognises that it is not proportionate for a sponsor wishing to implement a temporary airspace arrangement to follow the full environmental assessments required for a permanent airspace change. The CAA should consider what assessment is sufficient and proportionate to the temporary arrangement.

**67** If a sponsor wishes to extend a temporary airspace arrangement beyond the originally agreed end date, the CAA should assess whether the rationale for doing so is appropriate. An extension should not be granted solely to remove the effort required by a sponsor when pursuing the full airspace change process.

**68** The sponsor should monitor and report to the CAA any complaints associated with a temporary airspace arrangement once it has been implemented. Any complaints should be taken into account by the CAA before any decision to extend the period of the temporary change.

## 4. Guidance on engaging with those impacted by airspace use

### Introduction

**69** Airports should have high quality and open engagement with their local communities on an ongoing basis. Specific consultation requirements for sponsors should be set out by the CAA as part of their airspace change processes and procedures. This guidance deals with both airspace change processes and aspects of the CAA's air navigation functions that concern ongoing airport operations.

### Consultation on an airspace change proposal

**70** Where the CAA's process and procedures require consultation with local communities, sponsors should be required to adhere to the principles set out in the Cabinet Office Guidance on Consultation principles<sup>24</sup>.

**71** In all cases, the CAA should determine the appropriate level of consultation required of a sponsor for a given change, and scale the required process accordingly.

**72** CAA should require sponsors, when undertaking consultation, to select the most appropriate and proportionate delivery medium based on what is best suited to their stakeholder group and local communities. The CAA should encourage sponsors, where appropriate, to consider the use of bodies such as local authorities or representative bodies during consultations.

**73** The principles set out in Section 2 of this Guidance must be applied to the particular volume of airspace that is the subject of each ACP. The CAA's processes and procedures should require sponsors to gather the information needed to apply those principles to the volume of airspace in question having regard to its location and other characteristics.

### Expectations for transparency on aircraft movements

**74** Whether or not they are engaged in a current airspace change process, airports and their air navigation service providers should engage proactively on the noise impact of

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<sup>24</sup> [Consultation principles: guidance - GOV.UK](https://www.gov.uk/guidance/consultation-principles)

aircraft operating into and out of their airport with their local communities. This could be achieved through established bodies such as Airport Consultative Committees, other relevant consultative groups, and, where appropriate, through other means such as the internet and social media, to engage and inform their communities as appropriate on relevant air operations.

**75** As part of the engagement activities carried out by the airports, they are required, where it is practicable to do so, to provide their local communities with information on the tracks flown by aircraft, the numbers of flights, and altitude data.

### **Aircraft operational changes affecting the use of airspace**

**76** The Government recognises the need to avoid disproportionate regulatory burden, and the CAA should take this into account when carrying out its function of guiding airports on specific flight information to publish. However, where an airport has approved standard instrument departure flight procedures, the CAA should encourage airports to publish information that compares the actual routes flown by aircraft departing UK airports as compared to the nominal tracks of those departure procedures.

**77** Airports and airspace change sponsors should also be aware that over time it is possible that the distribution pattern of air traffic and the types of aircraft being flown can change and that this can have a noise impact. For example, airlines may make changes to the routes they fly or increase the intensity of flights to more popular destinations. Airports and sponsors are therefore expected, where practical to analyse how aircraft operations involving their airport affect the use of airspace, be transparent with communities about any identified changes to the distribution of air traffic and consider whether any such changes may constitute a Planned and Permanent Redistribution of Air Traffic (PPR).

**78** The CAA should set specific guidance for aircraft operational changes affecting the use of airspace. This guidance should outline expectations for airports around community engagement and transparency. The CAA's guidance should focus on the provision of information by airports and airspace change sponsors to communities and increasing the level of transparency that exists with air operations. Where the CAA is aware that an airport is withholding information, it should consider exercising its powers to obtain information from providers of air traffic services.

### **Publication of route information by airports**

**79** To provide communities with transparency on the numbers of aircraft flown near them, the CAA's guidance should encourage airports to publish details of where the aircraft are actually flying, and the amount of noise created. These airports, working with their local communities, may determine the precise information they wish to publish.

**80** The CAA's guidance should guide airports that the information should be made available on the airport's website and also provided to their respective consultative committees. It should be updated on a regular basis, although the airport should be able to determine the precise frequency of this taking into account the views of their local communities. Airports should also be encouraged to provide annual information returns which will enable communities to see whether there have been any changes in traffic patterns over previous years.

## **Use of airspace by helicopters and light aircraft operators**

**81** The CAA should guide airspace users, such as helicopter and light aircraft operators, to ensure that when operating over built up areas they do so with consideration for the people who may live there. In addition, airspace users not flying instrument flight procedures should also give similar consideration when they operate over National Parks and Sites of Special Scientific Interest.

**82** It is desirable to try to balance benefits on the one hand against any noise impacts on the other. The Government therefore strongly urges all airports and aerodromes across the UK to engage closely with their statutory airport consultative committees. Measures which could be taken include establishing local community meeting groups where all can meet and discuss any ongoing concerns, encouraging pilots to avoid overflying built up areas where practical to do so, and greater attention paid to the effect of noise from intensive operations such as take-off and landing training exercises.

## **Arrangements for airspace change proposals already under development at the date of publication of this Guidance**

**83** This guidance will apply:

- In respect of all new airspace change proposals commenced after its publication.
- Where an airspace change proposal designing a block of UK airspace that covers the area of airspace managed by more than one airport and is being progressed by the UK Airspace Design Service (UKADS).
- Where an airspace change proposal has not completed the stage 2 gateway of the CAA's current CAP1616 process at the date of its publication.

**84** The Air Navigation Guidance 2017 (or Air Navigation Guidance 2014 if applicable) continues to apply to other airspace change proposals that are in progress provided that an airspace change proposal is submitted to the CAA for decision by the end July of 2027. The CAA is encouraged to consult the Secretary of State if it considers there is any doubt whether the Air Navigation Guidance 2026 may apply to an ongoing airspace change proposal.

# Glossary

## **ACP - Airspace Change Proposal**

A proposal (usually from an airport or air navigation service provider) to change the design of UK airspace.

## **AMS - Airspace Modernisation Strategy**

The UK CAA's coordinated strategy and plan for the use of UK airspace. It is based on four strategic objectives: Safety, Integration, Simplification and Environment.

## **AMSL - Above Mean Sea Level**

A unit of measurement (usually in feet) for elevation or altitude, indicating the vertical distance of a location relative to a historical average of the ocean's surface.

## **AND - Air Navigation Directions**

In these Directions the Secretary of State gives the UK CAA its functions in relation to air navigation.

## **Airspace Design Priorities**

The Airspace Design Priorities, sets out the Government's priorities for airspace redesign, explaining how environmental objectives sit alongside other aims and objectives of Government policy for aviation.

## **ANSP - Air Navigation Service Provider**

An organisation which operates the technical system, infrastructure, procedures and rules of an air navigation service system, which may include air traffic control.

## **ATC - Air Traffic Control**

The service provided by controllers to prevent collisions between aircraft and to expedite and maintain an orderly flow of air traffic.

## **ATS - Air Traffic Services**

The various flight information services, alerting services, air traffic advisory services and ATC services (area, approach and aerodrome control services).

## **Airspace Design**

The structure of airspace and flight procedures within it.

## **Airspace Management**

A function with the primary objective of maximising the efficient use of airspace.

## **Airspace Users**

All persons or organisations who make use of the United Kingdom's airspace to conduct or support an aerial activity, whether by operating within it, managing its use, or influencing its accessibility.

## **CAA - Civil Aviation Authority**

The statutory body which oversees and regulates all aspects of civil aviation in the United Kingdom.

## **CAP 1616 - Airspace Change Process**

The staged process an airspace change sponsor follows to submit a proposed change in airspace design to the UK CAA for a decision.

## **CAT - Commercial Air Transport**

Any aircraft operation involving the transport of passengers, cargo or mail for remuneration or hire.

## **dB - Decibel of Noise**

A decibel is a logarithmic unit describing sound level or changes of sound level.

## **DCO - Development Consent Orders**

A Development Consent Order is the formal permission required to build a Nationally Significant Infrastructure Project in the UK, such as large energy or transport developments.

## **DfT - Department for Transport**

The government department that leads on UK aviation and the author of the Air Navigation Guidance.

## **EASA - European Union Aviation Safety Agency**

The European Union authority for aviation safety.

## **eVTOL - Electric Vertical Take-Off and Landing**

Also known as advanced air mobility or aerial taxis. Still in development, eVTOL aircraft are powered by electricity.

## **GA - General Aviation**

All civil aircraft, which encompasses a wide range of aviation activity from paragliders, microlights, gliders and balloons to corporate business jets, including aerial survey, flying training and all sport and leisure flying.

## **ICAO - International Civil Aviation Organisation**

The international aviation body established by the 1944 Chicago Convention on International Civil Aviation.

## **MoD - Ministry of Defence**

The Ministry of Defence protects the security, independence and interests of the UK at home and abroad. Its aim is to ensure that the armed forces have the training, equipment and support necessary for their work, and that they keep within budget.

## **Navigation Services**

The facilities and services that provide aircraft with positioning and timing information.

## **Noise Contours**

These are lines or circles on a map showing where equal levels of noise are experienced.

## **NPRs - Noise Preferential Routes**

A set departure path that aircraft should try to follow when using an airport; established through local planning processes for noise management purposes.

## **PBN - Performance Based Navigation**

A concept developed by ICAO that moves aviation away from the traditional use of aircraft navigating by ground-based beacons to a system more reliant on airborne technologies, utilising area navigation and global navigation satellite systems.

## **PPR - Planned and Permanent Redistribution**

Air traffic control operational procedure changes that give rise to a planned and permanent redistribution of air traffic.

## **SofS - Secretary of State**

The Secretary of State for Transport oversees the policies and priorities to deliver the government's transport agenda.

## **Sponsor**

An organisation that proposes, or sponsors, a change to the airspace design in accordance with the UK CAA's CAP 1616 airspace change process.

## **TAG - Transport Appraisal Guidance**

This is the structured process for evaluating potential transport interventions by assessing their costs, benefits, and wider impacts.

## **Transport Act 2000**

The legislative framework created to establish the framework for modernising and integrating transport systems, introducing measures like local transport plans and strategies.

## **UAS - Unmanned Aerial Systems**

Also commonly known as a drone or RPAS, an aircraft system without a pilot on board which is controlled and operated from a remote location.

## **UKADS - UK Airspace Design Service**

A proposed single entity to propose, design and deliver a holistic and modernised UK airspace.