Annex A

See below list of supporting documents for Items 4, 5 and 6:

Item 4(a): CAA Finance Forum DOCUMENT B

Item 4(b): CAA Finance Forum DOCUMENT D

Item 5(a): Draft minutes from CAA EIF meeting of 4.11.26

Item 5(b): Slide presentation from CAA EIF meeting of 4.11.26

Item 6(a): CAP1616 consultation: SASIG response

Item 6(b): UK ETS Aviation consultation: SASIG response

Item 6(c): Air Navigation Directions & Guidance: SASIG response

Item 6(d): CAA's Airspace Modernisation Team slide presentation: 12 January 2026

Item 6(e): Q & A from AND + ANG webinar held on 12 January 2026


Local
Government
Association

UK Civil Aviation Authority – Strategy 26/27

Document B

UK Civil Aviation Authority

Our Mission: Protecting People, Enabling Aerospace

Our Values: Respect Everyone, Do the Right Thing, Never Stop Learning, Build Collaborative Relationships

Strategic Focus Areas

Protecting consumers and the public	Enabling aviation and aerospace to innovate and grow	Developing relationships to improve standards globally	Supporting aviation to improve environmental sustainability	Enhancing our organisation to delivery this strategy

Annual Strategic Objectives FY26/27

• Sector resilience**	• Regulatory pathways to enable Beyond Visual Line of Sight Operation of RPAS*	• Leverage our global relationships to support delivery across all strategic objectives	• Hydrogen power*	• Improve customer experience Commercial Pilots, and deliver first phase of the Future Surveillance Operating Model**
• Reform legislative frameworks*	• Regulatory pathways to enable commercial piloted eVTOL operations*		• Environmental information and reporting*	• Elevate Senior Leadership Capability
• Safety oversight and policy enhancements	• Advance the airspace modernisation programme*			• Strengthen the CAA's Employee Value Proposition
• Improve industry compliance with passenger rights*	• Enable adoption of AI in aviation			• Drive and demonstrate service value**
• Regulation of Heathrow*				
• Driving value from Next Gen Security checkpoints				

* = continuing delivery of multi-year programmes
** = evolution of an existing ASO

Government Priorities, commitments and funding

Programme	ASO	Govt Funding?	Growth Goal?
Deliver a prioritised set of targeted sector resilience improvements	Y		
Reform CAA legislative frameworks to cut burdens and drive growth	Y		
Deliver our safety oversight and policy enhancements programme	Y		
Improve industry compliance with passengers rights	Y		
Regulate Heathrow, including capacity expansion, to further the interests of consumers	Y		Y
Support the sector in embedding and driving value from Next Generation security checkpoints	Y		
Deliver the next phase of the RPAS regulatory pathway	Y	Y	Y
Deliver the next phase of the commercial piloted eVTOL regulatory pathway	Y	Y	Y
Advance the Airspace Modernisation Programme to support FoF and traditional operations	Y	Elements	Y
Enable aviation's adoption of Artificial Intelligence tools to enhance safety, security and consumer value	Y	Elements	Y
Leverage our global relationships to support delivery across all strategic objectives	Y		
Develop regulatory pathways for future propulsion including hydrogen-powered flight	Y	Y	
Deliver enhanced Environmental information and reporting	Y		
Deliver new digital service for Flight Crew Licensing (FCL) and conclude initial phase of the Future Surveillance Operating Model (FOSM) ready to implement September 2027. Trial Service Ownership model	Y		
Elevate Senior Leadership Capability Across the CAA	Y		
Strengthen the CAA's Employee Value Proposition (EVP)	Y		
Enhance our regulatory and business operations to drive and demonstrate service value through operational frameworks, impact reporting and the benefits from continued AI tool adoption.	Y		
Space Flight Regulation		Y	Y

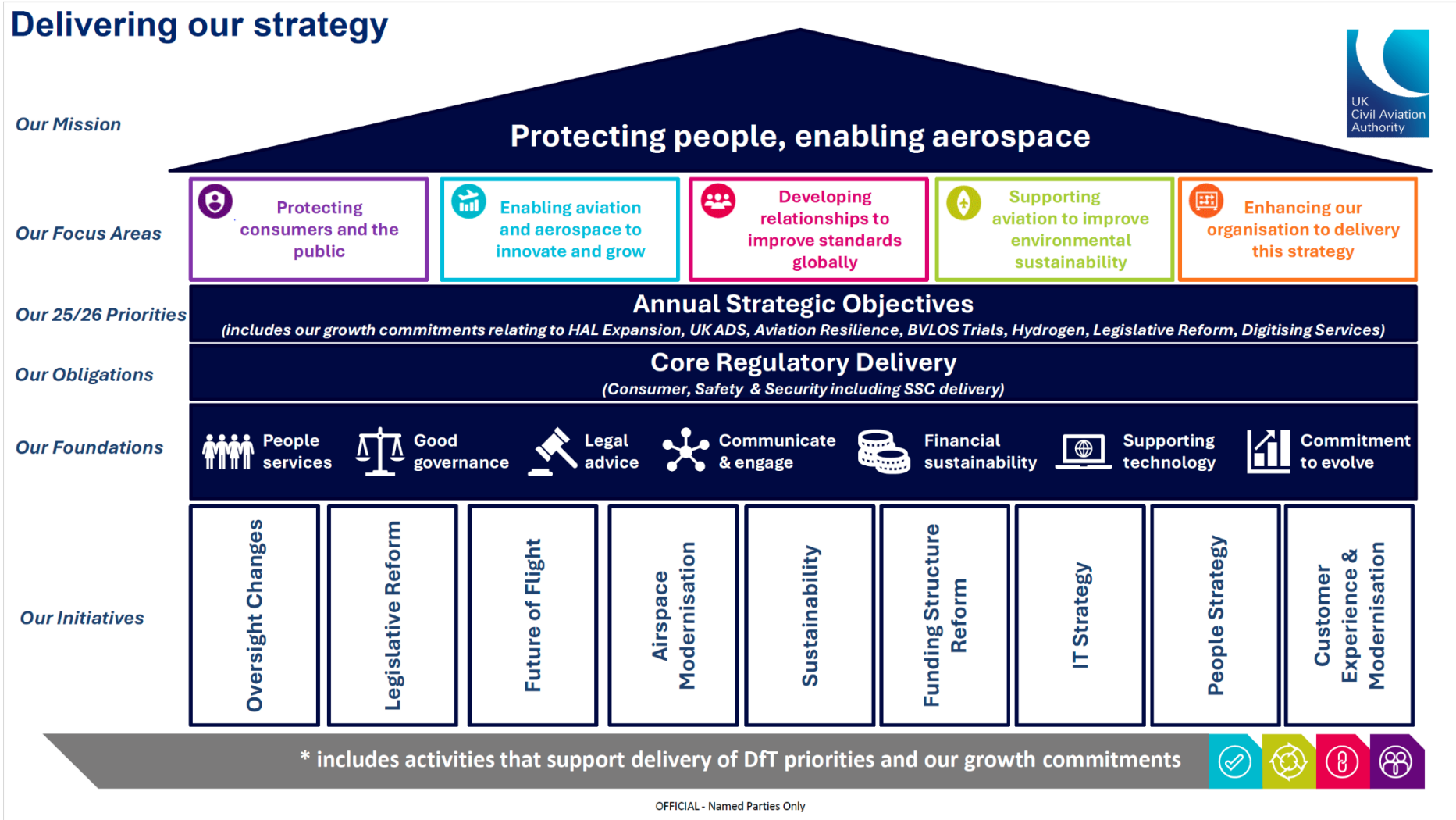
Supporting Government's growth agenda

- The Regulatory Action Plan, published in June 2025, summarised government's approach and detailed both key commitments from regulators (including CAA) as well as government expectations, and strategic direction.
- CAA's commitments - updates:
  - In 2025, DfT and the CAA confirmed plans for the **UK Airspace Design Service** (UKADS), put regulations in place to support its creation and launched multiple consultations on the changes required to provide the new service.
  - The CAA launched consultation on changes to the **airspace change process** (CAP1616) in September 2025. In parallel, DfT are consulting on important policy changes to the Air Navigation Directions and Air Navigation Guidance.
  - With on-going Government funding, the CAA continues to deliver on **beyond visual line of sight** (BVLOS) drone trials supporting the four government priority areas, enabling over 1100 trial flights. In October 2025, CAA published a commercial roadmap for enabling BVLOS operations.
  - The CAA have been formally nominated as the **Market Surveillance Authority**, streamlining the process for companies to manufacture and identify drones that are able to pass required safety criteria. This will be fully established by the end of 2026.
  - The first phase of the CAA's **digital licensing platform for Air Traffic Controllers** will be launched in Spring 2026 with subsequent phases later in 2026; the discovery work on **pilot licencing digital service** is progressing well.
  - With on-going DfT funding, in July 2025 the CAA expanded sandbox safe trial activity for **hydrogen propulsion** to 13 members.
- Other key growth programmees:
  - **Heathrow Expansion**: A key focus for the CAA is our role in supporting the timely implementation of airport expansion at Heathrow.
  - **Future of Flight**: Subject to DfT confirming their commitment to the full multi-year programme funding the CAA will continue its work to enable routine BVLOS operations for key government priority use cases.
  - **Artificial Intelligence**: In 2026 the CAA will pilot AI-enabled automation in key functions (e.g. in mandatory occurrence reporting) and produce guidance that looks to support safe and trustworthy adoption across the aviation and aerospace sector.
  - **Spaceflight Regulation**: With the support of RIO, in 2026 the CAA will deploy new metrics to help identify potential pinch points in processes, as well as piloting approaches to achieve a more flexible regulatory regime. This will speed up licensing timelines and improve predictability.
  - **Legislative reform**: We will continue to support work on reforming our overarching legislative framework, to enable us to act more rapidly and anticipate the needs of emerging sectors; to improve the proportionality of the existing regulatory framework; and to maintain alignment with international standards.
- Other key growth focussed work:
  - The **Annual Simplification Plan**: the ASP is the vehicle DBT are using to measure each department's contribution to the 25% admin burden reduction target. DfT have a single departmental return, to which CAA is contributing.
  - **Service Performance Data** publication: published quarterly by CAA against a range of targets, with a dashboard of all regulators recreated by DBT.

Document D

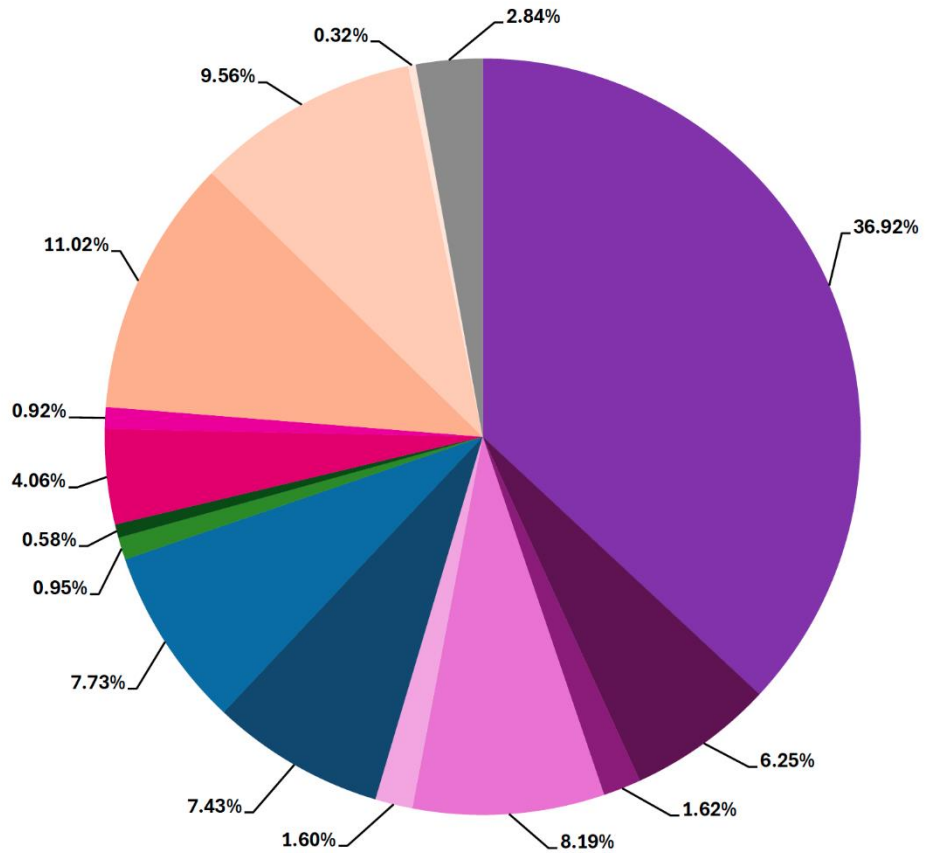
Business Plan 25-26 Update

Nic Stevenson & Ella Payne


Delivering our strategy
UK Civil Aviation Authority
Our Mission
Protecting people, enabling aerospace
Our Focus Areas
Protecting consumers and the public
Enabling aviation and aerospace to innovate and grow
Developing relationships to improve standards globally
Supporting aviation to improve environmental sustainability
Enhancing our organisation to delivery this strategy
Our 25/26 Priorities
Annual Strategic Objectives
(includes our growth commitments relating to HAL Expansion, UK ADS, Aviation Resilience, BVLOS Trials, Hydrogen, Legislative Reform, Digitising Services)
Our Obligations
Core Regulatory Delivery
(Consumer, Safety & Security including SSC delivery)
Our Foundations
People services
Good governance
Legal advice
Communicate & engage
Financial sustainability
Supporting technology
Commitment to evolve
Our Initiatives
Oversight Changes
Legislative Reform
Future of Flight
Airspace Modernisation
Sustainability
Funding Structure Reform
IT Strategy
People Strategy
Customer Experience & Modernisation
* includes activities that support delivery of DfT priorities and our growth commitments
OFFICIAL - Named Parties Only

Holistic resource picture by strategic focus area and theme

PC Protecting consumers and the public	55%
IN Enabling aviation and aerospace to innovate and grow	15%
GL Developing relationships to improve standards globally	5%
SU Supporting aviation to improve environmental sustainability	2%
OR Enhancing our organisation to delivery this strategy	20%
Other	3%



* Other = UKAB, ASSI, UKRN & Pensions

25/26 Scheme of Charges Uplifts

Overview

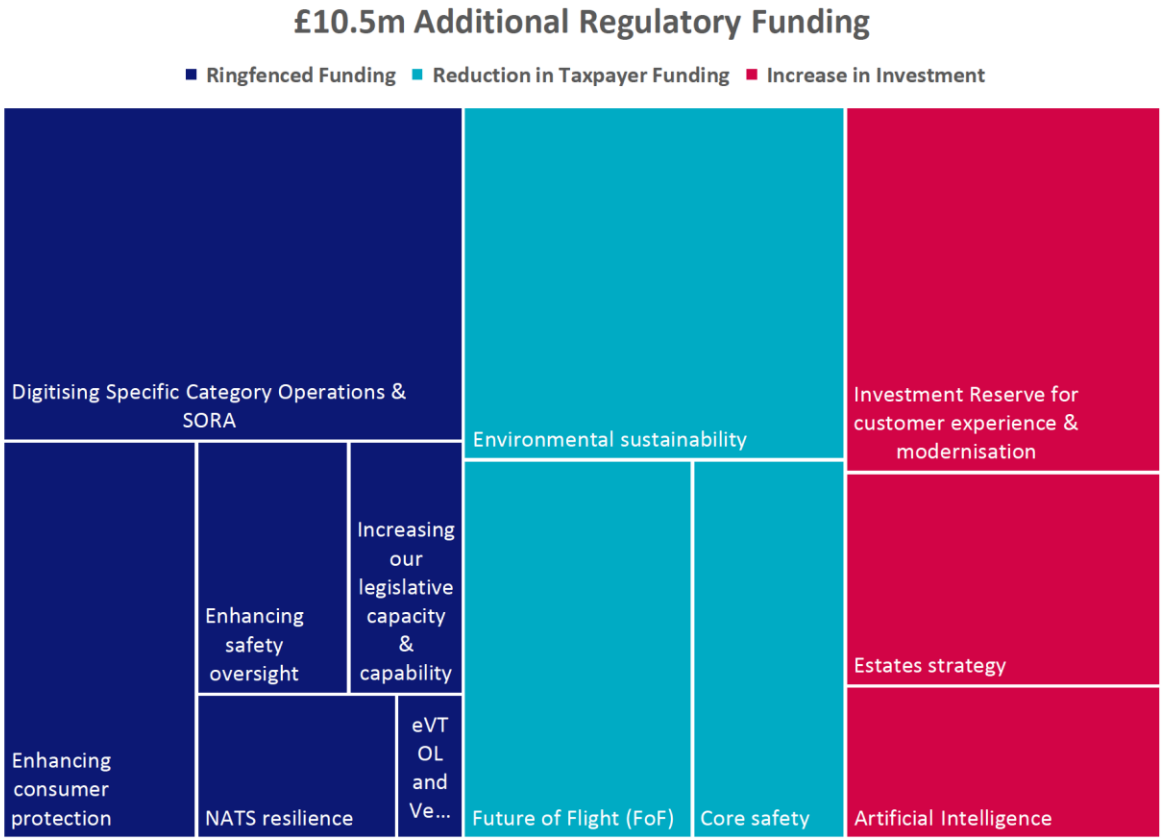
This presentation outlines how funding from the 2025/26 Scheme of Charges is being utilised to enhance service delivery, improve safety, and drive innovation within the aviation sector.

Delivery

The implementation of the funded activities is, for the most part, progressing in accordance with the established delivery plan. Governance mechanisms are in place to monitor progress, address emerging risks, and ensure that activities remain aligned with intended outcomes and value-for-money expectations.

Benefit to customers

A number of initiatives have already begun delivering tangible benefits to customers, including improvements in service accessibility, reliability, and user experience. The remaining activities are on track to be completed within the planned timeframe, at which point they are expected to generate further customer value and reinforce long-term improvements across the sector.



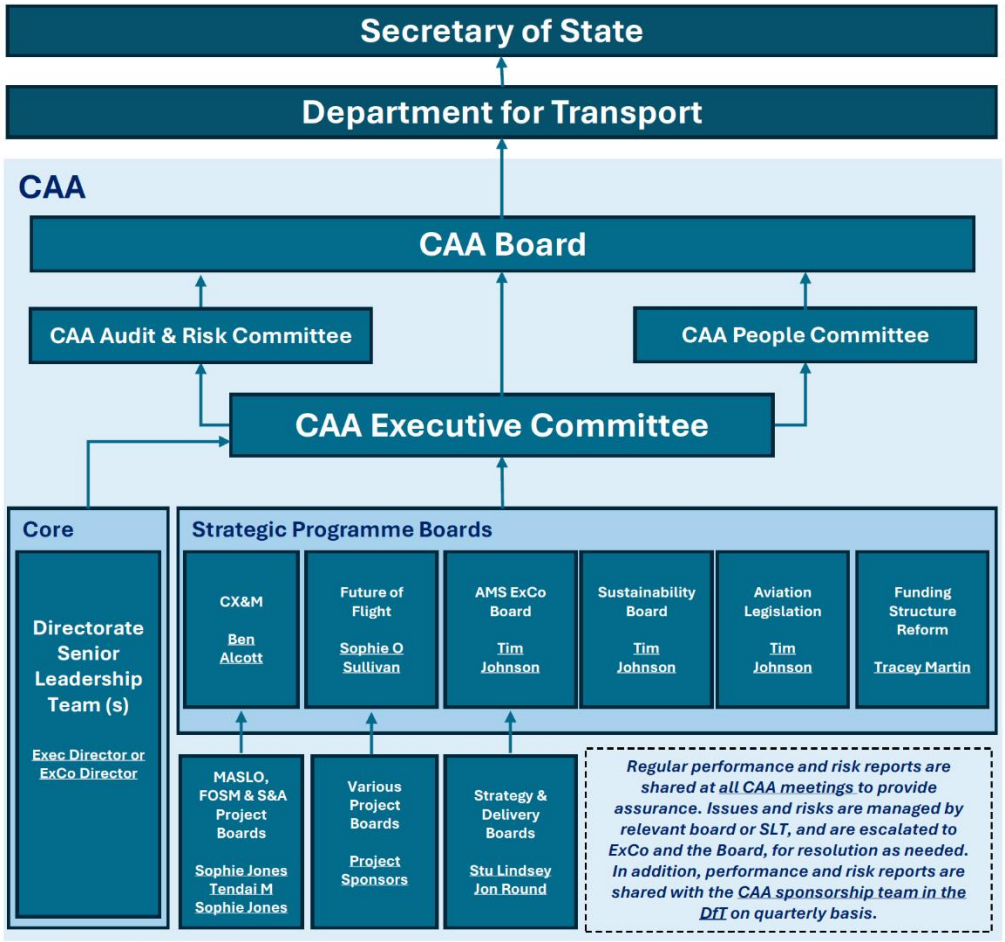
25/26 Scheme of Charges Uplifts Summary #1

	SFA	Title	Additional funding included in 25/26 SoC to….			Delivery update, including RAG and benefit to consumers
Ringfenced Funding		Digitising Specific Category Operations & SORA	£1.6m	Support the introduction of the new platform that will provide enhanced safety, improved efficiency with application processing times, cost avoidance with industry scaling and professionalisation of the RPAS industry.		Launched in Apr 25, UK SORA brings a streamlined, transparent approach to risk assessment, enabling more efficient approvals for advanced operations like Beyond Visual Line of Sight. We have approved the first application using the UK Specific Operations Risk Assessment (UK SORA) to Coptrz. This initial application was completed in just 55 days – a significant improvement on the previous average of 90 days. As the system beds in, similar applications will be processed even faster. **The introduction of the SORA framework, enabled by the launch of DSCO, allows for the safe scalability of the RPAS industry in the UK as the industry grows.**
		Enhancing consumer protection	£0.8m	Allow the CAA to enhance our consumer protection capability, a key ministerial priority from government.		Progressing to plan. After successfully recruiting a Consumer Policy Principal, the UK 261 Compliance Programme has now been opened and a staged approach to reviewing compliance against the regulation with a particular focus on Article 9 (the right to care) has been agreed. Programme milestones are being developed in parallel with formal information requests to 10 airlines ahead of meetings with these organisations to build engagement. Improved Consumer Communications workstream has progressed with positive engagement held with both Airlines UK and Board of Airline Representatives in the UK. Both have shared a commitment to promote the CAA published research with their members and to help to identify key contacts within the industry. **Taking greater action in this area will provide consumers with increased assurance that they will be treated fairly by airlines and airports when they travel, leading to increased consumer confidence.**
		Enhancing safety oversight	£0.4m	Bolster our Dangerous Goods (DG) and Ground Handling teams in order for the CAA to continue to deliver the safety assurance required in these key areas.		Progressing on core DG deliverables - Oversight, Providing advice to industry specifically regarding the carriage of dangerous goods by RPAS, Enabling the transport of DG by RPAS by issuing approvals for their carriage (remote Scottish islands, royal mail, medical purposes), attending and preparing for international working groups on Dangerous goods for example for harmonisation of postal standards. **Increasing our work in this area will be of benefit to airlines, airports and consumers, as greater safety assurance reduces accidents and incidents.**
		Increasing our legislative capacity & capability	£0.3m	Create an internal legislative function which will allow the CAA to address the extensive legislative global framework set by ICAO and the changes the UK intends to make.		Status remains Amber, reflecting the complexity of the Bill. CAA and DfT teams are preparing all proposed measures to ensure they are 'ready to go', including safety reform, criminal sanction deficiency resolution and consumer protection powers. Path to Green is confirmation that there is a slot and the DfT and ourselves can support the work to complete the preparations. **Being able to adopt some of the legislative workload from the DfT will improve the efficiency of the delivery, progressing legislative change at a scale and pace required by our stakeholders.**
		NATS Resilience	£0.3m	Take action on the independent review panels recommendations so the CAA can oversee and ensure compliance with its recommendations to industry, including NATS.		NATS status update report sent to DfT in Dec; expect to close all recommendations by end Dec. Update to Board on strategic resilience; path to green is securing stakeholder buy-in to approach and agreeing action plan / deliverables as part of business plan. **These recommendations are wide ranging, and there is a clear consumer interest in ensuring their effective implementation.**
		eVTOL and Vertiport Operators	£0.1m	Enable this sector by creating a mechanism for certification and oversight activities to allow for a robust regulatory approach on these new technologies.		Progress on design certification and validation activities working well and **will allow for a robust regulatory approach on these new technologies.** CAA published its consultation on 6 Nov 25, as planned. Initial informal feedback is positive, with further engagement throughout December. Business, process and technology change impact assessments are underway. Now completed all FY25/26 L1 milestones (pending Battery research publication). Completed a phase retrospective, identifying 12 challenges and recommendations.

25/26 Scheme of Charges Uplifts Summary #2

	SFA	Title	Additional funding included in 25/26 SoC to….		Delivery update, including RAG and benefit to consumers	
Reduction in Taxpayer Funding		Environmental Sustainability	£1.4m	**Allow for the transition of this activity from government grant funding to polluter-pays, ensuring that the CAA is enabling the aviation industry to meet key environmental and net zero targets.**		Progressing to plan and engagement with government on policy and priorities in key areas is progressing, but some risks and uncertainty remain. Refreshed strategy shared with CAA Executive Committee in Jan, and being taken to the CAA Board for final sign-off in Feb. On track to publish initial findings of the Aviation Noise Attitudes Survey (ANAS) early 2026. **Proactive approach will allow us to develop regulatory and policy frameworks that encourage innovation and sustainable practices within industry.**
		Future of Flight (FoF)	£0.9m	**Support delivery of the FoF Programme which will develop and integrate new aviation technologies into the existing aviation ecosystem. Includes work on the Airspace modernisation strategy with the aims of reducing congestion and increasing efficiency with the most efficient use of airspace.**		Programme remains on track. EC Mandate recommendation provided to DfT, following agreement at TDA: agreement at TDA will lead to mobilisation and planning early next year to deliver the recommendation, with significant impacts expected across rulemaking, policies and SARG teams in 26/27. In Nexus, Amazon received their SORA authorisation. Apian working to resolve 29 findings in Matternet SORA assessment, still aiming for authorisation and re-start of London Health Bridge flights, subject to agreement of procedures with the Police. **This will develop and integrate new aviation technologies into the existing aviation ecosystem with enhanced safety and efficiency for all airspace users.**
		Core Safety	£0.6m	**Allow for the transition of these activities from government grant funding to user-pays. Activities relating to lithium batteries, ground handling policy development and air-intercept enforcement will all cease to be funded by the taxpayer from next year.**		Work on lithium batteries and ground handling projects progressing. Readiness activities relating to business rules for risk-based oversight and oversight plan development for GH remain on track before ICAO implementing date of Nov 26, although some timeframes are tight and will require close monitoring. **These are critical activities that we need to ensure continue for ongoing safety assurance.**
Increase in Investment		Investment Reserve for CX&M	£1.2m	**Enable us to increase the pace of delivery of value-enhancing initiatives for our customers, primarily though the modernisation of our services through CX&M Programme.**		Progressing to plan. Work continuing on Air Traffic Services (ATS) Beta, with all efforts focused on delivering into live by end Mar 26. Team is working through some technical challenges with the new technology with a steep learning curve and issues with integration between web front end and D365 backend. Plan in place to introduce four more PA Consulting Developers to the team, and a team will be working over the winter break to ensure we maintain progress - measures will not be adding to the cost of the project, which remains on budget. Future Surveillance Operation Model (FOSM) remains on track with Alpha complete and Beta business case issued, due for full sign-off on the 11 Feb 26.**This funding has allowed us to bring forward the delivery of digitising the end-to-end pilot licensing journey, delivering greater value to customers sooner.**
		Estates Strategy	£0.7m	**Allow for the CAA to relocate from Aviation House to leased premises which aligns with the CAA's future property strategy and ensuring a more efficient and sustainable property portfolio.**		Progressing to plan. Planning application is still awaiting recommendation by the council before it is tabled at the councils monthly committee meeting. We have little control over when this will happen, although does not start to impact out timelines until March. Final marketing materials are being compiled to allow Aviation House (AvH) to be listed as soon as planning is cleared. New property search has commenced however results do not meet our requirements - ExCo directive is to continue to explode how they could meet our space requirements. **The proposed move allows the CAA to avoid the high costs of bringing the existing premises into line with modern standards, including energy efficiency targets.**
		Artificial Intelligence	£0.5m	**Support the work to address the transformative impact that artificial intelligence will have on the aerospace sector in the coming years.**		Implementation of the MOR AI automation improvements is expected to go live date mid February **through which we will explore the implementation of an artificial intelligence-led solution to process Mandatory Occurrence Reporting, providing a significant financial efficiency to the CAA.**
		TOTAL	£10.5m			

CAA Governance Framework



Excludes CAA subsidiaries

The **Secretary of State** is accountable in Parliament for the CAA and the way it exercises its functions. The **CAA sponsorship team in the DfT** is responsible for discharging the responsibilities of the sponsor department - the sponsorship team advises and, as appropriate, acts as a first point of contact on behalf of the SoS on relevant government policy developments.

Chair & Membership	Duties
CAA Chair, CEO, Executive Directors, Non-Executive Directors (NEDs), Chief of Staff & General Counsel	The Board is the CAA's highest decision-making body. The Board will typically make decisions on the most significant issues affecting the organisation, such as approving the annual budget, major policy or governance issues and approving the annual report and accounts.
Appointed NED, currently two additional NEDs. All members are independent.	The Audit & Risk Committee supports the Board in its responsibilities for issues of governance, risk, control and associated assurance.
Appointed NED, two additional NEDs. All members are independent.	The People Committee agrees objectives, assesses performance and agrees reward for the Chair, CEO and EDs and, on recommendation from the CEO, agrees the team-based objectives for all ExCo. The committee also considers and makes recommendations in respect of Board appointments.
CEO, Executive Directors & ExCo Directors, plus Head Safety Ops, Head Future Safety & Chief Info Officer.	The **Executive Committee** supports the CEO in managing and directing the organisation with regard to policy decisions, management of day-to-day business, including the effective management of the organisations performance and risk.
Executive Director or ExCo Director, plus Functional Heads (direct reports)	**Directorate Senior Leadership Teams** supports the Executive Directors and ExCo Directors in managing and directing the organisation with regard to policy decisions relating to core delivery, managing day-to-day operations, including effective management of the directorates performance and risk.
Sponsoring ExCo Director, plus two ExCo Directors & Functional Heads (for relevant areas) CX&M is attended by DfT Strategy & Policy Lead.	**Strategic Programme Boards** supports the sponsoring director in managing and overseeing delivery of specific strategic programmes, including effective management of programme delivery and risk, against ExCo and Board approved scope and budget.
Project Sponsor, plus Functional Heads or Leads (for relevant areas)	**Projects Boards** support project sponsors in managing and overseeing delivery of specific projects, including effective management of project delivery and risk, against programme approved scope and budget.

DRAFT BRIEF MEETING NOTES – FOR REVIEW

CAA ENVIRONMENTAL INFORMATION FORUM - MEETING – 04 11 2025

Chair: Harry Armstrong CAA Head of Sustainability

Secretariat: Alison Harris

Attendees:

EIF Members			
Adam Cumming (AC)	Edinburgh ACC	Mike George (MG)	Gatcom
Andreas Lambrianou (AL)	Heathrow Noise and Airspace Community Forum	Peter Burns (PB)	Manchester ACC
Chris Cain (CC)	SASIG	Shena Winning (SW)	Stansted ACC
David Haley (DH)	Newcastle ACC	Tim Johnson (TJo)	AEF
Duncan Alexander (DA)	London City ACC	Tom McGrath (TG)	Belfast Int ACC
Guido Liguori (GL)	UKACC & East Midlands ACC	Tracey Waltho (TW)	Heathrow CISHA
Martin Routledge (MR)	London Luton ACC		
CAA Members and presenters			
Abigail Grenfell (AG)	Sustainability Strategy and Engagement Lead	Jason Truss (JT)	Principal, UK Airspace Design Service project.
Ben Bouzon (BB)	Head of Environmental Reporting	John Burton (JB)	Sustainability Advice and Reporting Lead
Ben Lippitt (BL)	Manager, Airspace Regulation	Jon Round (JR)	Head of Airspace, ATM and Aerodromes
Caroline Moore (CM)	UKADS Project Manager	Robert Stallard (RS)	Airspace Modernisation Lead

CAA Apologies: Tim Johnson and Stuart Lindsey.

Welcome, minutes and actions – Abigail Grenfell

There were no minutes or actions from the previous meeting.

1. CAP1616 Airspace Change Consultation & Update on Airspace Change Proposals – Ben Lippitt

BL gave an overview of the CAA's consultation on proposed changes to CAP1616 (the Airspace Change Process) to support and facilitate the new UK Airspace Design Service. The consultation was published in September and closes on 18 December 2025. He noted that the Government is also expected to consult on proposals to amend the Air Navigation Directions (AND) and Air Navigation Guidance (ANG) in the coming weeks.

BL discussed the current airspace change proposals under consideration. These cover a range of uses, from small-scale temporary danger areas for UAV trials, military exercises or space launches to large scale FASI changes. We had 246 in the pipeline a few years ago but have increased our capability and the efficiencies introduced to CAP 1616 mean that, although new applications are coming in at roughly the same rate, we have reduced the number of ongoing applications to 175 this year.

BL noted that there were some applications dating back several years – these are mostly now in the post implementation review stage (Stage 7), testing whether the impacts predicted match what has actually occurred. These have been quite complex, not least because of the changes to CAP 1616 and the AND and ANG during the process.

BL discussed the FASI proposals, which have been split into 4 clusters –

- London TMA – this will stop when it reaches Stage 3 and the UKADS will then take the work forward;
- West TMA – has also paused as it waits to deconflict with other clusters, but Exeter has withdrawn so it is now a cluster of 2;
- Manchester TMA - the proposals are now mostly through the gateway, just waiting for Leeds Bradford which is expected to pass the gateway in April 26; and
- Scotland TMA – passed Stage 3 in September and are now consulting on proposals. This cluster will continue to be assessed in line with the current version of CAP 1616.

GL and PB raised concerns about the delays to the MTMA cluster and whether there are any contingencies should Leeds Bradford fail to pass the gateway? BL replied that he expects to see a change proposal next year. On contingencies, once an ACP comes to the gateway it will be judged on its merits and, as the decision-maker, the CAA must remain impartial so has to be careful about how much support it can provide to the airspace change sponsor before this. The application will be closely monitored by the CAA and issues will be discussed with DfT and AGOC. JR noted that the complexity of managing groups or proposals is the reason why the UKADS is being set up. This will be essential if Heathrow's 3rd runway if given planning consent. But he stressed that we have to be prepared for some of them to fail and the input from this group and the ACCs generally is really important for the process.

TJo asked whether the recent Secretary of State announcement on the Heathrow 3rd runway, which called for the UKADS to prioritise the London system, would impact on the timings for the other proposals and clusters?

TJo also asked whether the proposed changes to CAP1616 will include changes to the opportunities for community engagement? BL said that there are proposals to change the way sponsors engage with stakeholders, to ensure that stakeholders are given the right information at the right time so they are able to understand and comment on the proposals, while increasing the ability for the sponsors to make progress. He explained that the early stages of the London cluster raised thousands of potential options and was very complex to explain and to digest, and this led to a significant risk of confusion and consultation fatigue. We are therefore proposing to streamline the consultation process so only more refined options were considered. The decision on the CAP1616 changes will be published in summer 2026.

Tracey Waltho expressed concern on Heathrow expansion as there is a lot that needs to be done. Also, communities will not be aware of how they will be affected until the airspace change proposal is complete. BL said the UKADS will set out how it will manage this once it is fully set up in 2026. He noted that we will publish will further consultations on the UKADS guidance and decisions on the NATS (enroute) Plc (NERL) Licence in November. He was confident that the UKADS process would be very visible and transparent. He also confirmed that the CAA was very aware of the timescales for any Heathrow DCO application and we are all working towards similar timescales, but we need to make sure that each process follows its own swimlane.

AC raised the amount of new housing being built around Edinburgh Airport so there will be new communities to be involved in consultations in the Scottish cluster.

2. Aviation Environmental Review – Ben Bouzon

BB explained that CAA have a duty to publish information on the state of environmental protection relating to civil aviation. We consulted in 2024 on our plans for the Aviation Environmental Review (AER), including whether it contained the right information and where we could make improvements. A summary of the responses was published alongside a five-year roadmap for improvements based on those responses.

This roadmap provides more visibility for our stakeholders on our plans whilst providing flexibility to adapt to the science as well as the political and economic context. The next AER, which the CAA aims to publish later this year, will be web-based and will concentrate on greenhouse gas emissions, noise and air quality.

CC asked about the quality of the data and methodology used for analysis. He said he had concerns about the way that DESNZ calculates GHG emissions and allocates them, and disaggregation to airport level could lead to inaccuracies. BB agreed that accuracy of the data is paramount and the modelling is becoming more and more precise. The CAA is employing a bottom-up approach which is being conducted by his team using time-based approach of actual flight times. We will include an explanation of our methodologies in the AER.

TJo mentioned the last comprehensive report on $C0_2$ emissions was in 2017 when a national breakdown was provided. He suggested that there is a large audience who would appreciate seeing this again. He agreed with CC that the data has to be accurate, but understands the CAA has the tools to do this and he welcomes more granularity. He also suggested the CAA should provide more information on air pollution around airports and should report on external events such as a proposed UK contrail trail in 2026.

3. Noise Action Plans – John Burton

JB gave an overview of the recommendations in our report to DfT on the review of Noise Action Plans (CAP 3110). He noted that it was now for DfT and DEFRA to decide whether and how to take the recommendations forward.

GL asked whether DEFRA and the Department of Transport have been given hard stop dates to respond to the CAA? JB advised that the CAA has not, as this was not the purpose of the review. TJo noted that he had raised the issue with the DfT Aviation Environmental team.

TM raised concerns as he lives on a flight path coming into Belfast International Airport with more long-haul flights during the night. As airlines seem to be increasing long-haul flights, particularly at night, are the CAA covering this in the Noise Action Plans? JB answered that this work and the Aviation Noise Attitudes Survey will cover this aspect to inform government policy. There has also been a recent survey on night flights which included Belfast, so DfT is aware of the issues. TM asked whether the CAA are speaking with the airlines but it was clarified that this is not within the CAA's remit to do so.

TW also expressed concerns regarding night flights noting that Heathrow is allowing more dispensation for late flights following weather related disruption. Triple glazing is helpful but means that people cannot open their windows and homes may need to have more indoor cooling in the future as part of the noise mitigation solutions. She said that evidence from CISHA's AQ expert is

that air quality impacts of closed domestic environments are starting to show quite significant impacts and this needs looking at quite carefully to understand how mitigations may need to evolve.

PB questioned the proposal for local authorities (LAs)to take on the monitoring role, as some LAs own the airport. He also questioned the financial aspects of night flights, particularly whether this only included the financial benefits for airlines and airports and or whether it would take into effect the wider national costs and benefits? JB noted that there was feedback on the need for a cost-benefit assessment of night flights, but this is something the DfT have stated that they are commissioning, not the CAA.

4. Aviation Noise Attitudes Survey – John Burton

JB gave an overview of the survey, the key questions on aviation noise annoyance that are the focus of our analysis and the noise levels that standards that we are using. A draft report on the survey is ready for peer review. In addition, we have already sought an independent expert quality assurance on both the methodology and the outputs through a review of the statistical syntax calculations and outputs. We are also consulting an acoustic data expert for urther assurance on our findings.

5. Climate Adaptation – Abigail Grenfell

AG explained that DfT is planning to publish its Transport Adaptation Strategy by the end of this year. She said that the Climate Change Committee (CCC) has provided advice to DEFRA that the UK should plan for a global temperature rise of 2°C by 2050 to meet its adaptation goals. She gave an overview of the potential impacts that might lead to, such as generally hotter, drier weather but with more frequent heavy storms leading to more flash flooding. The Environmental Agency has been doing some work with airports on these issues, which includes the land surrounding airports particularly low-level ground levels. The CAA will communicate with the Forum once the strategy has been published.

CC questioned whether the CAA was planning to require airports to take action and/or increase their reporting and, if so, asked that consideration and differentiation should be given between small and large airports, noting that smaller airports may struggle to make the required changes without adequate funding which should be included in the policy. HA noted that our thinking was at a very early stage and that we would work closely with the airports on scoping the work, but we currently have limited powers to require action in this area.

6. Roundtable & AOB – Harry Armstrong

The slides and minutes will be shared with the Forum members. We are looking at the logistics for making the recording available on request.

Documents discussed:

The CAP 1616 Airspace Change Process consultation:

https://www.caa.co.uk/commercial-industry/airspace/airspace-change/review-of-cap-1616/

The Noise Action Plan review report:

https://www.caa.co.uk/our-work/publications/documents/content/cap3110/

UK Civil Aviation Authority

UK CAA Environment Information Forum

4 November 2025

Together we will

Agenda

Welcome and Introductions	**Harry Armstrong**	**5 minutes**
Minutes and actions from last meeting	Abigail Grenfell	5 minutes
Airspace		45 minutes
CAP 1616 Airspace Change Consultation	Ben Lippett / Ben Sargeaunt	20
Update on current Airspace Change proposals		25
Reporting, Noise and Climate Adaptation projects.	Harry Armstrong	30 minutes
Aviation Environmental Review	Ben Bouzon	10
Noise Action Plans	John Burton	5
Aviation Noise Attitudes Survey	John Burton	5
Climate Adaptation	Abigail Grenfell	10
Questions and comments from the members	Harry Armstrong	30 minutes
Close and next meeting	Harry Armstrong	5 minutes

Actions from July 2025 Meeting

Action required	Action taken to resolve it
There were no actions from the last meeting	

UK Civil Aviation Authority

Airspace

Together we will

CAP 1616 airspace change process consultation

October 2025

CAP 1616 consultation

Our formal consultation setting out proposals to modify the airspace change process will run for **12 weeks**:

Thursday 25 September – Thursday 18 December 2025

We are modernising the way we do airspace design in the UK to ensure we can deliver the changes necessary to modernise airspace efficiently and effectively, with the establishment of the UK Airspace Design Service (UKADS).

To support this, we need to review our airspace change process to ensure it enables the UKADS provider to deliver airspace changes. This also presents an opportunity to review the broader CAP 1616 airspace change process with a view to further streamline it. As part of the CAA's response to Government to further improve UK economic growth and investment, we committed to consulting on improvements to the effectiveness and proportionality of our process for changing airspace in 2025.

DfT is expecting to consult on the Air Navigation Directions (AND) and Air Navigation Guidance (ANG). Any resulting changes in government policy on airspace will need to be taken into account in any updated airspace change process documentation.

What we are consulting on

In scope:

- Proposals on modifications to CAP 1616: Airspace Change Process, edition 5.1.
- Airspace change proposal guidance for complex airspace change proposals sponsored by UKADS.

Not in scope:

- The decision to modernise the way we do airspace design by introducing the UKADS and any future developments of the UKADS.
- Government policy that impacts the airspace change process.
- Airspace change funding arrangements.
- The airspace change masterplan and related processes.
- Any airspace change proposals, past or present.

Background

2017

CAP 1616 v1

Following consultation, CAP 1616 replaces CAP 725

2018

CAP 1616 v2

CAP 1616 version 2, minor amends

2020

CAP 1616 v3

CAP 1616 version 3, minor amends

2021

CAP 1616 v4

CAP 1616 version 4, minor amends

2022

CAP 1616 consultation

Public consultation on CAP 1616 v4

2023

CAP 1616 v5 and guidance

CAP 1616 v5 and accompanying guidance published, focussed on simplification, clarification and proportionality

2024

UKADS consultation

Public consultation on the creation of the UK Airspace Design Service (UKADS)

June 2025

UKADS announced

NERL confirmed as the UKADS provider

Sept 2025

Onboarding for LTMA region published

Onboarding for the LTMA region ACPs published

Sept 2025

CAP 1616 consultation launched

Public consultation on CAP 1616 process launched

Questionnaire and next steps

The consultation will run for 12 weeks:

Thursday 25 September – Thursday 18 December 2025

You can submit responses online at:
https://consultations.caa.co.uk/safety-and-airspace-regulation-group/airspace-change-process-2025

Next steps:

- No decisions have been made yet.
- Once the consultation has closed, responses will be analysed.
- The feedback received will be considered and used to inform the development of any updated airspace change process.
- We will also need to consider any changes from the DfT's consultation on the Airspace Navigation Directions and Airspace Navigation Guidance.
- We expect the updated airspace change process will be published summer 2026.

NATMAC 98 – 01 October 2025

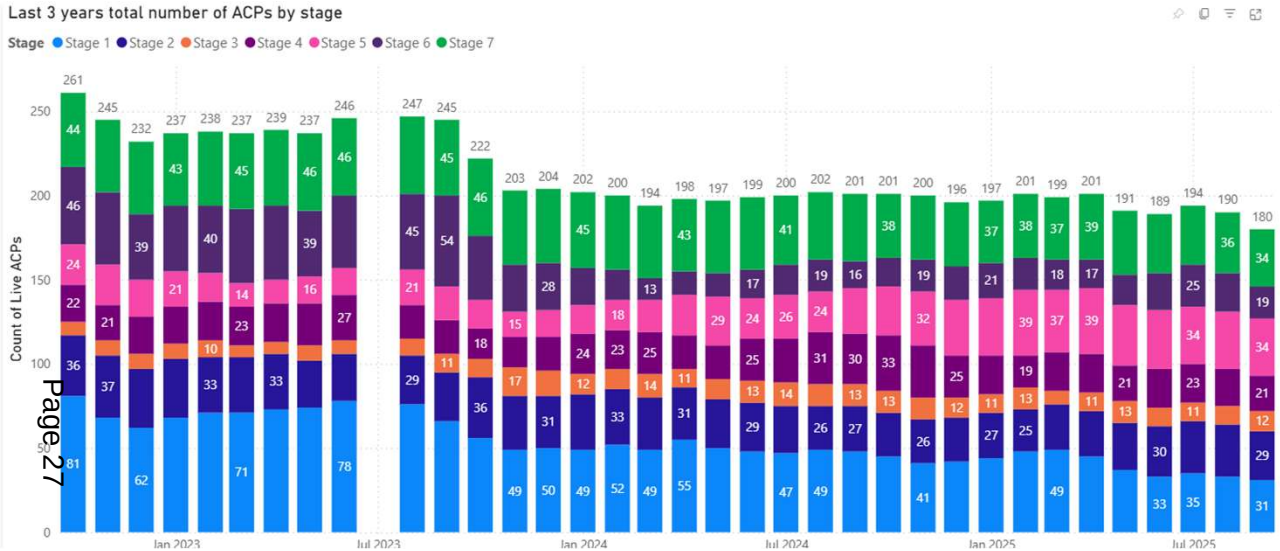
Airspace Change Proposal Update

Manager Airspace Regulation – Ben Lippitt

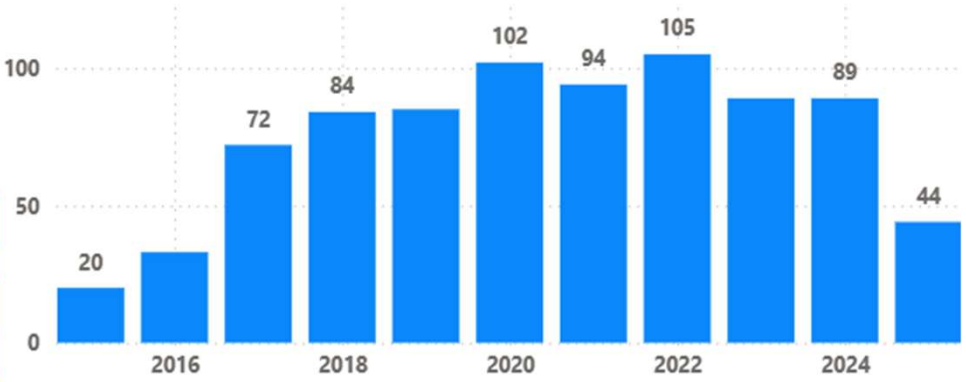
Dataset: 21 September 2025

UK Civil Aviation Authority

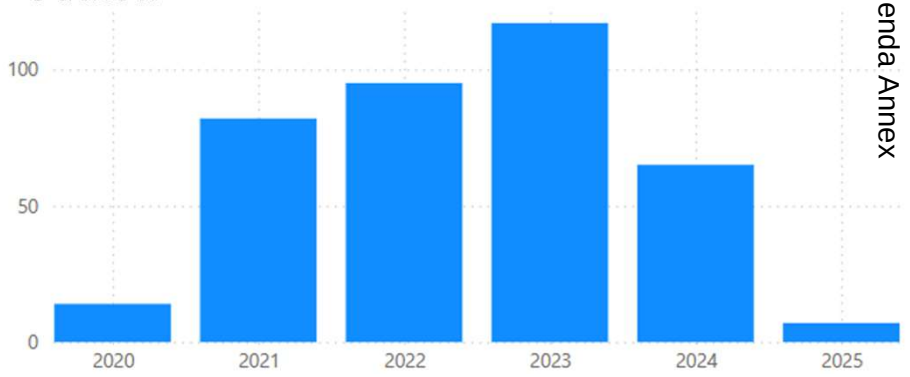
Trend Analysis – Airspace Change Proposals v Flow



Inflow

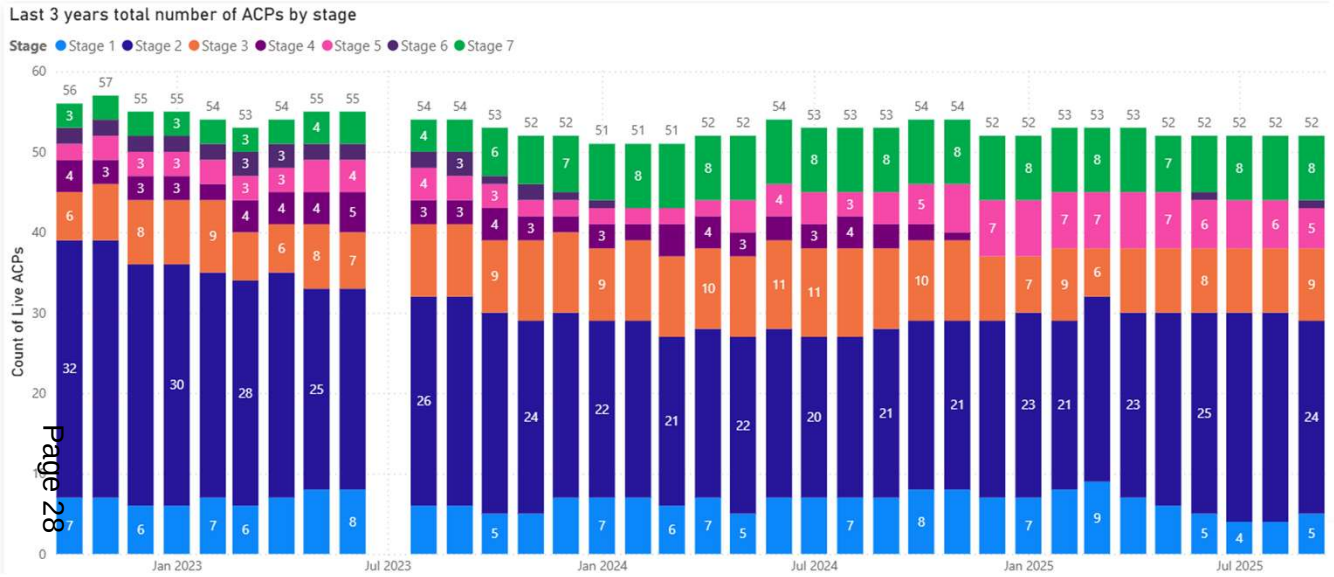


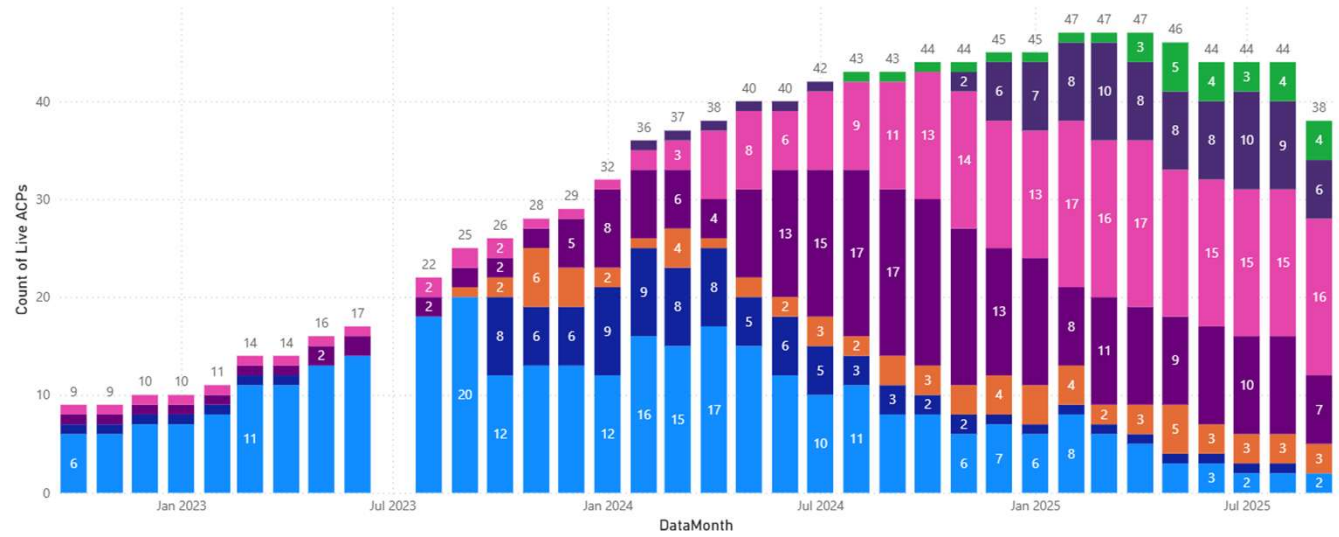
Outflow



- Inflow 2018 - CAP 1616 introduced and FASI initiated
- Overall reduction in ACPs despite large inflow in 2022
- Outflow usually completing 35-50 Level per year, up to March 2025 these were included in the ACP stats. This accounts for 2025 change in outflow and inflow
- Approx 20 ACPs relate to CAP 725
- Approx 80 ACPs have an IFP dependency
- Dependent upon inflow we would expect to be below 180 ACPs by Q4 2025

Airspace Change Proposals by Stage





Level 1 ACPs

- Reduced total **Level 1** changes since 2022.
- Low number of Level 1 ACPs in the early stages.
- Majority of Level 1 ACPs are in Stage 2

Level 3 ACPs

- **Level 3** introduced in Jan 2024 as part of CAP 1616 version 5
- Existing ACPs transitioned across
- We are seeing an increase in Level 3 changes, where the colour differential indicates the increased speed through the process.
- We expect further acceleration aligned to IFP resource.

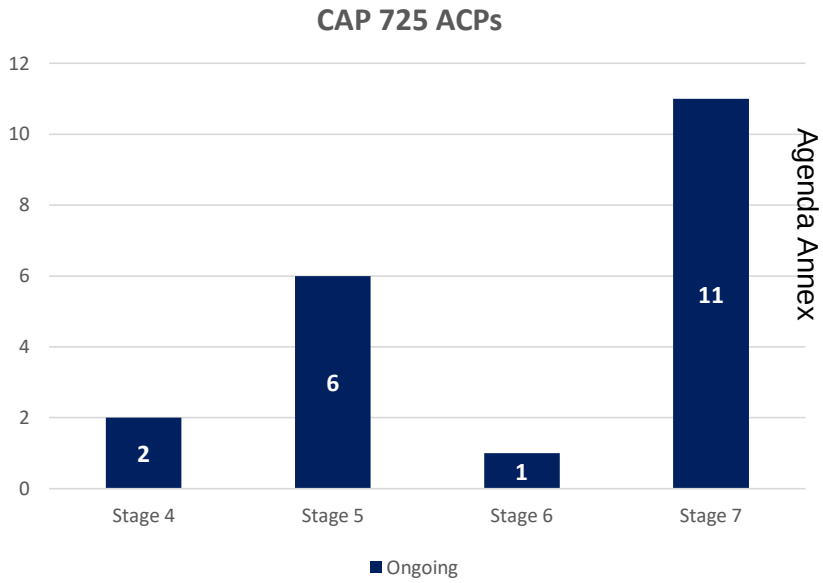
CAP 725 Airspace Change Proposals

CAP 725 total is **20** ongoing ACPs:

- Pre-decision (with Change Sponsor): **2** (Stapleford & Haverfordwest)
- Decision Stage (with CAA): **6** (Inverness, St Mary's, Belfast Int, Southend, Hawarden, Teesside)
- Implementation (post-decision): **1** (Neart na Gaoithe and Inch Cape TMZs)
- Post Implementation Review: **11**

Significant Post Implementation Review

- ACP-2013-07 Farnborough: PIR published April 2025
- Expect remainder of existing Stage 7s to be completed by Q4 2025



Airspace Change Programmes
Future Airspace Strategy Implementation (FASI)

- **'LTMA' Cluster**
  - **14** ACPs currently within this Cluster
    - **14** '**In Progress**'
    - **1** in **Develop & Assess (Stage 2)**
    - **13** in **Consult (Stage 3)**

- Bournemouth (Dec 2025)

- Biggin Hill (Gateway TBC)
- Farnborough (Gateway TBC)
- Gatwick (Gateway Jan 2026)
- Heathrow R2 (Gateway TBC)
- LAMP2 D2 (Gateway Jan 2026)
- LAMP2 D3 (Gateway TBC)
- LAMP2 D4 (Gateway TBC)
- London City (Gateway TBC)
- Luton (Gateway TBC)
- Northolt (Gateway TBC)
- Southampton (Gateway TBC)
- Southend (Gateway TBC)
- Stansted (Gateway TBC)

- **'WTA' Cluster**
  - **3** ACPs currently within this Cluster
    - **3** '**In Progress**'
    - **2** in **Consult (Stage 3)**
    - **1** in **Stage 6 (Implement)**

- Bristol (Gateway TBC)
- LAMP2 D1.2 (Gateway TBC)
- LAMP2 D1.1 (PIR TBC)

Airspace Change Programmes
Future Airspace Strategy Implementation (FASI)

- **'ScTMA' Cluster**
  - **3** ACPs currently within this Cluster
    - **3** '**In Progress**'
    - **3** in **Consult (Stage 3)**

  - **Edinburgh (Stage 3 Gateway passed Sept 2025)**
  - **Glasgow (Stage 3 Gateway passed Sept 2025)**
  - **NERL ScTMA (Stage 3 Gateway passed Sept 2025)**

- **'MTMA' Cluster**
  - **5** ACPs currently within this Cluster
    - **5** '**In Progress**'
    - **1** in **Develop & Assess (Stage 2)**
    - **4** in **Consult (Stage 3)**

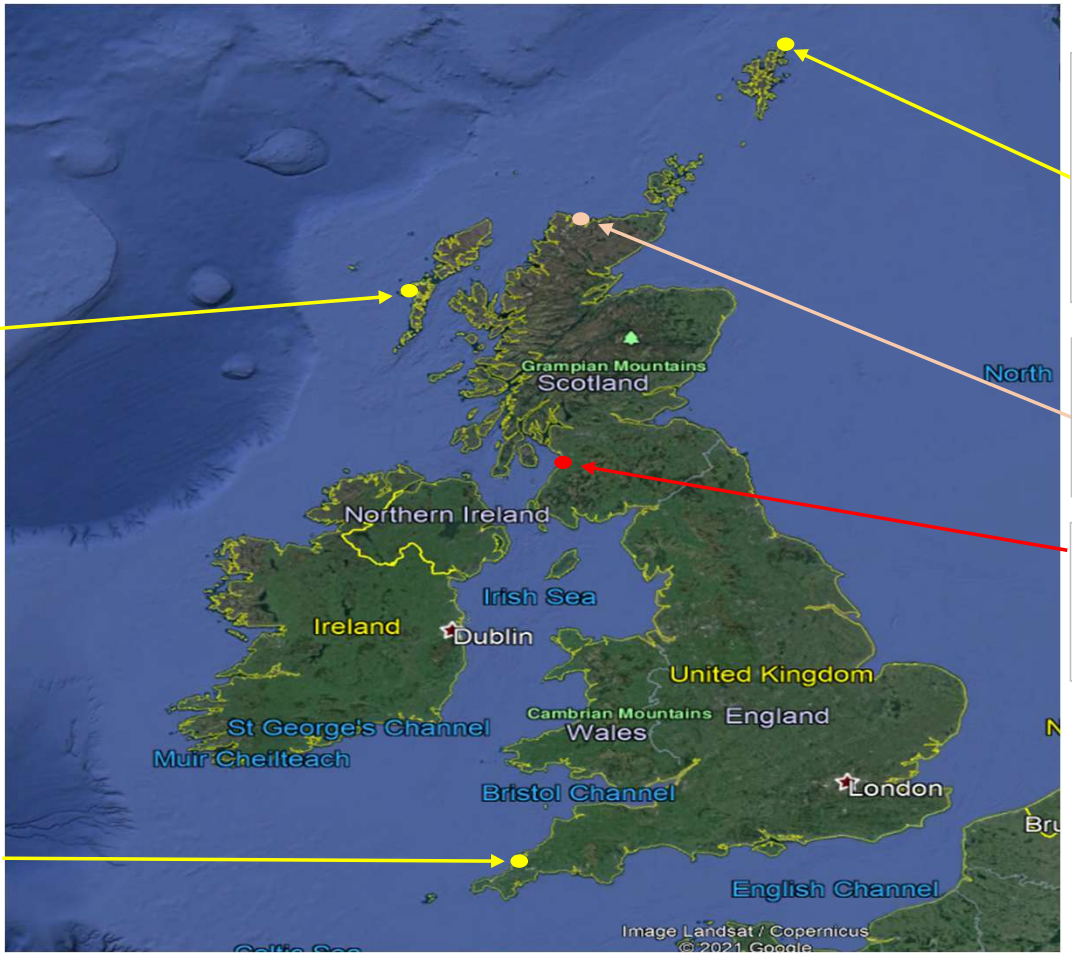
  - **Leeds Bradford (Gateway April 2026)**
  - **Liverpool (Gateway TBC)**
  - **East Midlands (Gateway TBC)**
  - **NERL MTMA (Gateway TBC)**
  - **Manchester (Gateway TBC)**

Space Launch Sites
Ongoing ACPs

UK Civil Aviation Authority

Spaceport-1
Launch Operator TBC

Spaceport Cornwall
Launch Operator TBC



SaxaVord Spaceport
RFA
Orbex
Skyrora
HyImpulse

Space Hub Sutherland
Orbex
Development PAUSED

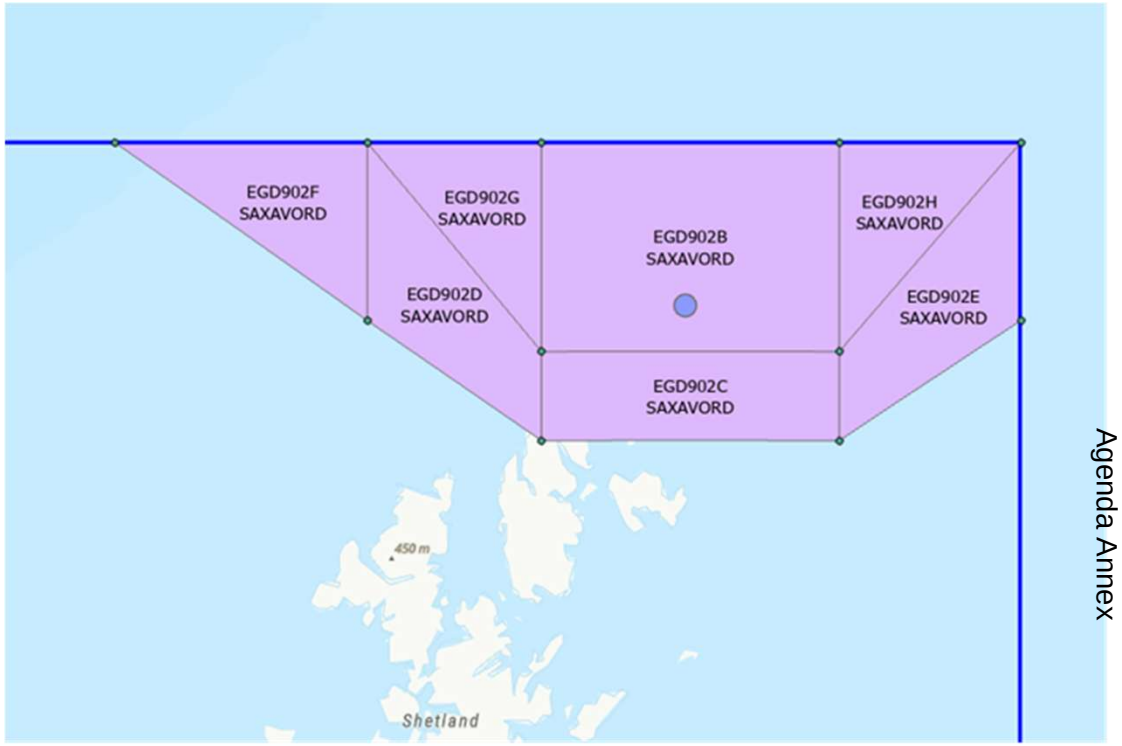
Prestwick Spaceport
Astraius
No longer in development

Airspace Change Proposals
Space Launches

SaxaVord Spaceport (Shetland Islands)

- Permanent (ACP-2017-79):
  - Currently in Stage 5 (‘Decide’)
  - CAA Decision currently Paused. Awaiting development of LoAs and international agreements
  - Subject to a wider northern hemisphere working group
- Temporary (ACP-2021-090):
  - Paused in Stage 5 (‘Decide’)
  - Pending outcome of permanent ACP decision

Final proposed airspace design
ACP-2017-79 SaxaVord Spaceport permanent



Temporary Reserved Areas Sandbox Applications

- **ACP-2022-081 Establishment of a TRA for Trials of Manned and Unmanned Integration (Cranfield)**
  - Assessment Meeting held in July 2024. ACP is 'paused' whilst the sponsor progresses FID approval – could be unpausing this year.

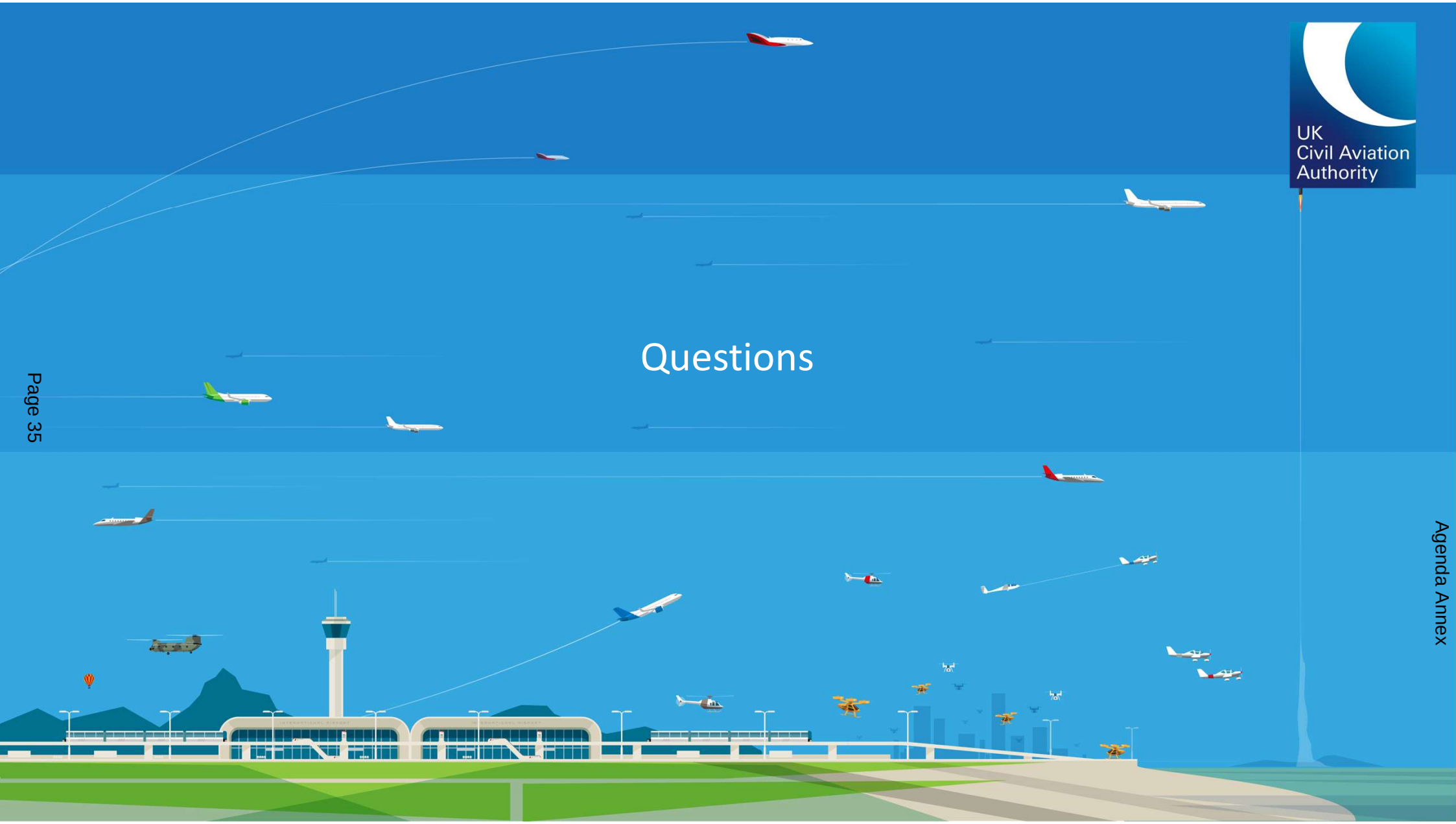
- **ACP-2024-001 NATS BVLOS trial in Unsegregated Airspace**
  - Stage 5 Decide, CAA is awaiting a new timeline to accommodate the need for the sponsor to receive guidance and make updates to the ACP submission.

- **ACP-2024-041 Integrated BVLOS Ops Trial at Kirkwall Airport**
  - Stage 4 Update & Submit (submission due Nov 2025)

- **ACP-2024-056 Darlington and Surrounding Areas TMZ for BVLOS Drone Delivery Services (Amazon)**
  - Stage 5 Decide (decision due Oct 2025)

- **ACP-2025-001 Addition of TRA to Burbo Bank TMZ**
  - Stage 4 Update & Submit (submission due Nov 2025)

- **ACP-2025-008 Project Lifeline**
  - Stage 4 Update & Submit (submission due Sept 2025)



Questions

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UK Aviation Environmental Review

Together we will

UK Aviation Environmental Review
Roadmap

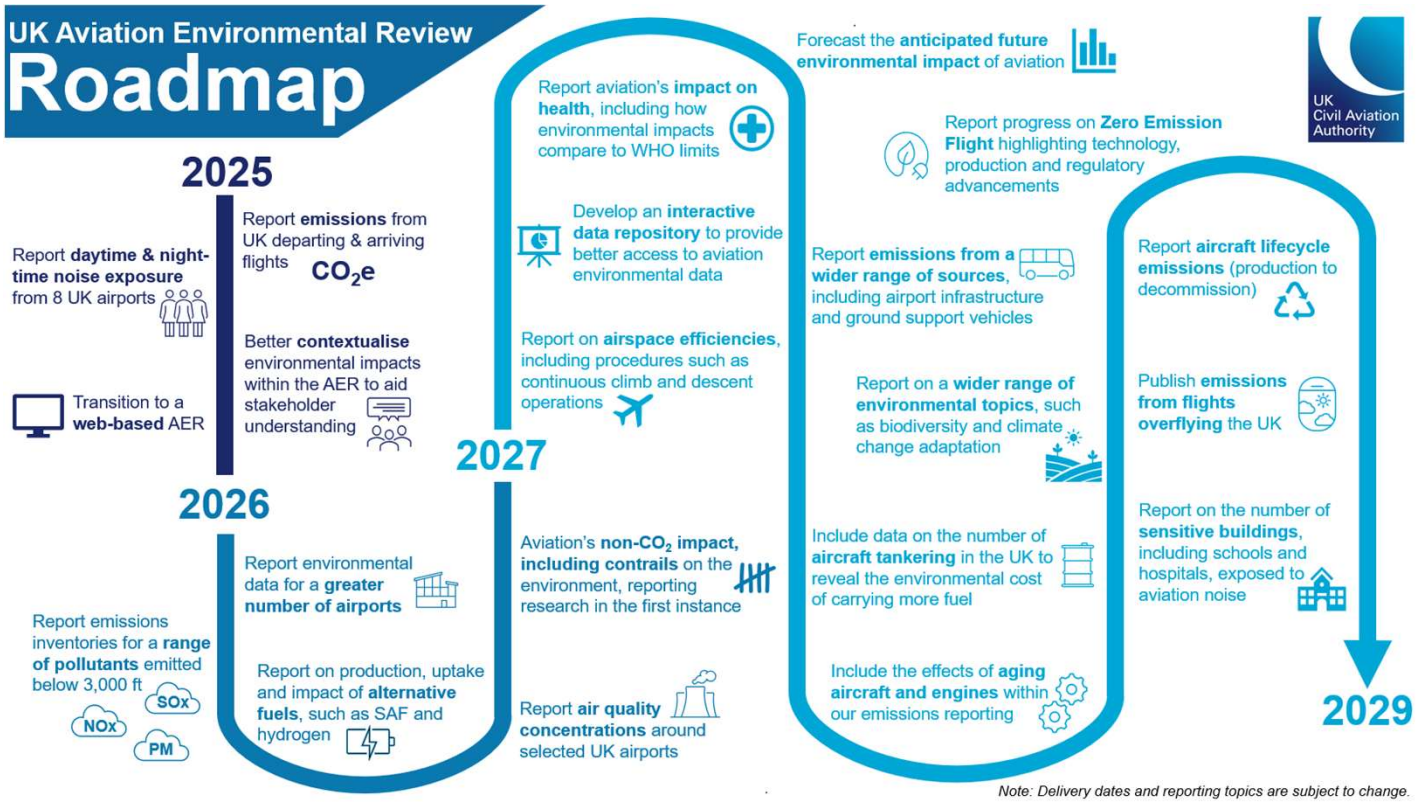
CAP3153: UK Aviation Environmental Review Roadmap | UK Civil Aviation Authority

CAA's duty is to "*inform interested parties and the general public [...] of the state of environmental protection relating to civil aviation*"

AER consultation in 2024

AER Roadmap - A vision for future AERs
- More granular
- More comprehensive
- More accessible

Published on 18th September 2025



UK Aviation Environmental Review

Plan for 2025

First AER published in 2023 (CAP2620)

Next version expected by the end of the year

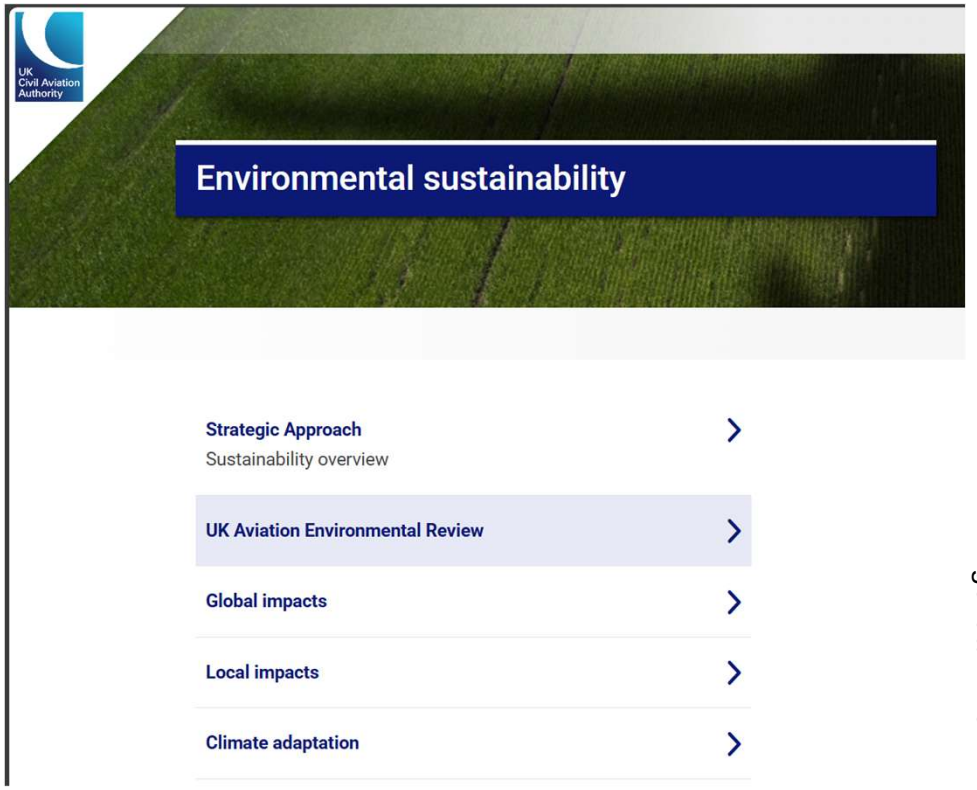
Web-based with CAP

Scope

2019

2024

- GHG emissions
- Noise
- Air quality



For illustration only

Agenda Annex

UK Civil Aviation Authority

Noise Action Plans review

Together we will

Recommendations and next steps

The AtkinsRéalis study identified opportunities to enhance the effectiveness of Noise Action Plans. To support stronger implementation, the CAA proposes 12 targeted recommendations. These were grouped into four key areas:

- Legal framework and Defra guidance
- Engagement and consultation
- Communication and publication
- Monitoring and compliance

Legal Framework & Defra Guidance

R.1 The CAA makes the following recommendations to strengthen implementation of the Noise Action Plans framework :

1. The CAA recommends that Noise Action Plans contain information to explain the rationale behind the requirement for airports to develop a Noise Action Plan. This will help contextualize the legal obligation and enhance understanding among stakeholders.
2. The CAA recommends that Noise Action Plans should clearly state the authority responsible for making and, where relevant, adopting noise maps and Noise Action plans.
3. The CAA notes the limited uptake by local authorities in designating quiet areas, despite the provisions set out in the Environmental Noise Regulations (England) 2006 (as amended). To address this, the CAA recommends that Defra guidance be revised to encourage greater engagement by suggesting that airport consultative committees (ACC) work collaboratively with local authorities to identify and designate potential quiet areas . This would help ensure that the intent of the regulations is more effectively realised in practice.

Context:

Item 1,2 are minor points that came out of the study, hence the recommendation. Item 3 is linked to the 'preservation of environmental noise quality where it is good'.

Legal Framework & Defra Guidance

R.1 cont.

4. The CAA recommends that Defra guidance should provide clarity on financial information required by responsible authorities as part of the Noise Action Plan process. Where a cost-benefit analysis has been used to inform the selection of a measure, that information should be included. Any assumptions made, and trade-off information (where available) should be included. To ensure consistency and robustness, the CAA recommends that recognised methodologies, such as those recommended in the HMT Green Book or incorporated into TAG, be used as references when conducting cost-benefit analyses. The CAA also acknowledges the potential cost and resource implications in undertaking detailed cost-benefit analyses for individual measures.

5. The CAA recommends that DfT commissions research into the effects of aviation noise mitigation measures on public health outcomes. This will enable the development of evidenced guidance on health impacts to better support Noise Action Plans.

R.2 The CAA recommends that the Defra guidance be updated with a requirement for airports to include all relevant legal obligations in their Noise Action Plans. Specifically, this should include information on any relevant planning conditions or section 106 obligations and other similar legal requirements relating to noise that are enforceable. In addition, where other legal requirements—such as flight restrictions related to noise—exist, these should also be explicitly incorporated within the Noise Action Plan framework.

R.3 The CAA recommends that the Defra guidance provide direction on the inclusion of noise forecasting in Noise Action Plans, offer advice on how future technologies should be considered, and how airports should assess and report the potential impact of such technologies on the existing noise environment.

Engagement and Consultation

R.4: The CAA recommends that Defra should ensure the following information is made available to both airports and stakeholders:

1) the steps of the Noise Action Plan consultation process and minimum timelines for the steps of consultation to enable them to prepare for engagements in advance, and

2) further information on the approval and adoption process by clearly defining compliance requirements and decision-making criteria.

R.5: The CAA recommends that the Noise Action Plans should be shared with the stakeholders consulted during development, prior to adoption. A written response to feedback provided during the consultation should be included as an annex to show how the feedback was addressed in the Noise Action Plan. This should include details of where a decision was based on a cost-benefit analysis. Where feedback has not been taken forward, a justification for the exclusion must be given.

R.6: The CAA recommends that the Noise Action Plans should include a list of the community stakeholders who participated in the consultation process, in line with the General Data Protection Regulation. Stakeholders must be informed in advance that their participation will be recorded in a list annexed to the Noise Action Plan prior to their involvement in the consultation.

Context:

The study has identified a need to improve transparency throughout the Noise Action Plan development process. This would improve the ability of community stakeholders to engage in an "informed debate" as required in the Aviation Policy Framework. It would also provide more confidence that noise concerns are being fully addressed.

Communication and Publication

R.7: The CAA notes that Schedule 4 of the Environmental Noise Regulations requires Noise Action Plans to contain a summary covering all the important aspects of the plan. The CAA recommends that the summary should be written in plain English and tailored to a non-technical audience, ensuring the content is accessible and easily understood by the public.

R.8: An accessible version of this summary should also be made available. Airports should consider whether local residents may need documents translated in order to be able to understand them and should take steps to ensure differences in language are not a barrier to accessibility.

Context:

This best practice is already in place at some airports but could be enhanced to improve clarity and accessibility of information for stakeholders. Making communication easier to understand and engage with was a most prominent theme in the questionnaire responses from community stakeholders.

Monitoring and Compliance

R.9: The CAA recommends that all actions or measures identified within the Noise Action Plan should, at a minimum, include indicative timelines. Measures that fall within the airport's control and are planned for implementation over time should be developed in accordance with the Specific, Measurable, Achievable, Relevant, and Time-bound (SMART) framework. The CAA recognises that some actions may lie outside the direct control of the airport; in such cases, airports should clearly define their role in relation to the action, outline any relevant dependencies, and identify any existing contingencies.

R.10: The CAA recommends that DfT/Defra consider the establishment of an oversight function through an extant body or authority or through local authority or planning bodies, to ensure ongoing compliance with the Noise Action Plan.

R.11: The CAA recommends that Defra require airports to produce progress reports at least annually against Noise Action Plans, using an approved mechanism to indicate progress.

R.12: The CAA recognises that land use planning plays a critical role in the ongoing management of noise. The roles and responsibilities of local authorities and developers needs to be streamlined and clarified as the study has identified that there is a trend of population growth or encroachment increasing the size of affected populations despite noise contour areas decreasing. The CAA recommends that the Ministry of Housing, Communities and Local Government (MHCLG), Defra consider facilitating and supporting engagement between the various stakeholders, ensuring effective collaboration to integrate new standards into proposed developments.

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Aviation Noise Attitudes Survey

Together we will

Aviation Noise Attitudes Survey Update

The key questions of the ANAS survey were these ISO standardised questions:

***Q5-8**: Thinking about [time period] when you are here at home, how much does noise from aeroplanes bother, disturb or annoy you?*

- The question was asked regarding "*the last 12 months or so*" (12m) and "*the last three months or so*" (3m).

- Two different answer scales:
  - 5-point **verbal** rating scale with options "*not at all / slightly / moderately / very / extremely*",
  - 11-point **numerical** rating scale from 0 to 10.
- A total of 4 annoyance questions:
  - Q5: 12m, verbal scale
  - Q6: 12m, numerical scale
  - Q7: 3m, verbal scale
  - Q8: 3m, numerical scale.

Defining high annoyance

High annoyance from aircraft noise was defined according to ISO/TS 15666 (2003):

- **HA_v** – All *very* or *extremely* annoyed responses on a 5-point verbal scale (*not at all, slightly, moderate, very and extremely*).
- **HA_{vw}** – 40% of *very* and all *extremely* annoyed responses on a 5-point verbal scale.
- **HA_n** – All responses of 8 or above on an 11-point numerical scale (0 to 10).

By survey question:

Q5: HA_v and HA_{vw} (12m)
Q6: HA_n (12m)
Q7: HA_v and HA_{vw} (3m)
Q8: HA_n (3m)

Analysis Quality Assurance

We have commissioned two pieces of quality assurance on data and analysis in order to derisk the peer review.

- We commissioned an external **statistics expert** to conduct quality assurance of the analysis methodology and outputs.
- This included reviewing the statistical syntax, calculations and outputs.
- The QA process concluded in early September 2025.
- We received feedback from the reviewer and applied it to our methodology.
- The QA process ensured the methodology and results were correct and robust.

- We are in the processing of commissioning an **acoustic data expert** to conduct quality assurance of the processing of integrating the noise dose data into the survey dataset

Next steps: Peer review

The CAA has appointed two external peer reviewers who will conduct:

- A review of **social research components** of the study,
- A review of the **environmental noise components** of the study.

The peer review process is scheduled to commence in mid November.

Following the peer review, the CAA will action feedback from the reviewers and apply any required adjustments to the report.

We also expect to receive recommendations for approaching future research in this area.

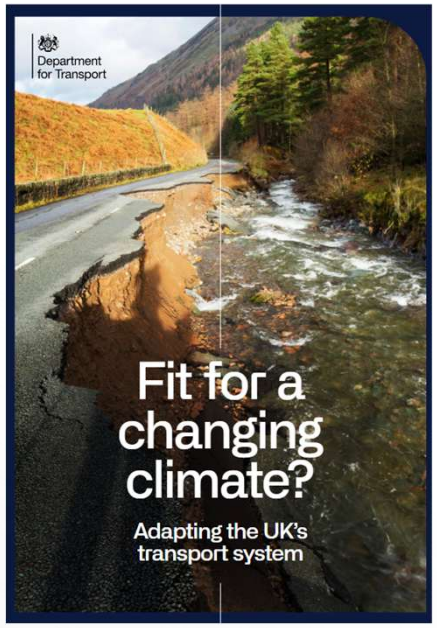
Progress to date

UK Civil Aviation Authority

Climate Adaptation

Together we will

DfT 2024 (Closed) Consultation: Adapting the UK's Transport System to the Impacts of Climate Change



Source: DfT Closed Consultation: Adapting the UK's Transport System to the Impacts of Climate Change

Standardising the approach (from report chapter 6.1)

Adaptation is complex due to uncertainties and knowledge gaps at every stage.

Key challenges include:

- Understanding future climate changes.
- Determining the best risk assessment approach.
- Identifying the most effective adaptation measures.

Solutions:

- Use best practice guidance like **adaptation pathways**.
- Apply standards such as **ISO 14090**.
- DfT is providing tools and evidence to support consistent climate risk assessment and adaptation planning.
- **Climate projections help understand potential scenarios from global warming.**
- **UKCP18** (developed by the Met Office) → Provides climate projections for the UK and globally up to 2100. Includes data on temperature, rainfall, and sea-level rise around the UK.
- **CCRA3** (UK Climate Change Risk Assessment) → Examines scenarios for 2°C and 4°C global temperature rises.

Climate Risks to UK Aviation – Background

The Climate Change Committee (CCC) has written to Emma Hardy MP, Minister for water and flooding at DEFRA, with advice for setting objectives for adapting to a world where climate change is increasingly driving extreme weather events.

The CCC advises that adaptation objectives should be set to be achieved by 2050 at the latest. They should, at a minimum, prepare the country for the weather extremes that will be experienced if global warming levels reach 2°C above preindustrial levels by 2050.

Compared to the 1981 -2010 climate:

- **Heatwaves**: more frequent and widespread at 2°C global warming. Averaged across England, the chance of an officially defined heatwave occurring **doubles** from a 40% chance each year, to close to an 80% chance each year.
- **Drought**: hot dry summers are expected to become more frequent. Averaged across England, the time spent under drought conditions due to low rainfall is expected to **double** at 2°C global warming.
- **Flooding**: at 2°C global warming, **peak rainfall** averaged across the UK is expected to **increase by up to 10–15%** for the wettest days. **Peak river** flows will **increase by up to 40%** for some UK river catchments. **Sea level rise** will continue and accelerate with 15–25 cm of additional sea level rise expected by 2050 for UK coastal cities.
- **Fire weather**: future projections show a **doubling of days** with conditions highly favourable for wildfires over at least 5% of England and Wales at 2°C global warming. They also show a **close to trebling of days** in the peak wildfire month of July from three days per year on average in a 1981 to 2010 climate to approximately eight days per year for the UK as whole. **Wildfire season** will become longer, extending into autumn.
- **Storms**: future changes in UK storms due to global warming remain uncertain at 2°C global warming. However, there is evidence for increased combined impacts from wet and windy conditions generated by UK storms under global climate change. For example, estimates for approximately 4°C global warming suggests potential for a **two to four times** increase in the likelihood of extreme events with both high wind and river flow in the future.

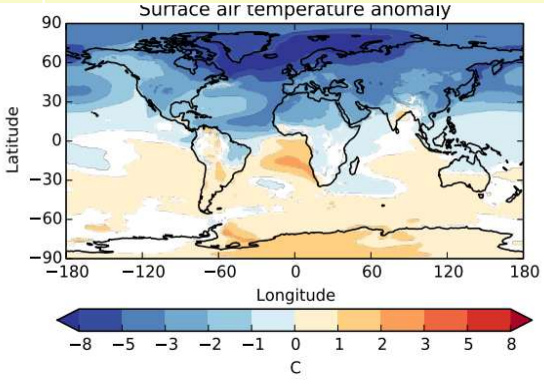
The CCC will publish its “Well Adapted UK report in May 2026.

CCC letter to Emma Hardy MP 13 October 2025

Climate Risks to Aviation – UK Examples - Temperature

In the UK, there is potential for both warmer and colder weather, depending on the resilience of ocean currents.

Scenario	Probability	Impacts
Warmer UK temperatures	Met Office UKCP: • 1 - 4.5 degC warmer UK winters • 1 - 6 degC warmer UK summers	• Disruption due to pavement melting • More thrust/runway needed in take-off • Faster asphalt degradation • More human exhaustion and errors
Colder UK temperatures	• AMOC (Gulf Stream) weakening or collapse: temperatures drop in the UK • Full collapse unlikely before 2100, but feasible	• Disruption due to ice & snow events • High cost of snow equipment and infrastructure • More de-icing chemicals • Higher energy use for heating



Climate Risks to Aviation – What could happen?

UK Civil Aviation Authority

Causal chain

Threats

Events

Conseq-uences

Disruptive threats – relevant to the UK

- Rain, snow and fog – more extreme events (including surface flooding)
- Storms and wind – changing patterns
- Temperatures – significantly increasing/decreasing
- Droughts and wildfires – more severe
- Sea levels – rising with storm surges
- Permafrost (non-UK) – thawing runways (e.g. in Nothern Europe)
- Sandstorms (non-UK) – more severe (e.g. in desert regions)

Operational disruption events – aviation examples

Ground
- Aerodrome surface / access flooding
- Airport buildings overheating -> server failures, wellbeing impacts
- Pavement melting / degradation
- Lightning strikes on ground infrastructure

Air
- Routing inefficiencies and increased fuel burn
- Wind-induced go-arounds and reroutings
- Turbulence-induced safety incidents
- Increased bird-strike risk due to changing migratory/nesting patterns
- UAS unable to fly (e.g. in high wind/rain)

Operational impacts – potential impact categories

- Operational inefficiency and related cost increases
- Infrastructure damage costs
- Safety impacts
- Reduced / changing demand for aviation

Business consequences – examples for UK

- Network capacity limitations
- Insurance market difficulties
- Higher asset and operational costs -> higher ticket prices
- Impaired passenger experience -> lower value for money
- **Reduced aviation activity and lower UK GDP/growth**

Resilience barriers

Recovery measures

To minimise £ losses, Prioritise and invest in:

UK Civil Aviation Authority

Questions and feedback

Together we will

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CAP3157 – consultation on changes to the airspace change process CAP1616

https://www.caa.co.uk/our-work/publications/documents/content/cap3157/

SASIG responses to questions

A1 About you

This response is made by the SASIG – the Strategic Aviation Special Interest Group of the Local Government Association, which is now in its 26th year and comprising 25 member authorities across England with an interest in civilian airports, either as shareholders, landowners or local authorities with a range of relevant statutory responsibilities (e.g. land use planning, environmental health, surface access, economic development, waste management, collection of business rates). We also have strong collaborative links with COSLA in Scotland and the Welsh LGA and engage with a wide range of other stakeholders from multi-authority groupings like HSPG and the component authorities of South Yorkshire, to the UK ACC, parish councils and community groups as Associate Members.

SASIG's is a member of DfT's ANEG group, has been represented on the Airspace Development Board and ACOGS community advisory panel and sits on the CAAs Environmental Information Forum. SASIG's secretariat, who have prepared this response on behalf of the Group's members, have direct hands-on airport management experience and have advised a number of airport entities on airspace and air traffic management issues.

The Group's overarching aim is to promote sustainable aviation on behalf of local communities. Within that ambit, acting SASIG acts as a source of strategic advice, research and networking and a unique voice representing local authority interests as they relate to civil aviation within Whitehall. as a key strategic stakeholder for the CAP1616 airspace change process, reviewing whether airport proposals meet the principles of the ICAO balanced approach, monitoring noise action plans, implementation of conditions attached to airspace change approvals - including and mitigation measure proposed, and the implication of such changes for build development are all tasks which fall to local authorities.

A2 - Proposal 1 A proposal to reduce the number of Gateway approvals required from CAA at existing Stages 1 and 2.

SASIG AGREE to support *Option 3* (the preferred option)

Q5. AGREE – but with some caution that schemes could progress significantly without having taken onboard external CAA review. Option3 will ensure publication of Milestone information on the websites (which we firmly support) and require external CAA approval before proposals move onto a consultation stage and interaction with other airports ACPs.

A Gateway is required to ensure external review of the airport's/UKADS processes and option proposals. In particular, consistency with the airport's long term traffic forecasts, associated masterplan proposals, Noise Action Plan, the ICAO balanced approach, the local development plan and with environmental and community concerns relating to property and receptors under current and proposed new airspace arrangements all require detailed external scrutiny at this stage. This also means that it is at this stage that better information and engagement should be made mandatory and CAA should offer further guidance on what this should look like in consultation with SASIG and other community representatives.

A3 Proposal 2 Refining the definition of roles of proposer, change sponsor and partner

Q7 No comment, other than to say that it is still incongruent that Third Parties such as LAs do not have the right to prepare airspace changes, or variations to those that are but forward by airports, that meet produce objectively better outcomes in terms of environmental and community impact, or in terms of avoiding sterilisation of important development opportunities because of airspace routings. This will become very important as ACPs for droneports and vertiports become more common.

A4 – Proposal 3 Creating a new set of standard design principles which apply to all airspace change proposals

Q9. DISAGREE – This proposal implies restrict the Design Principles to a standard set which in turn lean heavily on the generic Air Navigation Guidance and Directions. Currently the guidance given in the ANG 2017 are very restricted and is also in process of review, change and public consultation by DfT – so the intentions and implications of CAA guidance relying on the DfT ANG are unclear. SASIG are concerned that standardization will reduce sensitivity to local circumstances and could curb innovation.

Notably – the ANG 2017(2.49) refers only to engagement on airspace design with 'elected representatives' – rather than *Local Authorities* as organisations (in contrast to references to the like of National Parks given). It is essential that both the revised ANG and CAP1616 ensure engagement with Local Authorities at both technical and political level – LAs have a large number of responsibilities and duties (see A1 above) that closely relate to airports and use of airspace – not least environmental pollutions and protections, health and wellbeing, economy and land use planning.

We note is that the CAA do NOT see the airspace design process as the vehicle for determining the scale of appropriate use of an airport / airspace – this matter is seen to be determined by the land use planning processes (including TCPA and NSIP – thus underlining the vital interaction of airspace and land use planning processes) that must be better recognised and integrated in the CAP1616 and AMS processes. There is a strong argument for saying

that new airport capacity should be made conditional on adequate airspace capacity being available to accommodate it in a sustainable way, and that proposals to generate airspace capacity beyond that required by the approved capacity of the airport in question is not required and therefore should not be permitted other than where it demonstrably improves environmental benefits for impacted communities. This should be stated in CAP1616.

National Design Principles should require the inclusion of locally bespoke DPs developed with local stakeholders to address local circumstances. For example, requirements of runway and flight path alternation to provide respite and relief in the locally define most impactful manner, night flying restrictions, avoiding the overflying particularly sensitive areas local areas defined with stakeholders etc.

In addition, there may be strategic scale Design Principles (addressing groups of airports and flightpaths for example) – for instance managing the interaction of flightpaths to two airports over one area on the ground so that meaningful respite and relief can be achieved by the 'system'.

Q10. SASIG strongly AGREE that a change sponsor should engage with stakeholders on local issues and circumstances – see response to Q 9. We also wish to highlight the importance of the Fair and Equitable Distribution (FED) report and ask that the review of CAP1616 includes an objective of embedding the FED Framework into regulation, encouraging earlier community engagement to take place.

A5 Proposal 4 - Reduce number of appraisals

Qs 11, 12 **-** No comment

A6 Proposal 5 – Combine Stage 1 and 2

Q13, SASIG AGREE that Stage 1 and Stage 2 be combined. This should make the process faster and more efficient.

Q14. SASIG AGREE with the proposed high-level overview of requirements. This is because it is important to identify local issues at an early stage so that they can be addressed later.

A7 Proposal 6 – Remove requirement for CAA to assess initial and full options appraisals?

Q15. SASIG AGREE BUT ONLY IF LOCAL AUTHORITIES HAVE BEEN GIVEN THE CHANNCE TO REVIEW APPROVE INITIAL OPTIONS AND OBJECT TO THEM BEING TAKEN FORWARD FR FULL APPROVAL WHERE THEY DO NOT – while the desire to reduce unnecessary delay for external reviews of UKADS by CAA is recognised, SASIG are concerned that:

1) options appraisals do genuinely address all possible realistic options, and
2) that designers are 'open' to ideas and proposals emanating from outside of their internal 'group think'.

Therefore, the optioneering process should be robustly externally scrutinised in a timely way. Leaving this only to the end of the process risks missing options and potentially significant delay if untested options then need to be assessed.

Q16. SASIG DISAGREE about reducing the number of metrics in options appraisal as a pre-determined measure; however if LAs agree that not all are relevant then there could be agreement to reduce the number and speed up the process. This would be a major incentive for an ASP to engage early with LAs and to take their views into account. Although efficiency benefits are desirable care must be taken to ensure thoroughness and transparency are maintained.

Q17. SASIG is UNSURE about the shortened list of metrics proposed. The stated aim is to compare costs/benefits of different design option(s), so the removal of some cost elements does not appear consistent? It is also suggested that the appraisal metrics need not be the same as those used by the proposed UK airspace oversight review process.

Q18 – SASIG are of the opinion that the current air noise metrics do not have sufficient regard to the harms caused to health and well-being of people living in impacted communities. This is a critical issue for us.

Airspace change must be informed by the scientific evidence on the adverse effects of noise and health and by metrics that properly represent the lived experiences of communities. An example of this are metrics which may emerge from the "Longitudinal Study to evaluate the Quality of Life and Health Effects of the Heathrow Noise Insulation Schemes" and the Aviation Night Noise Effects (ANNE) studies.

A9 Proposal 8 – UKADS to perform full and final options appraisals

Q19 SASIG DISAGREE that the UKADS provider should be required to only perform an assessment of the end state design - because the provider may not be fully informed at the initial stage. There is also a very major concern about one body (UKADS) 'marking its own homework'; this needs to be avoided at all costs for fairness and propriety reasons.

Q20 SASIG AGREES that the UKADS provider should not be required to quantify and/or monetise each deployment stage, but it should be aware of the outcomes.

Q21 SASIG DISAGREES. While we consider that 10 years may be an appropriate duration in most cases – but discretion must exist to assess other durations that address the expected deployment period. e.g. Full utilisation of a new 3rd runway at Heathrow is forecast to take much more than 10years from first use.

Q22 NA

A10 Proposal 9 UKADSs to assess combined and cumulative impacts at Stage 4

Q23 AGREE

Q24 DISAGREE It is essential that assessment is carried out up to 7,000 feet (rather than 4000ft) to ensure that cumulative impacts are not excluded. To describe this as unmanageable and dismiss the issue is not acceptable. This is another major issue for us statutory authorities and elected community representatives.

Q25 Awakenings from aircraft noise measured using physiological and self-report metrics, focusing on the probability of waking or sleep disruption from noise events, should be included. It is expected that metrics like LAmax for individual events or (Lnight) for overall

night-time exposure, linking noise levels (dB) to the likelihood of awakening, sleep stage changes would be utilised. Existing metrics include PAWR (Probability of Aircraft-induced Wake-up Reaction) and standard noise metrics like (Len) and (Lnight)

A11 Proposal 10 – Remove 12weeks standard requirement on consultations

Q26 SASIG DISAGREE – Unless this is done with explicit Local Authority agreement. Whilst we recognise that new and innovative forms of consultation, publicity and engagement processes, including a series of highly targeted engagements and smaller, less significant or pre-agreed airspace change proposals, enable a more flexible approach to be taken to 'standard' timing requirements. However, SASIG do require significant reassurance that that Gunning principles and adequate time is available to enable busy democratically run organisations to respond, particularly to the major public consultations stages, for which 12 weeks is a realistic and proven standard timescale.

Arguably, as important an issue than timing is that need for consultation material to be relatable to the audience appropriate to the question. e.g. The London TMA system covers an enormous population and geography – a particular community will be interested in what directly overflies or impacts their area, an airport or airline interested in a particular flight path or operation.

Too often no relatable and relevant outputs are available or details become 'buried' in huge system wide consultation. This could mean that effective engagement in centralised UKADS led system wide engagements will be ineffective unless great care is taken and planned engagements are sensitively targeted and 'tested' with relevant stakeholders before formal public consultations commence. Individual airports such as Heathrow have established the relationships with local stakeholders to do this – CAP1616 should ensure this strength is built upon and not lost in a UKADS sponsored standardised and system wide approach.

A12 Proposal 11 – Public evidence sessions

Q27 AGREE – public evidence sessions appear beneficial for transparency and enable early stage engagement with local communities / LAs that are most impacted by a particular emerging proposal. What constitutes a 'high level of interest'?

Q28 AGREE

A13 Proposal 12 Cease the productions of draft decisions for checking purposes

Q 29 No Comment

A14 Proposal 13 – Consolidate Stage 5 Decide and 6 Implement

Q30 No comment

A15 Proposal 14 Guidance on the type of information UKADS provide stakeholders prior to any deployment

Q31 AGREE – see response to Q26 – the information provided must be clear and *relatable* to the audience impacted by an individual deployment.

A16 Proposal 15 Post Implementation Review

Q33 AGREE PIR is often quite misunderstood. The fact that it is not a review of the decision on airspace change may not be clear to local communities. A general point to make is that all too often local communities first become aware of air space changes during the implementation stage. As a result, the post implementation review becomes viewed as an opportunity to influence decision making. Generally, more should be done to ensure communities are aware of proposed air space changes at an earlier stage.

Q34 AGREE

Q35 SASIG would like to see aircraft noise complaints monitoring included

Q36 DISAGREE Due to the slow slot allocation change process and timescales taken for operations to build up to utilise newly released capacity, a period of longer than 12 months could be needed for post implementation changes to take full effect.

A17 Proposal 16 – RNAV, PBN for pre-scale airspace change proposals

Q37 No comment

A18 Proposal 17 BVLOS

Q38 DISAGREE and Q39 DISAGREE

SASIG have no comments on the proposals for genuine occasional uses below 500ft that are questioned.

However, SASIG consider a potential proposal for a new mode of operation to provide deliveries by very low flying BVLOS drone from a vertiport base to serve multiple 'home' delivery destinations to fall outside of the provision of Proposal 17 – as the experience of the proposals by Amazon at Darlington, and the conditions imposed by the authority because of local concerns about disturbance demonstrate, this will require far more scrutiny and consideration with a range of stakeholders including local planning authorities.

A19 Migration policy

Q40 No comments

A20 Anything else?

Q41 – See response to Q38-39. We note the CAA's Future of Flight BVLOS Roadmap (CAP3182 October 2025) – this highlights the rapid pace to deployment of BVLOS UAS systems and eVTOL taxis etc operating on a regular basis at lower levels of airspace (below 4000 or 7000ft?) including to access new landing sites ((vertiports) or licensed facilities in existing non-licensed airfields, or to access existing larger commercial aerodromes such as Heathrow.

CAP1616 needs to be much clearer now about any special provisions or relaxations to be made for these operations. This is needed quickly - as the necessary T&CPA planning applications for location of landing sites and the scale of operation will be needed first - which may include assessment of noise and non-acoustic flight impacts. The interaction of the two regimes needs to be improved including for any special provisions in CAP1616 in relation to AAM.

CAA needs to engage far more extensive with SASIG and other LA representative organisations like COSLA, the Welsh LGA, HSPG - and indeed the LGA itself, before adopting this kind of policy in the final CAP 1616 update. LAs roles are critical to this process and the presentation of this policy approach, in this document, in this way, feels like the equivalent of a drive by rather than stopping to ascertain whether and how vehicles should be allowed to traverse, with political representatives of the communities they affect.

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Policy Director
SASIG Secretariat

SASIG Response to:

UK ETS Aviation Free Allocation Phase-Out: Unintended Consequences for Regional Connectivity

Purpose: This response identifies a series of important unintended consequences of the proposed UK ETS free allocation phase-out for regional aviation; it draws upon a more comprehensive evidence shared by RABA with SASIG, which they submitted to the DESNZ/DfT consultation.

Key Recommendation: Exemption of domestic aviation and airports less than 3 million passengers annually from UK ETS obligations to prevent route closures, connectivity loss, and paradoxically increased net emissions.

EXECUTIVE SUMMARY

Official consultation documents frame UK ETS free allocation removal as a carbon reduction measure. However, the comprehensive evidence that RABA compiled (and shared with SASIG) using a sophisticated bespoke multi-modal carbon model, reveals the policy will:

A. **Increase net carbon emissions** by forcing modal shifts to surface transport which has extensive infrastructure and therefore considerable embedded carbon, poor load factors (other than on corridors between major cities) and in many cases diesel power units with substantial carbon footprints; on cross-country and cross water routes and those serving low density rural and remote populations, the most efficient aircraft produce materially less CO_2 than a car + ferry on cross-water routes, or in some cases rural rail services with multiple stops.

B. **The aviation emissions detailed in the consultation are overstated by at least 50%**, sometimes more, because the methodology used to generate the carbon footprint data in the consultation appears to employ generic factors which are not route specific.

C. **Destroy regional connectivity** serving 2.77 million annual passengers across island communities, Highlands, Cornwall, Wales, Northern Ireland and peripheral regions—with £702m GVA losses and 10,400 jobs at risk from route closures between 2026-2033; and 19.7 million annual passengers across all UK commercial airports of less than 3mppa, around 6.5% of the total.

D. **Create competitive distortion** by imposing carbon costs exclusively on aviation (already contributing £3.84bn net to Treasury) whilst road transport (£23.2bn net contributor) and rail (£16.3bn net subsidy recipient) face no UK ETS obligations—despite road emissions being 78× larger than domestic aviation.

THE SCALE ISSUE: TRIVIAL EMISSIONS, CRITICAL CONNECTIVITY

UK domestic aviation represents just 0.3% of UK GHG emissions (1.42Mt CO_2e vs 481Mt total) yet provides essential connectivity for 15% of all UK air passengers across 80% of airports (including those with more than 3mppa. The consultation's narrow focus on solely direct aviation emissions ignores:

- **Modal substitution emissions:** Analysis of 49 domestic routes shows aircraft emissions are LOWER than alternatives on 59% of routes. Closing these routes forces passengers onto car + ferry (136.0 kg CO_2/passenger vs 40.4 kg aircraft) or train and ferry combinations (148.3 kg vs 40.4 kg) - generating an estimated 48,000 additional tonnes CO_2 annually from cross-water routes alone.

- **Methodological overstatement:** DESNZ conversion factors apply inappropriate 1.7-1.9 × Radiative Forcing Index multipliers to short-haul flights of less than 620 miles (1,000 km), many of which cruise at less than 27,000 or if over that altitude remain there for only very short periods. The effect is to inflate aviation emissions by 50-100%. Peer-reviewed European research (German Federal Environment Agency 2020, Eco-Passenger 2016) demonstrates short-haul domestic flights have RFI values of 1.27-1.47, not 1.7× that DfT currently uses as standard. It also does not consider the 2% SAF blend which all airlines have been mandated to use since 1 January 2025.
- **The Civil Aviation Authority**: Has also decided to develop its own carbon model to address these deficiencies and ensure policy and regulation if founded on accurate data and sound modelling assumptions.
- **Route-specific efficiency:** Distance analysis shows aircraft carbon advantage increases with distance—on routes >350 miles (560 km), aircraft produce 59% less CO_2 than trains (60.8 kg vs 146.6 kg). Even on routes <150 miles (240 km), aircraft are competitive with trains (27.1 kg vs 32.9 kg) and vastly superior to cars (99.5 kg).

EXEMPLAR AIRPORTS: A UK-WIDE CRISIS

The UK ETS free allocation phase-out threatens essential connectivity across all UK nations and regions. Analysis of five exemplar airports demonstrates this is not just a Scottish Highlands issue alone as the consultation document implies, but a systemic threat to remote, rural, deprived urban and cross-water constituencies throughout the United Kingdom:

1. Doncaster Sheffield Airport (Yorkshire): Closed November 2022, planned reopening 2027 now jeopardised

• *Served 1.44m passengers in 2019 before closure* - represents vital business and transport connectivity for South Yorkshire and Lincolnshire.

• *Route analysis shows aircraft 17-46% more carbon-efficient than alternatives* on key domestic routes to Belfast, Jersey and Scotland.

• *ETS costs of £4-8/passenger would make thin domestic routes unviable* from day one of reopening, potentially rendering the entire £90m reopening investment un-economical.

• *Catchment serves some of England's most deprived constituencies* - closure compounds regional inequality highlighted in Hendy Review.

• *Ministerial exposure*: Ed Miliband (Doncaster North MP, Secretary of State for Energy Security and Net Zero) responsibilities include this UK ETS policy, which could undermine efforts to re-open Doncaster Airport in his own constituency by making domestic routes very difficult to attract. Questions will be asked and his attention should be drawn to this juxtaposition.

2. Newquay Cornwall Airport (South West of England): 0.4m passengers, peninsula isolation exemplar

• *Geographic isolation*: 387 miles from Edinburgh, 68 miles from Scilly—alternative surface transport adds 8-10 hours per journey

• *Carbon advantage of air is dramatic*: Aircraft produce 70% less CO_2 than alternatives on Edinburgh route (45.5 kg vs 151.2 kg train); 71% less on Scilly route (22.3 kg vs 76.2 kg)

• *Cornwall's tourism-dependent economy* (15% GDP) critically relies on air connectivity—£54m GVA at risk from domestic route closures

• *Union Connectivity Review* specifically identified improving connectivity to peripheral regions like Cornwall as levelling-up priority

3. Cardiff Wales Airport (Wales): 0.66m passengers, devolved nation connectivity at stake

• *Hendy Review* emphasised that 75% of Welsh inter-regional journeys cross-border with England - air links essential for Wales-Scotland and Wales-Northern Ireland connectivity

• *Multimodal carbon analysis shows aircraft more efficient on key routes*: Cardiff-Glasgow (considering diesel stock on Welsh rail network); Cardiff-Belfast (considering ferry emissions); Cardiff-Edinburgh and Cardiff-Newcastle routes

• *Welsh Government analysis*: 1.19m passengers leak to Bristol annually, generating 24,000 tonnes terrestrial CO_2—equivalent to proposed Cardiff PSO route emissions. Losing Cardiff routes would compound this leakage

• *Offsetting cost for mature 2024 Cardiff domestic network*: just £1.23/passenger—trivial compared to £4-8 ETS burden threatening route viability

4. City of Derry/Londonderry Airport (Northern Ireland): 0.27m passengers, cross-border and cross-water exemplar

• *Serves catchment in the west of Northern Ireland* – provides a unique cross-border situation requiring air connectivity for access to both UK mainland and Dublin

• *Analysis of LDY-LHR PSO route* shows aircraft dramatically more efficient than car + ferry alternatives when ferry emissions properly accounted for.

• *Geographic isolation from Belfast* (71 miles) means catchment leakage generates substantial terrestrial emissions—estimated 15,000+ tonnes annually from passengers driving to Belfast/Dublin

• *Critical for Northern Ireland connectivity post-Brexit* - Union Connectivity Review identified domestic aviation as essential where journeys are too long for road/rail alternatives.

5. Inverness Airport (Scottish Highlands): 0.69m passengers, remote geography exemplar

• *Geographic extremity*: Serves Europe's most sparsely populated region—9,688 km² with 76,903 population (Inverness, Skye and West Ross-shire constituency). Routes to London 443 miles, Belfast 216 miles with no viable surface alternatives under 6-9 hours journey time.

• *Dramatic carbon efficiency*: Analysis shows 78% aircraft carbon advantage across Highland routes due to extreme distances and circuitous surface transport. Aircraft average 34.8 kg CO_2/passenger vs Train 158.6 kg vs Car 161.4 kg—demonstrating aircraft produce less than quarter the emissions of alternatives.

• *Critical island connectivity*: Serves Orkney (Kirkwall), Shetland (Sumburgh) and Western Isles (Stornoway) routes where aircraft emissions 80%+ lower than ferry alternatives when sea crossing emissions properly accounted for. These island communities (combined population ~45,000) depend on air links for healthcare, education, economic activity.

• *Hendy Review specific mention*: Union Connectivity Review identified northern Scottish regions as requiring aviation connectivity where journeys 'too long to be reasonably taken by road or rail'—yet these precise routes face unviability from ETS costs.

• *Energy sector dependency*: Aberdeen-Inverness corridor supports offshore renewable energy sector (projected £25bn+ investment 2025-2030 in offshore wind). Loss of air connectivity threatens skills mobility essential for Net Zero infrastructure delivery.

Common Characteristics Across Exemplar Routes and Airports:

These include:

• *Per-passenger regulatory costs 5-7× higher than major hubs* (£35/pax vs £5-10/pax)

• *Thin route economics* - typical load factors 50-65% vs 85%+ at major airports, making marginal routes vulnerable to any cost increase

• *Limited operator alternatives* - only Loganair, Aurigny and Emerald Airways are left that operate suitable aircraft for thin routes; if any of them withdraw, backfilling will become impossible.

• Lingering COVID debt burden limiting capacity to invest in fleet renewal and route expansion

• Affected airports and air services mainly serve catchments that are remote, rural, economically-deprived, or require cross-water connectivity – these are precisely the 'left behind' communities that the Government has committed to address under its territorial in-equalities agenda.

Further data supporting this analysis can be found in Appendices A-C.

CUMULATIVE BURDEN: THE UNFAIR COMPETITION ISSUE

Consultation documents characterise UK ETS as a market mechanism distinct from taxation. This obscures the reality that aviation already faces disproportionate cumulative government intervention:

Sector	Revenue to Gov't	Gov't Spending	Net Position
Aviation	£3.99bn	£0.15bn	+£3.84bn
Road	£37.00bn	£13.80bn	+£23.20bn
Rail	£1.50bn	£17.80bn	-£16.30bn subsidy

UK ETS Impact: Aviation: £90m (2026) rising to £320m+ (2030) | Road: £0 | Rail: £0 (upstream coverage only)

Critical asymmetries officials may not have highlighted:

- **Regulatory cost burden:** Aviation self-funds 100% of security infrastructure, ATC charges, and Border Force costs—state-funded in comparable EU jurisdictions. Small regional airports face per-passenger costs 5-7× higher than major hubs (£35/pax vs £5-10/pax).
- **Taxation differential:** Aviation pays £3.8bn APD annually—road and rail pay no equivalent passenger duty. APD already constitutes carbon pricing (£7-224 per passenger).

ETS coverage anomaly: Road transport (110.7Mt CO_2, 78× domestic aviation's 1.42Mt) faces zero UK ETS obligations. Rail benefits from upstream ETS coverage of power generation without direct operator cost.

THE UNION CONNECTIVITY REVIEW: POLICY CONTRADICTION

Sir Peter Hendy's (now Lord Hendy's) Union Connectivity Review (November 2021) provides authoritative government-commissioned evidence that directly contradicts the UK ETS free allocation phase-out approach:

Key UCR Finding: Domestic aviation essential where journeys too long for road/rail

The Review explicitly recognised that 'domestic aviation is sometimes the only option where journeys are too long to be reasonably taken by road or rail' and recommended the Government 'take measures to improve domestic aviation connectivity through revising subsidy rules, reducing tax and by intervening in the assignment of slots at London airports.'

Recommended Actions (UCR Final Report):

a. Revise subsidy rules to support regional aviation connectivity

b. Reduce taxation burden on domestic flights (specifically recommending APD reform for routes 'not realistic by rail')

c. Intervene in London airport slot assignments to prioritise domestic flights where no viable surface alternative exists

d. Support sustainable aviation fuel plants in parts of UK 'particularly reliant on aviation for domestic connectivity' (specifically mentioning Northern Ireland and northern Scotland)

The Contradiction:

Whilst Hendy Review recommended REDUCING taxation and IMPROVING connectivity for routes without rail alternatives, the UK ETS consultation proposes INCREASING costs by £90m-£320m annually on precisely these routes. This represents policy incongruence at the highest level—one arm of government (DfT-commissioned review) recommends support whilst another (DESNZ/DfT ETS consultation) implements measures that will destroy the connectivity Hendy identified as strategically essential.

UKNET Strategic Transport Network:

The UCR's central recommendation—creation of UKNET, a multi-modal pan-UK strategic transport network—explicitly includes domestic aviation as a critical component. The Review emphasised that 100% of respondents in Scotland, Wales and Northern Ireland supported UKNET development. Yet UK ETS policy proceeds without considering implications for this government-endorsed strategic framework.

THE REGIONAL IMPACT: COMMUNITIES AT RISK

Route viability analysis shows ETS costs will make thin regional routes commercially unviable between 2026-2033, creating cascading economic damage:

- **Immediate risk (2026-2028):** 19% of passengers on thin routes face immediate service loss as ETS costs exceed 5% of ticket price (£4.25 on £85 average fare). At £45/tonne carbon price, high-emission routes (>90kg CO_2/passenger) become unviable immediately.
- **Medium-term threat (2029-2033):** As carbon prices rise to £80/tonne (2030), additional routes covering 2.77m annual passengers become unviable—including essential island connections to Orkney, Shetland, Western Isles, Channel Islands, Cornwall and cross-water routes to Northern Ireland.
- **Economic devastation:** Full domestic service loss scenario quantifies £702m regional GVA loss, 10,400 jobs destroyed, plus £71m annual losses from increased journey times (4-9 hours additional travel per trip).
- **Geographic inequality:** Peripheral regions already lag UK GDP growth by 1.5-2% annually. Loss of air connectivity compounds existing economic disparities, directly contradicting levelling-up commitments and Hendy Review recommendations to improve connectivity for remote regions.

WHAT THE CONSULTATION DOES NOT HIGHLIGHT

1. SASIG's concerns about data quality: SASIG (like RABA) have raised concerns with the Civil Aviation Authority over the quality of data and modelling providing the evidence to under-write the current UK ETS policy for Aviation. We have expressed significant reservations about DESNZ conversion factor reliability for aviation emissions to the CAA and they have indicated that they recognised our concerns. It is notable that the CAA is currently developing its own carbon model to address these deficiencies—suggesting official impact assessments could be significantly flawed and not provide a sound evidence base for decision-making.

2. The 'backfilling' assumption is unrealistic: Consultation assumes route closures would be 'backfilled' by other operators. Reality: only two regional airlines (Loganair, Eastern Airways) operate aircraft suitable for thin routes serving island/remote communities. If they withdraw, replacement is impossible—infrastructure loss is permanent.

3. Union Connectivity Review contradiction: Hendy Review (government-commissioned) recommended REDUCING tax burden and IMPROVING domestic aviation connectivity. Yet this consultation proposes adding £90m-£320m annual costs to precisely the routes Hendy identified as strategically essential. Policy incoherence at ministerial level.

4. EU precedent supports exemptions: EU ETS exempts PSO routes in outermost regions and routes <50,000 seats annually. UK consultation proposes no equivalent protections despite serving similar isolated communities. Scotland's Islands Act 2018 requires impact assessment for policies differentially affecting island communities - this analysis appears to be absent from the current consultation.

5. The timing problem: Free allocation phase-out proceeds in 2026 regardless of SAF infrastructure readiness, electric aircraft development, or alternative decarbonisation pathways. Regional operators face costs now with no viable mitigation technology available until 2030s at earliest.

6. Airport National Policy Statement: There are no plans for this policy review promoted by the Chancellor to include any policy commitments in relation to UK regional aviation, airfreight or indeed small airports of the kind highlighted in this briefing; it appears likely to focus solely on a third runway at Heathrow and the needs of London and the South East which will be presented as 'national'. But given the requirement for NSIPs to be

confirmed by affirmative resolution, the absence of coherent regional aviation policy risks being interpreted as a direct snub by MPs with constituencies in the Labour Government's heartlands when it comes to a vote.

RECOMMENDATIONS

Based on this comprehensive evidence, as set out in our consultation response, the RABA Group urges immediate policy intervention:

1. Exempt all UK domestic routes from UK ETS obligations (representing 0.3% UK emissions, 3.6% aviation emissions, yet providing essential connectivity for 15% of passengers); replacement by surface modes would generate as much if not more carbon emissions.

2. Exempt airports with less than 3 million passengers (or dedicated business, cargo and special mission aviation facilities) where per-passenger costs are 5-7× higher and routes are marginal.

3. If exemptions declined, implement revenue recycling: Ring-fence UK ETS auction revenues from aviation for SAF infrastructure, regional route support, airport decarbonisation grants, and offset of disproportionate regulatory costs.

4. Commission holistic transport intervention review: Independent analysis of cumulative net financial impact across aviation, road, and rail—considering taxes, subsidies, regulatory costs, and infrastructure investment—to inform proportionate carbon pricing policy

5. Align with Union Connectivity Review recommendations: Ensure UK ETS policy supports rather than contradicts Hendy Review's recommendations to improve domestic aviation connectivity for routes without viable surface alternatives

CONCLUSION

Official consultation documents frame this as environmental policy. Evidence demonstrates it is de facto economic policy with severe unintended consequences across all UK nations:

• Net carbon emissions will INCREASE through forced modal shifts

• Regional connectivity from the airports considered represents 2.77m passengers across England, Scotland, Wales and Northern Ireland and the UK ETS proposals for aviation may well precipitate a collapse of this component of the sector if not dropped or modified

• £702m GVA and 10,400 jobs in peripheral regions at risk—compounding levelling-up challenges

• Competitive distortion worsens as aviation (£3.84bn net contributor) bears additional costs whilst road (£23.2bn contributor) and rail (£16.3bn subsidy) face none

• Direct contradiction of Union Connectivity Review recommendations to support domestic aviation for routes without viable alternatives

• There will be political risks generated in South Yorkshire, Wales, Scotland, and Cornwall if air services are lost and airports closed with significant knock-on consequences for local economies; optics would raise questions about the Government's commitments its regional inequalities agenda.

The proportionate response is targeted exemptions for domestic aviation and regional airports—preserving connectivity, preventing perverse carbon outcomes, maintaining fair competition across transport modes, and aligning with government's own Union Connectivity Review strategy whilst protecting Labour's electoral coalition in marginal constituencies.

SASIG would welcome the opportunity to provide detailed briefing on these issues at the at DfT/DESNZ convenience.

APPENDICES

APPENDIX A: Key Data Summary

Emissions Context

• UK domestic aviation: 1.42Mt CO_2e (0.3% UK total, 3.6% aviation total)
• UK road transport: 110.7Mt CO_2e (78× domestic aviation)
• UK total GHG emissions: 481Mt CO_2e (2019 baseline)

Route-Specific Carbon Analysis (C-Squared Model)

• 49 domestic routes analysed across 6 smaller airports
• Aircraft lowest emission option on 59% of routes (29/49)
• Cross-water routes: Aircraft 40.4kg CO_2/pax vs Car+ferry 136.0kg vs Train+ferry 148.3kg
• Routes >350 miles: Aircraft 60.8kg vs Train 146.6kg (59% advantage)
• Inverness routes: 78% aircraft carbon advantage due to remote geography

Financial Burden Comparison (Annual)

• Aviation: £3.99bn revenue to government, £0.15bn spending = +£3.84bn net
• Road: £37.00bn revenue, £13.80bn spending = +£23.20bn net
• Rail: £1.50bn revenue, £17.80bn spending = -£16.30bn subsidy
• UK ETS costs: Aviation £90m (2026) to £320m+ (2030) | Road £0 | Rail £0

Regional Economic Impact

• 2.77m annual passengers at risk on thin routes
• £702m regional GVA loss from full domestic service closure
• 10,400 jobs threatened across regional aviation sector
• £71m annual value of time lost (4-9 hour journey increases) – over ten years this amounts to £100's of millions
• 48,000 tonnes additional CO_2 from modal shifts on cross-water routes

APPENDIX B: Exemplar Airport Analysis

Airport	Pax (mppa)	Aircraft CO_2 Advantage	UK Region / Political Context
Doncaster Sheffield	1.44 (2019)	17-46% lower	Yorkshire/England - Ed Miliband constituency
Newquay Cornwall	0.28	49-71% lower	South West England - Labour marginal 2,470
Cardiff Wales	0.66	Variable by route	Wales - Bellwether Vale of Glamorgan
City of Derry	0.27	Dramatic on ferry	Northern Ireland - Post-Brexit sensitivity
Inverness	0.69	78% lower	Scottish Highlands - SNP recovery risk
Guernsey	0.66	73% lower	Crown Dependency - Island dependency
Southampton	0.66	47-51% lower	South England - Channel Islands links
Aberdeen	1.30	11-44% lower	Scotland - Energy sector & islands

Key Observation: Five exemplar airports demonstrate UK-wide issue affecting England (Doncaster, Newquay), Scotland (Inverness), Wales (Cardiff), Northern Ireland (City of Derry)—not a localised Scottish problem as consultation framing might suggest. All five serve Labour marginal constituencies or politically sensitive regions critical to government's 2029 electoral prospects.

APPENDIX C: Route Viability Timeline

Period	Carbon Price	Routes at Risk	Impact
2026-2028	£44-57/tonne	High emission >90kg	Immediate risk: 19% thin route passengers
2029-2031	£65-92/tonne	Medium emission 60-90kg	Island/cross-water routes threatened
2032-2035	£106-121/tonne	Low emission 40-60kg	System-wide thin route collapse
2050	£409/tonne	All without SAF/electric	Only zero-carbon aviation viable

APPENDIX D: Union Connectivity Review Key Findings

Relevant UCR Recommendations (Final Report, November 2021)

1. 'Take measures to improve domestic aviation connectivity through revising subsidy rules, reducing tax and by intervening in the assignment of slots at London airports'

2. 'Support the development of sustainable aviation fuel plants in parts of the United Kingdom that are particularly reliant on aviation for domestic connectivity' (specifically mentioning Northern Ireland and northern Scotland)

3. Design and implement UKNET—a strategic transport network for the whole of the UK, explicitly including domestic aviation as critical component

4. Recognise that 'domestic aviation is sometimes the only option where journeys are too long to be reasonably taken by road or rail'

Prime Minister's Response (November 2021)

Then Prime Minister Boris Johnson welcomed Hendy's recommendations as 'an inspiring vision for the future of transport' and committed to 'set up a strategic UK-wide transport network that can better serve the whole country with stronger sea, rail and road links—not only bringing us closer together but boosting jobs, prosperity and opportunity.'

The Policy Contradiction

Hendy Review: Government should REDUCE tax and IMPROVE connectivity for domestic aviation
UK ETS Consultation: Government proposes INCREASE costs by £90m-£320m annually on domestic aviation

Result: Direct contradiction between DfT-commissioned strategic review and DESNZ/DfT carbon pricing policy

APPENDIX E: Evidence Sources and Contacts

Submitted Documents

- RABA Group UK ETS Consultation Response (December 2025) - Core policy arguments
- Technical Addendum: Multi-Modal Carbon Analysis (C-Squared Model) - Route-specific emissions data
- Financial Intervention Addendum - Cumulative taxation and subsidy analysis
- Distance-Based RFI Multipliers Addendum (C-Squared) - Methodological critique
- RABA Group Submission to Union Connectivity Review (June 2021) - Regional aviation policy context
- Multimodal CO_2 Comparator Assessments - City of Derry Airport (May 2021)
- Cardiff Wales Potential Domestic Routes Analysis - Carbon and economic assessment

Key References

- Union Connectivity Review Final Report (Sir Peter Hendy, November 2021) - Government-commissioned strategic transport review
- German Federal Environment Agency (UBA) 2020: Integration of Non-CO_2 Effects
- EcoPassenger 2016: Environmental Methodology and Data Update (EU-funded)
- Lee et al. 2021: Aviation Climate Forcing 2000-2018 (Atmospheric Environment)
- CAA UK Aviation Environmental Review 2025 (new carbon model development)
- UK Committee on Climate Change: Sixth Carbon Budget (2020)
- DfT Transport Analysis Guidance (WebTAG) - Value of time methodology
- ACI Europe 2024: Economic Impact of Airports
- Scotland's Islands Act 2018 and National Islands Plan

Contact Information

Strategic Aviation Special Interest Group (SASIG)
Chair: Keith Artus
Email: secretariat@sasig.uk.org
Website: www.sasig.uk.org

Technical Analysis Partners

Northpoint Aviation Services - Regional aviation consultancy
C-Squared - Multi-Modal Carbon Modelling
Date: December 2025

Note: *This briefing synthesises key findings from comprehensive evidence submitted to the DESNZ/DfT consultation (closing December 19, 2025). Full technical documentation, detailed route-by-route analysis, and supporting research available on request. SASIG welcomes opportunity for detailed ministerial briefing to discuss UK-wide implications for regional connectivity, Union Connectivity Review policy coherence, proportionate exemptions framework, and political risk mitigation for Labour marginal constituencies.*

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Air Navigation Directions & Guidance Consultation Response – SASIG

Organisation: SASIG (Strategic Aviation Special Interest Group) of the Local Government Association (LGA).

Represents: UK local authorities with statutory responsibilities in relation to airports, including planning authorities, environmental health authorities, transport authorities and elected democratic bodies for communities surrounding airports. Its key aim is to ensure that UK aviation policy is implemented in a manner that reconciles economic, social and environmental issues appropriately.

SASIG provides local authorities across England and Wales that have a strategic or local interest in aviation issues and who are all facing similar aviation-related issues and challenges, with up-to-date information and policy advice on the sector and it also provides a collective voice with which to engage with Government and other relevant stakeholders. SASIG develops policy position papers and campaigns on aviation issues of the greatest interest to local communities and their political representatives.

Section 1 – Overall Response

SASIG welcomes the Government's objective to improve clarity, predictability, and efficiency in the operation of the Air Navigation Directions (AND) and Air Navigation Guidance (ANG), particularly in the context of airspace modernisation and the integration of new airspace users.

However, SASIG is concerned that the proposed revisions risk **implicitly expanding the role and expectations placed on local authorities** in airspace change and UAS activity without clearly recognising and defining responsibilities, limits or resourcing. Greater clarity is required to ensure that statutory local authority functions are recognised appropriately and applied proportionately.

SASIG has a long-standing view, that has been expressed to DfT, CAA and ACOG that local authorities have been largely ignored in the whole airspace management and modernization process. Lip service has been played to our representations, but with very little acknowledgement of their responsibilities, other than land use planning, in various policy documents, procedural guidance statutory instruments and airspace masterplans.

We would also like to reinforce the need for environmental controls to be focused on noise below 4,000 ft to protect local communities in an expanding aviation market.

Section 2 – Detailed Responses Mapped to Draft AND / ANG

A. Government Priorities: Noise, Carbon and Environmental Objectives

Relevant draft sections:

- ANG – sections relating to environmental objectives and priorities in airspace design
- Consultation questions on clarification of environmental priorities

SASIG response:

SASIG supports clearer articulation of Government priorities regarding noise and carbon impacts in airspace design. Local authorities are frequently the **primary custodians of place-based environmental evidence** including noise complaints, local monitoring data, public health insights and planning context.

However, SASIG seeks clarification on:

- How the CAA will be directed to **formally consider and weight local authority empirical environmental evidence** alongside technical modelling by airports – whose presence is the cause of the noise and face no independent monitoring of their Noise Action Plans. Local Authorities need enforcement powers to ensure airports are meeting commitments in those plans.
- Whether such evidence will be treated as **material evidence** in decision-making, rather than contextual commentary.

SASIG considers it essential that the revised ANG explicitly recognises local authority environmental health functions as a **statutory input**, particularly where airspace changes affect residential amenity.

B. Engagement and the Role of Local Authorities

Relevant draft sections:

- ANG – stakeholder engagement principles
- Consultation questions on engagement quality and proportionality

SASIG response:

SASIG notes that the draft ANG increasingly positions local authorities as key actors in engagement processes, including as conduits to local communities. While this reflects the reality of local governance, the guidance does not clearly define the **nature or limits of this role**.

SASIG requests that the ANG explicitly distinguishes between local authorities acting as:

- Statutory consultees
- Democratic representatives of local communities

- Potential facilitators of engagement (where agreed and resourced)

The guidance should make clear that local authorities **are not responsible for delivering consultation on behalf of sponsors**, nor for validating sponsor-led engagement, unless this has been formally agreed and appropriately resourced.

Without such clarity, there is a risk of inconsistent expectations being placed on local authorities, particularly given current capacity constraints.

C. Transparency and Decision Justification

Relevant draft sections:

- ANG – transparency, reporting, and decision explanations

SASIG response:

SASIG supports stronger transparency requirements but recommends that the ANG explicitly require the CAA to:

- Summarise local authority representations received; and
- Explain how these representations were taken into account in reaching decisions.

This is critical to:

- Democratic accountability
- Enabling local authorities to explain outcomes to residents
- Maintaining public confidence in airspace decision-making

D. Call-In Process

Relevant draft sections:

- AND – call-in powers and procedural changes

SASIG response:

SASIG welcomes greater clarity and certainty around the call-in process but seeks confirmation that:

- Statutory local authorities will be **formally notified** where call-in is being considered or initiated.
- Local authority submissions to the CAA will automatically form part of the evidence base considered during call-in.

Local authorities should not be placed in a position where they must duplicate submissions or monitor escalation informally.

E. UAS Trials and Environmental Assessment

Relevant draft sections:

- AND / ANG – UAS trials and environmental assessment exemptions

SASIG response:

SASIG has significant objections regarding the proposal to remove formal environmental assessment requirements for certain UAS trials.

Local authorities are often the **first point of contact for residents** regarding noise, safety, and amenity impacts. SASIG therefore requests:

- A minimum notification requirement to affected local authorities for UAS trials.
- Clear thresholds for when engagement with local authorities is required.
- Explicit recognition of cumulative impacts where multiple trials occur in the same area.

The absence of formal assessment must not result in unmanaged impacts at local level.

SASIG Summary Position

SASIG urges DfT to ensure that the revised AND and ANG:

- Clearly define the statutory role of local authorities. They have the knowledge of their local domain and statutory legislative responsibilities which the CAA does not have: both should be accorded significant importance in the airspace modernisation process.
- Local authority officers and members, not the airport or CAA, will be the gateway for aggrieved householders and community groups and therefore they need to be heavily involved in the design and approval process. If not, then LAs will be justified in re-directing all such concerns and complaints to the CAA (or in the event of a call-in to the Secretary of State), as the decision-making body.
- There should be a clear hierarchy or flow programme for responsibilities, liabilities, resources, etc. between the various national and local governance structures.
- Avoid placing new implicit or unfunded responsibilities on councils.
- Strengthen transparency around how local authority evidence informs decisions.
- The CAA should also engage with LAs to enforce commitments made by airports in their Noise Action Plans; enable LAs to take on a monitoring role in this regard and reinforce the requirement for Noise Action Plans to be legally binding.

(Responses to the questions in the consultation document, where relevant are tied, to the numbered questions in Annex B of that document).

Q1. Do you agree with the proposed approach to clarifying government priorities for airspace design?

SASIG response:

SASIG broadly supports clearer articulation of government priorities such as noise and carbon but seeks more explicit direction on **how local authority environmental health data, planning evidence, and community feedback** will be weighted in CAA decision-making. The draft guidance does not currently articulate **how local authority roles intersect with environmental priorities**, which risks inconsistent use of place-based evidence in airspace decisions.

Q2. Are there additional considerations on priorities for airspace design?

SASIG response:

Yes. SASIG recommends that local contextual evidence (noise complaints, ambient monitoring, planning conditions) be included among formal inputs that CAA must explicitly consider when balancing priorities. Guidance should be clearer about evidence types accepted from local authorities and how those are factored into the CAA's judgement — not just high-level modelling.

Q3. Do you agree with the proposed changes to time limits on the call-in process?

SASIG response:

SASIG supports greater clarity on timelines but requests that the guidance include **formal notification and engagement pathways for local authorities** when call-in is being considered or enacted. Without this, councils may be excluded from key stages of escalation.

Q4. Are there other changes that should be made to the call-in process?

SASIG response:

Yes. SASIG suggests that the consultation and decision-making record include **clear justification of how local authority submissions were considered** during call-in decisions to aid democratic accountability. Local authority representations should also be sought from the Secretary of State to inform their decision-making, via a **minded to** letter seeking views.

Q5. Do you agree with the proposals on engagement and consultation?

SASIG response:

The emphasis on engagement is welcomed. However, the guidance would benefit from a **clear definition of the local authority's role** — distinguishing statutory consultee functions from optional facilitation roles — and how feedback should be interpreted.

Q6. Are there additional engagement expectations that should be included?

SASIG response:

Yes — minimum standards for notification to local authorities should be included when UAS trials or associated airspace change activities are proposed near populated areas. These included time periods that allow democratic decision-making, the cost of expertise required for LAs to assess such trials in relation to issues falling within their statutory jurisdiction (i.e. on the ground) and identify relevant local conditions. Only LAs can act as approving authority for drone-ports and vertiports and their strategic role in identifying suitable sites for such infrastructure in development and local transport plans needs to recognized as should their views on potential flight corridors and no flight zones from such sites.

Q7. Do you agree with the proposal to remove the need for environmental assessments for UAS trials?

SASIG response:

SASIG does **not support blanket removal** of environmental assessments for UAS trials near residential areas. At minimum, notification and engagement requirements should be included for local authorities and thresholds set based on the likely impact footprint.

Q8. Should exemptions from environmental assessments apply more broadly or be constrained?

SASIG response:

Exemptions should be **constrained** and tied to impact criteria. Removal of formal assessment should not preclude local authority oversight where trials affect noise, safety perceptions, or amenity.

Q9. Do you agree with the proposed changes to improve usability and clarity?

SASIG response:

Yes, subject to clarification that usability improvements also encompass **clear guides on local authority roles**, evidence types, and how community impacts are to be factored.

Q10. Are there additional overall changes that would improve the documents?

SASIG response:

Yes. SASIG recommends an annex or matrix that maps **CAA decision criteria to the roles and evidence expected from local authorities**, so that councils can prepare responses confidently and consistently.

Department for Transport

Webinar

Air Navigation Directions & Air Navigation Guidance

12 January 2026
10:00 – 11:30

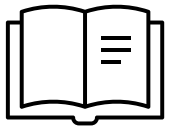
Housekeeping

- You will be muted with camera off during the webinar
- The webinar will run for up to approx. 90 minutes in total.
- Please use Slido for questions via www.slido.com and use the following participant code: 19880227– we will do our best to answer as many of these as we can in the time available
- We will post the Q&A on gov.uk, including answers to any questions we don't get around to covering today.
- If you have any trouble with technology, please email airspacemodernisation@dft.gov.uk

Agenda

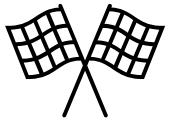
Housekeeping and aims for today

Opening Address



AND / ANG Proposed Changes

Questions



Closing remarks and finish

Aim for today

- The aim of this session is to help you understand what we are proposing so you can respond to the consultation.

- We will:
  - Run through the proposed changes to the Air Navigation Directions and Air Navigation Guidance;
  - Explain our thinking; and
  - Answer questions.

- Please do respond to the consultation

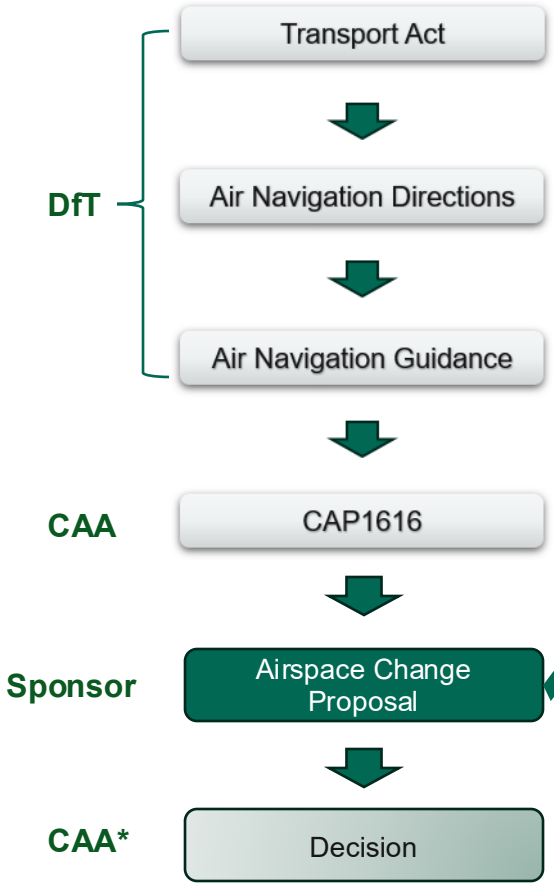
Opening Address

Department for Transport

AND & ANG Introduction

Department for Transport

Introduction - Airspace Regulatory Reform



Outlines Government policy and provides advice to the CAA on:

- Its environmental objectives when carrying out air navigation functions.
- Airspace and noise management

Specifically:
- SofS Call in Criteria
- Assessing impact of environmental factors

Sets out detailed airspace change process.

The ACP is developed by a sponsor. The airspace design may be affected by inputs such as criteria in the ANPS, planning conditions or local obligations or constraints.

If an ACP is approved, it can then be deployed. This is a complex process which includes updating systems and training controllers.

Department for Transport

* Decisions are taken by the CAA unless called in, when they would be taken by the SoS.

Why are we doing this?

- Airspace Modernisation has been a priority for successive governments because it can allow a national resource to be used more efficiently, reduce the environmental impacts of flights and improve the resilience of the sector.
- With the UKADS we are changing who delivers some airspace changes. But some responses to the UKADS consultation highlighted that current airspace processes can be confusing, burdensome and time-consuming.
- In particular, we have heard that the current framework does not give a clear enough position on how to balance noise, carbon, flight efficiency, and wider priorities.
- There can also be confusion over what is determined under different processes (eg planning decisions which set capacity and airspace design which enables it).
- Similarly, we have heard that it can be frustrating for those potentially affected by an airspace change who may feel that they are consulted too much, not enough, or simply cannot find the information they want.
- The CAA has been looking at its airspace change processes (CAP1616) and DfT has been looking at the Air Navigation Directions and Air Navigation Guidance. It makes sense to look at these at the same time.

The Consultation

Why are we consulting on changes to the AND & ANG?

- The ANG was last updated in 2017 – it needs to be updated to reflect changes to technologies and current Government policies and priorities.
- The changes aim to provide CAA and industry the tools to design, develop and implement a modernised airspace structure capable of delivery the capacity required in a sustainable manner.
- The changes will provide clear design priorities to enable UKADS to successfully design the complex London Airspace.
- It also aims to support potential changes to the CAA's Airspace Change processes (CAP1616) – this has been consulted on separately.

What are the objectives for this work?

- To help the Government deliver its climate obligations and ensure that airspace is fit for the 21st century.
- To set clear priorities for airspace design, with safety remaining the overarching priority.
- To provide greater clarity and flexibility, reducing barriers to implementing airspace change.
- To ensure that people potentially affected by an airspace change are engaged with honestly and effectively before designs are finalised or decisions taken.
- To strike the best balance between enabling capacity and mitigating environmental impacts, and between how different kinds of environmental impacts can be mitigated.

Five key areas of change

Strategic Prioritisation – Updates to reflect Government policies and priorities. Setting clear priorities for the airspace design through reaffirming safety as the overriding priority, how the airspace design must operate within the limits set by planning decisions and how noise and carbon impacts are to be effectively balanced.

Call-In – Reviewing the airspace change call-in process, including whether to implement new time limits on both the CAA and Government to process, review, consider and determine call-ins.

Consultation and Engagement – Review guidance on our expectations for how engagement with local communities is to be conducted, whilst striking the balance of autonomy and flexibility to ensure engagement is effective for regional / local circumstances.

New Users – Ensuring the Directions and Guidance are relevant and applicable to all types of airspace users. Enable temporary airspace structures and trials to effectively support industry and government development of UAS BVLOS operations and procedures.

Ambiguity – Addressing confusing terminology which is open to misunderstanding. Ensure government policy and intent is clear and understood.

Proposed Changes

Department for Transport

Strategic Prioritisation

We have heard that the current Guidance does not give sufficient clarity on priorities for airspace design.

- The current guidance prioritises reducing noise up to 4000 ft and reducing carbon above 7,000ft.
- In practice we have heard that this framework has caused confusion about how to balance noise impacts and carbon impacts and how this relates to other priorities.
- It can also lead to requirements to generate and model multiple options to mitigate noise impacts, even if they are not viable.

The Government proposes a new, clearer framework called the **Airspace Design Priorities**, which:

- Keep safety as the overriding priority.
- Clarify the relationship between airspace design and the planning process. Airspace design does set the number of flights which can take place- this is generally limited by the capacity of airports and the network. Airspace design should enable the capacity that has already been approved or applied for. So, where a planning decision sets a cap on the number of aircraft movements, the airspace design should enable that number of aircraft movements, as long as it is safe to do so.
- Where there is no cap on the number of aircraft movements, the airspace design should enable the safe maximum number of movements from the runway the relevant, having regard to demand.
- 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.

Strategic Prioritisation

The proposed **Airspace Design Priorities are**:

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.

This is probably the most significant proposal in the new ANG so we welcome views on both the overall approach and the specifics.
In particular, if you think that any part should be changed we would welcome evidence on what this would mean in terms of impacts and benefits.

Environment

Environmental Guidance

We are interested in feedback on how the airspace change process works with other processes such as the Habitats Regulations Assessment (HRA) and Strategic Environmental Assessment (SEA).

We are seeking evidence on the costs, benefits and practical impacts of current HRA/SEA requirements for ACPs.

The Government is exploring whether additional or clearer guidance could:

- Reduce duplication.
- Ensure the process is proportionate.
- Support consistent application across ACPs.

Noise Preferential Routes

Noise Preferential Routes (NPRs) are one tool which can help mitigate noise impacts. Most are set by local authorities or airports themselves but there are three which were set by Government several decades ago. We have had feedback that these are now outdated, difficult for aircraft to follow, and no longer deliver the noise outcomes they were designed for back in the 1970s.

The Government proposes to de-notify the Government-managed NPRs at the three designated airports, and strengthen the CAA's ability to require airports to publish track-keeping information, with the aim to:

- Ensure that NPRs dont constrain the best routes where fixed, legacy routes do not reflect modern navigation capabilities.
- Increase transparency by track-keeping information available to the public.

New Users

Airspace Trials and temporary changes to structures

Currently airspace trials have 6 month limits but it is common for trials to require longer to gather all necessary data and evidence.
Similarly, the limit on temporary changes to structures of 90 days provides little flexibility for operators in the event of weather delays, and increases the need for regulatory compliance and therefore cost.

We are proposing to:

- Allow the CAA to routinely approve airspace trials for up to 3 years.
- Extend the permitted duration of temporary airspace structures to 180 days.

With the aim to:

- Reduce administrative burden on operators and the CAA from multiple submissions.
- Ensure they run long enough to gather robust data, for drones, and other technologies.
- Increase operational flexibility.

Environmental assessments for UAS BVLOS airspace users

The ANG is designed around conventional aircraft. As a result, operators must currently undertake full environmental assessments even though they are not completely applicable.

We are proposing to guide the CAA that it does not need to consider environmental impacts when assessing:

- BVLOS airspace trials undertaken to support policy development.
- Temporary airspace changes intended to enable new users and support Government policy.

With the aim to:

- Reduce costly and time-consuming assessments which are not appropriate.
- Reduce risk of delaying the implementation of the trials.

Engagement

Call-in

Any individual may request that the Secretary of State "call in" a CAA airspace change decision.

We are proposing to retain the call-in process but:

- Simplify the criteria so that only ACPs of strategic national importance are eligible.
- Introduce a 3-month time limit (extendable by 3 months) for deciding whether to call in an ACP.

With the aim to:

- Preserve the call-in only for the most nationally significant changes.
- Make the process faster, and more streamlined.
- Reduce programme delays, costs for sponsors, and uncertainty for communities.

Consultation

Current guidance provides flexibility to scale engagement and sponsors can propose the methods they consider the most effective and suitable for those potentially affected by an airspace change.

We are proposing to consider giving local authorities or industry bodies a more explicit role as consultation conduits.

With the aim to:

- Improve awareness, accessibility, and local relevance of consultations.
- Support sponsors in delivering effective, proportionate engagement.
- Ensure communities understand the process and can provide meaningful input.

Ambiguity

General Review and Improvements

- Feedback has indicated that the current Directions and Guidance can be ambiguous and in some places is not as clear as it could be. An example of this is how the guidance is applicable for and under what circumstances.

- We have carried out a general review of the documents with the aim of making them clear and concise. We would welcome feedback on whether we have achieved this.

- We've also ensured that the document references the latest in Government policy, including references to current legislation, policies and procedures.

- We are also seeking views on whether anything else should be included in the guidance.

Transition to the new framework

We are keen to gather evidence and views on the transition to the new process and what the Government should consider.

In particular, we want to avoid sponsors needing to redo significant work from an earlier stage.

We are proposing that:

- Any new ACP that starts after the final revised ANG is published should follow the ANG 2026.
- Any ACP being sponsored by the UKADS should follow the ANG 2026.
- Where an ACP is already underway
  - —If it has completed the Stage 2 gateway under CAP1616, it should continue applying the guidance set out in ANG 2017.
  - —Otherwise ACPs should apply the ANG 2026.

We are keen to get views on how the transition should work for ACPs that are already underway, including if there are other issues in relation to the transition to the new process that the Government should consider.

Questions

Please ask questions using Slido via the QR code or visit www.slido.com and use the following participant code: 19880227

Next Steps & Closing Remarks

Timeline of Work

November 2025

Consultation Launch

End January 2026

Consultation Closes

Q1 2026

Analysis of responses, further work and development of final proposals

Q2 2026

Publication of Consultation Response Document and Updated ANG and AND
Published on Gov.UK

Q2 2026

Implementation – Revised Air Navigation Directions and Air Navigation Guidance in force.

Department for Transport

Thank you

Consultation: [Changes to the air navigation directions and air navigation guidance - GOV.UK]

e mail: airspacemodernisation@dft.gov.uk

Closing date: 11:59pm on 20 January 2026

12th January 2026 Webinar – Q&A Document

This document sets out questions that were asked during the webinar on the consultation about Changes to the air navigation directions and air navigation guidance - GOV.UK held on 12 January 2026. We have included all questions that were asked but where similar questions were asked in some cases we have aggregated these to provide a single answer.

The answers below aim to set out the thinking which has informed the consultation on the draft Air Navigation Guidance (ANG) and Air Navigation Directions (AND) to help understanding of the proposals and help people respond to the consultation. We have grouped questions by subject rather than the order in which they were asked.

The final versions of the ANG and AND, and the policies it reflects, will be developed in consideration to the feedback from the consultation so none of the answers below should be read as prejudging the outcome of the consultation.

Noise & Environmental Impacts

- **What is the thinking between avoiding newly overflown settlements rather than sharing noise disbenefits more widely?**

The overarching aim is to minimise the number of people affected by the airspace change. From a noise perspective, a single route typically results in fewer people being affected overall. Dispersing aircraft across multiple routes can reduce average noise exposure levels but may affect a larger number of residents. There are costs and benefits to both approaches. The draft ANG proposes that there should be flexibility for choices to be made on a case-specific basis guided by local conditions and the best design option for the operational needs of the airport.

- **How will you ensure meaningful respite with performance-based navigation (PBN) flight paths?**

Performance-Based Navigation (PBN) technology means that aircraft can fly more accurately and predictably on flight paths. This relates to both the vertical and lateral positions of aircraft. Any changes to flight paths would only take place as a result of an Airspace Change Process so would to be consulted on before they are implemented through the CAA's CAP1616 process. By enabling more accurate flightpaths, this can support the delivery of respite this could include, for example, delivering a requirement for respite from a planning condition.

- **How are the results of ANAS (Latest UK noise annoyance survey) going to be integrated into setting environmental levels? Should be published in 2026.**

When developing the proposals, we have considered the latest information and policies. If it is ready the ANAS study would be considered alongside consultation responses in arriving at final decisions.

- **Is the proposal to analyse noise above 4,000ft and share information, or not (irrespective of new priorities)?**

This is still to be determined and is explained in more detail under the heading **Decision Making Efficiency within the section** of the draft Air navigation guidance: proposed 2026 version called **Strategic Direction and Prioritisation**. There could be a requirement for noise to be assessed beyond 4,000ft for a final design even if the design priority moves from minimising noise to prioritising flight efficiency (minimising fuel burn which would have the effect of minimising carbon) at 4,000ft, based on evidence on the effects of noise in these areas.

- **Can you explain analytical reasoning for 4,000ft?**

4000ft is likely to be the lowest altitude at which a change to the priority between minimising noise and prioritising flight efficiency (minimising fuel burn) could be considered. This is because above 4000ft aircraft will be "vectored" or instructed to fly the safest quickest route up to the "airways" in en-route airspace having regard to the surrounding aviation traffic in the vicinity at the time. Given the four dimensional (horizontal. vertical and time) nature of airspace the process for designing and assessing flightpaths around minimising noise impacts becomes considerably more complex from 4000ft and above, as there may be many more potential options for where flightpaths might be considered even if they are not ultimately operable (eg because of a potential route clashes with a flight path from another airport, or in attempting to minimise noise for one area causes more people to be affected in another. The potential outcome of this is that considerably more time and effort is expended, without actually producing a meaningfully different outcome for people affected by aircraft noise on the ground.

Annex A of the Options Assessment: air navigation directions and air navigation guidance sets out more information on the potential implications of this change.

- **Can you expand upon the analysis of there being no real change in London?**

There will be changes to airspace for London. The key factor determining the location of a flightpath is the location of the runway which is fixed. London and the Southeast of England has some of the busiest airspace in the world so many people are already likely to be under or close to a flight path.

Our proposed guidance ensures that a fundamental part of the CAA's Airspace Change Process is, and will continue to be, that people who are potentially affected by an airspace change are able to understand the proposed change and are consulted before any final decisions are made.

- **How have Transport Analysis Guidance (TAG) valuations been used to prioritise capacity, and used to deprioritise noise above 4,000ft.**

The Department's Transport Analysis Guidance (TAG) is used to assess noise impacts. Any robust new evidence or valuations would ultimately be factored into the Department's TAG appraisal tool, whose use is a requirement under CAP 1616 for ACP sponsors to follow.
We haven't used TAG valuations in this case because TAG is used to assess specific airspace proposals.

- **Is there evidence to show that social value/value for money will improve as a result of these changes?**

Further information is set out in the Options Appraisal published alongside the consultation.

Airspace modernisation aims to benefit passengers by providing more choice and value for the consumer and shippers, while enhancing the likelihood that services can run to schedule. By optimising flight paths, the modernisation of airspace will deliver a reduction in delays enabling passengers to experience quicker journey times and greater reliability, boosting customer satisfaction. Passengers may be less likely to have to rearrange plans due to flight cancellations and diversions at short notice, as airspace modernisation can enable airlines to be more dynamic and flexible during inclement weather.

Furthermore, increased airspace efficiency can help to address congestion 'hotspots' and reduce the need for holding stacks, where aircraft join circular queues to land at busy airports. Modernised airspace also makes it feasible to deliver the high safety standards that passengers require. For example, as traffic grows, some of the innovative solutions that may be needed to maintain safety levels include new designs of route separation and new technologies that automate controller tasks.

- **Are there health and/or annoyance impacts for noise levels experienced between 4,000ft and 7,000ft?**

People will be able to hear aircraft between 4000ft and 7000ft, just as they can today. Further information is available on this, for example in the CAA's CAP1498 or the Overarching aviation noise policy - GOV.UK. It should be noted that the extent of noise contours is not necessarily altitude dependent. We are asking for evidence of impacts under the current prioritisation in the consultation.

- **The draft Air Navigation Guidance states in priority that implementing activity is prior to noise reduction below 4,000ft. How does this work for communities?**

That is not quite right- capacity (ie the number of flights) and minimising noise are not mutually exclusive. Under the Airspace Design Priorities, the overarching priority is that the design of airspace must be **safe**. As long as it is safe, the airspace should be designed to facilitate the number of flights permitted by existing airport infrastructure and any that is being planned. This effectively sets the number of flights that the airspace should be designed to accommodate. Within this, the next priority is that the airspace is designed to minimise change to the areas where aircraft noise is currently experienced from aircraft below 4,000 ft, and then minimising adverse noise impacts below 4000 ft. This is one of the areas that we are seeking views on.

However, regardless of this change, Airspace Modernisation should have a positive impact on noise. For example, by enabling steeper climbs and descents mean that aircraft will spend less time at lower altitudes.

- **Why has the Noise Objective in Air Navigation Guidance 2017 cl 1.2 been dropped?**

In relation to noise, the ANG 2017 1.2 sets out the Government aims to *limit and, where possible, reduce the number of people in the UK significantly affected by adverse impacts from aircraft noise*. The ANG 2026 outlines the Government's key environmental objective to

minimise the adverse noise impact on the ground from individual flights by maximising flight efficiency in the Strategic Prioritisation section.

- **Flight Efficiency needs fully definition (Glossary). E.G. Is Carbon efficiency from 4kft to final destination or say to 7kft or enroute height.**

Thank you for this feedback- we will consider this point as part of our analysis of consultation responses. If you have not already responded please do include this in your response. In the proposed ANG flight efficiency means the minimum fuel burn per flight – further detail is in the draft ANG under the heading **Flight Efficiency Assessments** in the sections titled **Guidance on how to assess an airspace design against the Airspace Design Priorities**

- **Isn't introducing "Airspace Design Priorities" legally flawed / ultra vires since it widens the guidance scope (beyond the environment) without amending 70(d)**

We do not believe that any of the proposed guidance widens the scope of the guidance beyond what is envisaged by the Transport Act 2000.

The proposals are subject to consultation. Under provisions within the Transport Act 2000, the Secretary of State for Transport can give directions to the CAA in relation to its air navigation functions. These are the AND 2023 which include directions relating to airspace design. The Transport Act 2000 sets out the CAA's duties when carrying out these functions, including taking account of any guidance on environmental objectives given to the CAA by the Secretary of State.

<u>NPRs (Noise Preferential Routes)</u>

- **On Noise Preferential Routes (NPRs), can you build out how the new track keeping regime would work? Powers of Civil Aviation Authority (CAA), requirements on airports. Could be a huge burden and cause misunderstand.**

Through the AND we are proposing to require the CAA to guide airports to publish track keeping information. Many airports already publish this information to ensure transparency for their local communities so we do not believe that should cause a significant new burden. However, if you believe that this is not the case we would welcome further information on why and how through the consultation

- **Please explain your statement comment that Noise Preferential Routes (NPRs) are set by Local Authorities - are you saying that this is in Town Planning approvals**

The Government has designated Heathrow, Gatwick and Stansted for noise control purposes since 1971, under s.80 of the Civil Aviation Act 1982. The Secretary of State's powers regarding noise control at these airports are set out in sections 78-79 of that Act. Controls set at the designated airports are similar to those in place at many other airports which include NPRs. Over the years a number of other airports have established NPRs. Some of these were set voluntarily by the airport, whilst others were created following local planning (Section 106)

agreements with local authorities, as has been undertaken, for example, at Luton and Manchester airports.

- **Is there any research on what the effects of abolishing Noise Preferential Routes (NPRs) will be upon communities and if so what?**

There would be no immediate impact of removing the NPRs at the three designated airports. Any change to flight paths would only occur through an Airspace Change proposal, which would still need to be consulted on under the CAA's airspace change process (CAP1616).

This change has been proposed because NPRs in effect limit or don't align with airspace changes. When the NPRs were designed there was not the same transparent and publicly accountable ACP process which there is today, into which the public could have their say.

- **Which are the 3 government set Noise Preferential Routes (NPRs)?**

The three sets of noise preferential routes are Gatwick, Heathrow and Stansted Airports where the government set NPRs. Details of the Heathrow NPRs are at Departure flight paths | Heathrow; Gatwick NRs are at Airspace_Departures_2024_v6.pdf; and Stansted NPRs are at 7332-noise-factsheets-a4-departures.pdf

Heathrow / Third Runway

- **Given that impacts from the 3rd runway won't be known until airspace has been designed, how can those affected be consulted before decisions are finalised**
- **The most strategic change is interaction between airspace modernisation and Heathrow 3rd runway. Can the Department of Transport integrate these decisions to ensure their legitimacy?**
- **Will the CAA will have to wait until that Development Consent Order (DCO) Pre-Application stage is completed and 'Accepted' by the Planning Inspectorate (PINS), before the UKA Airspace Design Service (UKADS) addresses Heathrow's airspace change proposal (ACP) in their London Terminal Manoeuvring Area (LTMA)?**
- **Will the Air Navigation Guidance 2026 apply to Heathrow's sub-4,000ft flight paths (by UKADS)? And will this be different if UKADS has to revisit CAP1616 Stage 1 for a 3-runway Heathrow?**

We have proposed that the UK Airspace Design Service (UKADS) will sponsor the design for London airspace, including responsibility for consulting on the proposed changes as required by CAP1616. This would include airspace needed for a third runway.

Airspace Change is a separate process from any planning process. As set out in the draft proposed ANG, policies and decisions about the construction and operation of airports and aerodromes would be made by the planning process, not through the airspace change process. The aim of the airspace change process is to deliver airspace improvements to enable the capacity or other limits set by any planning decision. It is expected that the airspace change process would work in parallel with any application for Development Consent for a third runway at Heathrow. People who might be affected would be able to engage through both processes.

We have proposed that any airspace change proposal being sponsored by the UKADS should be based on the ANG 2026. The CAA has consulted separately on potential changes to CAP1616 and has proposed that any terms and date of coming into force will be influenced by the terms and date of coming into force of any revised AND and ANG.

The existing Airports National Policy Statement (ANPS) sets out a range of measures that could be used to address noise impacts, including runway alternation that provides communities with predictable respite periods, and an expected ban on scheduled night flights of 6.5 hours. The ANPS is currently being reviewed and any amendments to it will be consulted on.

Airspace Change proposals at Heathrow Airport will need to take into account the mitigation measures required by the ANPS.

- **Interesting point about assuming that planning permission will be given. Is this a way to deal with the uncertainty around a 3rd runway at Heathrow?**

Detailed plans for Heathrow expansion would be considered and evaluated through the DCO planning process. A final decision on the scheme can only be made following the conclusion of this process.

Although we can't prejudge the outcome of the review of the ANPS, any revised ANPS can be expected to set out requirements on aviation noise that must be met by a scheme for a Northwest Runway regardless of the Airspace Modernisation process, providing some certainty for the most affected communities.

In order to progress the Airspace Change for London certain assumptions will need to be made, which may need to be updated in the light of the outcome of any planning process.

<u>Planning</u>

- **How will the environment be protected during airspace changes without a planning decision?**

Guidance on how the CAA should apply the Secretary of State's environmental objectives for the CAA when carrying out its airspace functions (including making decisions on airspace change) is set out in the Airspace Design Priorities (and the overarching principles for airspace design) in the draft proposed ANG. This guidance would apply whether or not there is a current on-going planning application or process.

- **Please clarify the position if sponsored by UKADS (apply 2026) and completed Stage 2 (apply ANG 2017)?**

The proposals aim to balance the benefits of the new guidance against the costs of requiring airspace change sponsors and their stakeholders to redo any work they have already done under ANG 2017 and the CAA's associated CAP 1616.

We have proposed that the new guidance (ie the ANG2026) would apply to any airspace change sponsored by UKADS.

The proposed new guidance would also apply to any airspace change proposal that has not yet published its public consultation.

It would not apply to any airspace change proposal that has commenced its public consultation. However, we have proposed that, as a backstop, the proposed new guidance would apply to those proposals if the proposal has not been submitted to the CAA for decision by the end of July 2027.

We recognise that how this migration takes place could have an impact on ACPs which are underway so we would welcome views on this.

New Users

- **What environmental assessments would new users have to undertake?**

The Airspace Design Priorities set out in the proposed guidance are the same for established aviation and new users. However, as set out in the proposed guidance the Government recognises that an evidence base is needed to enable policy to be developed to support the objective that new users are enabled in order to promote economic growth whilst taking into account its impacts on all stakeholders.

For this reason the Government wishes to support and encourage trials that will enable such an evidence base to be generated. The current policy was developed with the characteristics of established aviation and not new users in mind. For this reason we are proposing to guide the CAA to disregard the environmental impact for the purpose of specific UAS airspace (time-limited) trials only. The guidance proposes that, in these specific circumstances, no environmental assessment would be necessary.

- **How will DfT govern CAA discretion?**

As the UK's independent aviation regulator, the CAA is empowered to apply the guidance. Like other aspects of the ANG, DfT does not routinely govern how it is applied. However, there are formal governance arrangements in place between DfT and CAA to monitor performance of the airspace modernisation programme more holistically.

Call In Process

- **Will the new single criterion be more precisely defined?**

Yes, the new criteria for what is defined as 'strategic national importance' will be developed following consultation and will consider any feedback received. The criteria won't be captured within the revised ANG document as it is subject to separate guidance issued by the DfT to the CAA.

UKADS / CAA / Consultation

- **Why does guidance suggest airports lead engagement rather than UK Airspace Design Service (UKADS), how will interactions over London airspace be consulted upon?**

As the UKADS provider, NERL will have overall accountability for the consultation for any airspace change proposal it sponsors, which will follow the requirements set out by CAP1616 (subject to any changes following the CAA's recent consultation on the process). However, NERL will work collaboratively with each of its airport partners to deliver specific engagement activities, according to the approach agreed in their bespoke onboarding arrangement, to make the best use of airports' local knowledge and established relationships with their communities.

- **What provisions are in place for military airspace change sponsors? Any changes to current process?**

We are not proposing any changes to our guidance to the CAA on airspace change proposals sponsored by the Military. The position would remain as set out in the current guidance.

- **On engagement / consultation changes, does the specific mention of local authorities, mean others will lose their ability to engage directly?**

No – we are considering amending the ANG to encourage sponsors, where appropriate, to consider using local authorities as conduits if it is beneficial for their engagement based on local circumstances.

- **Have local authorities been consulted on their potential involvement in handling consultations?**

We would welcome feedback from local authorities on the proposals.

- **What do you have in mind for alternative bodies and what will their role be?**
- **On consultation, unclear what you have in mind re alternative bodies — who, what, resourcing?**

The guidance aims to encourage airspace change sponsors to consider all viable means of reaching their stakeholders, which could include greater use of local councils and authorities. The airspace change sponsor would remain responsible for engagement and so it would be up to the individual sponsor on how they wish to use the resources available them, based on what would lead to be best consultation.

- **Why on consultation on environmental guidance do you only ask the views of preparers (costs). Are you open to receive the views of others (the benefits)?**

We welcome feedback from everyone.

Costs

Will there be a cap on increases to the airspace design charge (ADC) to avoid cost spike for airlines in NR28 (price control period for NERL)? What will prevent the £31.6m cost for 2026-2027 from escalating in NR28?

The Airspace Design Charge will be managed as part of the CAA's economic regulation processes. This is covered in more detail in 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