



Department
for Transport

Air Navigation Directions and Air Navigation Guidance

Consultation Response Document

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1. Executive Summary

This document sets out the government's response to the public consultation¹ on proposed updates to the Air Navigation Directions (AND) and Air Navigation Guidance (ANG), which together establish the framework for airspace change in the UK.

Modernising the UK's airspace is a critical national priority. If UK airspace is not modernised, by 2040, flight delays could rise by more than 200%, with around one in five flights facing disruptions of over 45 minutes². Beyond strengthening resilience and increasing capacity, airspace modernisation will also help unlock new transport modes and support economic growth by enabling a wider range of airspace users to operate at scale. It also provides an immediate opportunity to cut aviation-related greenhouse gas emissions. By enabling more efficient routing - such as allowing aircraft to fly more direct paths and make continuous climbs and descents - we can reduce fuel burn per flight and improve environmental performance.

The consultation sought views on updates designed to accelerate delivery of modernisation and better align the regulatory framework with the objectives of the UK's Airspace Modernisation Strategy (AMS). While significant progress has been made, there are concerns about the pace of implementation. In response, the government is taking steps to streamline processes, reduce unnecessary complexity, and provide greater certainty to industry. The Civil Aviation Authority (CAA) has also been looking at its detailed guidance on airspace change proposals, known as CAP1616.

The government received 264 responses from a wide range of stakeholders, including industry, community groups, and members of the public. While there was broad support for updating the AND and ANG, views diverged on how best to balance competing priorities, particularly noise impacts and greenhouse gas emissions. Aircraft noise emerged as the dominant issue for many respondents, with strong calls to ensure that community impacts remain central to airspace design decisions.

We remain committed to delivering a modern, efficient, and environmentally sustainable UK airspace system while maintaining the highest standards of safety. We also recognise the importance of maintaining public trust and confidence given the local community

¹ <https://www.gov.uk/government/consultations/changes-to-the-air-navigation-directions-and-air-navigation-guidance>

² <https://hansard.parliament.uk/commons/E2%80%8F/2024-10-22/debates/24102240000019/UKAirspaceDesignServiceConsultation>

impacts of the proposed reforms. After detailed consideration of the feedback received, the government will proceed with the following reforms:

Transitional arrangements - A structured approach will be implemented to manage the transition to the updated ANG, allowing well-advanced Airspace Change Proposals (ACPs) to continue under existing guidance where appropriate, while ensuring that new and early-stage proposals adopt the revised framework.

Introduction of Airspace Design Priorities - The government will replace the existing altitude-based framework with the Airspace Design Priorities, to provide clearer direction on trade-offs between noise, greenhouse gas emissions, and operational efficiency. Following consultation feedback, the threshold for prioritising noise has been increased from 4,000ft to 5,000ft, with flight efficiency prioritised above this level.

Airspace trials and temporary airspace changes - The government will make it more straightforward to apply for longer duration airspace trials and temporary changes to airspace, alongside a more proportionate approach to environmental assessments for certain innovative operations. Safeguards will be maintained to ensure appropriate oversight and community protection.

Call-in of airspace changes - The Secretary of State will retain the ability to call-in airspace change decisions where they are of strategic national importance. The criteria and process will be clarified and streamlined, including the introduction of defined time limits to reduce uncertainty.

Approach to non-airspace environmental assessment requirements - The government will explore opportunities to provide clearer guidance on the application of non-aviation environmental assessment requirements to airspace changes, with a view to ensuring a more proportionate and consistent approach.

Noise Preferential Routes (NPRs) - The government will de-notify NPRs at the three designated airports (Heathrow, Gatwick and Stansted), recognising that they are outdated and not aligned with modern navigation capabilities. This will not lead to any immediate change to airspace use around these airports, but it will enable noise and other factors to be properly considered in accordance with the Airspace Design Priorities when their airspace is redesigned. This measure is accompanied by strengthened guidance for transparent publication of track-keeping data to maintain accountability and community visibility.

Consultation requirements - The government will retain a strong emphasis on inclusive, meaningful consultation as a core part of the airspace change process. Proposals to allow third-party organisations to act as consultation conduits will not be taken forward, and additional efforts will be made to improve the clarity and accessibility of consultation materials.

The updated AND and ANG establish a more robust, coherent, and future-focused framework for UK airspace management. They provide the clarity and impetus needed to deliver airspace modernisation at pace while balancing economic growth, environmental sustainability, and community interests. The government will continue to work closely with the CAA, industry stakeholders, and community groups to ensure successful implementation and to realise the full benefits of a modernised UK airspace system.

2. Introduction

Modernising UK airspace is essential to improving system resilience, reducing delays, and enabling more efficient aircraft operations. It also supports the government's broader objectives to reduce aviation emissions and manage environmental impacts, particularly aircraft noise.

In November 2025, the government consulted on proposed updates to the AND and ANG. Together, these set the framework for airspace changes in the UK, informing the CAA's CAP1616 airspace change process.

The AND and ANG were last updated in 2023 and 2017 respectively. While the aims of the 2017 ANG remain valid, its practical application has proved more challenging. Since then, the aviation sector has also changed significantly, with new technologies and new types of airspace users not envisaged in the earlier guidance. External factors such as the COVID-19 pandemic have affected delivery, and feedback from airports, airlines and others indicates that the current processes are often confusing, costly and time-consuming. Community groups and individuals have also said that Airspace Change Proposals (ACPs) can be difficult to understand, with consultation material either overwhelming in volume and technical detail or insufficiently clear.

To address these issues, the DfT proposed revisions to the AND and ANG to make them clearer, more usable, and better aligned with government policy on airspace modernisation. Safety remains the overriding priority, and the consultation sought views on proposals to create a clearer and more proportionate framework, including the introduction of Airspace Design Priorities, updated environmental assessment requirements, and changes to governance and process arrangements.

The consultation

The consultation ran from 25 November 2025 to 26 January 2026 and received 264 responses. These came from individual members of the public (79%), community groups (8%), campaign groups (4%), and aviation industry stakeholders (9%), including airports and national bodies such as the CAA and NATS. Around half of public responses (140) used a campaign group template; these are counted in the totals but have been considered together for analysis.

This document sets out the government's response. It summarises the main themes raised, explains the government's position on the issues consulted on, and outlines how

feedback has informed the final policy. It focuses on key issues rather than individually addressing every individual point.

In preparing this response, the government also considered wider evidence, including the Aviation Noise Attitudes Survey (ANAS) and Part 1 of the Aircraft Night Noise Effects (ANNE) reports published on 10 June.

3. General comments including overall approach to airspace modernisation

The consultation set out the government's policy objectives for UK airspace design, which will guide how the CAA carries out its air navigation functions. Central to this is providing clear priorities on how overall capacity, noise impacts, and greenhouse gas emissions should be balanced. The consultation also proposed:

- **Updated environmental guidance** - clearer direction on how environmental obligations should be applied in the airspace change process.
- **Clearer expectations for engagement** - improved clarity on consultation requirements between ACP sponsors and affected communities.
- **Revised call-in process** - updates to when ACPs may be determined by the Secretary of State.
- **Environmental assessment policy for Uncrewed Aircraft Systems and Beyond Visual Line of Sight (BVLOS) operations** - requirements for airspace decisions enabling uncrewed aircraft operations.

Many respondents raised concerns about potential increases in flight numbers, including those linked to new ground infrastructure such as runways. However, increased flight numbers are not, in themselves, a direct result of airspace modernisation. Airport capacity and operating limits, which are set through the planning system, determine flight numbers. Modernisation provides the airspace structure needed to safely accommodate whatever capacity planning decisions allow.

Noise was a major theme across responses. Modernised airspace should be quieter and cleaner than unmodernised airspace, using improved technology and new airspace structures to reduce impacts. While lateral flight path changes are the most visible element, better air traffic management can also enable continuous climbs and descents, which significantly reduce noise. New aircraft technologies and quieter engines remain the most effective long term means of reducing noise for communities.

The consultation attracted a wide range of respondents, including industry bodies, airports, airlines, air navigation service providers, local authorities, community groups and

individuals. Most supported updating and clarifying the ANG, noting confusion with the current version.

Feedback to the consultation reinforced the urgency of modernisation but highlighted concerns about the pace and complexity of current processes, as well as the need to maintain public confidence through transparent and meaningful engagement. Individuals, community groups and campaign groups primarily raised concerns about aircraft noise and argued that government policy should give greater priority to minimising noise impacts.

4. Aircraft noise

Many consultation responses raised concerns about aircraft noise, both its current impact on individuals and communities and the potential effects of future airspace changes. Respondents also questioned the altitude up to which noise should be prioritised in airspace design. Individuals, community groups and campaign groups commonly argued that minimising and mitigating noise should receive greater priority than reducing carbon or other greenhouse gas emissions.

The government is making several changes to the ANG in response to this feedback, outlined later in this document. In developing its position, the government has also considered the findings of ANAS³ and ANNE Part 1⁴ reports, published on 10 June.

The government's objectives in relation to noise

The government's overarching policy objective remains to limit and, where possible, reduce the total adverse effects on health and quality of life from aviation noise⁵. Airspace decisions that influence how noise is distributed should follow the ANG and apply the guidance to local circumstances.

Airspace modernisation should reduce the level of aircraft noise for most people compared to what it would be if the airspace was not modernised. However, there are limits to what airspace design alone can achieve. Other factors have a greater influence on noise experienced on the ground, including:

- Runway location - The ends of runways are fixed, and this affects where aircraft take off and land from - and therefore some of the activities which generate the most noise such as engine power, reverse thrust, deployment of flaps, and landing gear.
- Prevailing winds - Aircraft generally take off and land according to the direction of the prevailing winds which affects which areas are overflowed.
- The number of flights - While aircraft have been getting quieter and cleaner, the number of flights has continued to grow. In the 1950s there were around 200,000

³ <https://www.caa.co.uk/data-and-publications/publications/documents/content/cap3131>

⁴ <https://www.gov.uk/government/publications/aviation-night-noise-effects-anne-study>

⁵ From the 2023 [Aviation noise policy statement - GOV.UK](#)

flights per year in UK airspace, compared with over 2.1m flights in 2019. Although the number of flights dropped significantly during the COVID-19 pandemic, by 2025 numbers of flights had almost recovered to pre-pandemic levels.

- Aircraft technology - Modern aircraft and engines are generally much quieter than their predecessors. Following the COVID-19 pandemic, many airlines have updated their fleets and there has been a shift from older, noisier (and more expensive to operate) four-engined aircraft to newer twin engined aircraft. The map below shows the areas exposed to average continuous aircraft noise of 57 decibels between 07:00-23:00 for a 3-month summer period. The contours have shrunk over time due to use of quieter aircraft.
- Regional population density - London and the South-East have a higher concentration of population, airports and flights and therefore there is more noise exposure than in other parts of the UK.
- Continuous climb - This may increase noise for the small number of people who are very close to the end of a runway, especially when the aircraft is using maximum engine power. However, it should minimise noise overall, reducing noisier elements of the flight (e.g. sudden changes in engine power as aircraft level off and then climb again) and may minimise time at low altitudes, particularly reducing noise for people who are further from the airport. In addition, the quicker an aircraft can climb to its cruising altitude, generally the lower its noise impact on the ground will be.
- Performance Based Navigation (PBN) - This allows for more precise and predictable routes, which can be designed away from population centres. However, because it allows more precise navigation, PBN reduces the natural dispersion of tracks, so those directly under more precise flightpaths may experience more frequent overflights and noise.

The relationship between airspace and noise

Modernised airspace can reduce overall aircraft noise compared with unmodernised airspace, using measures such as:

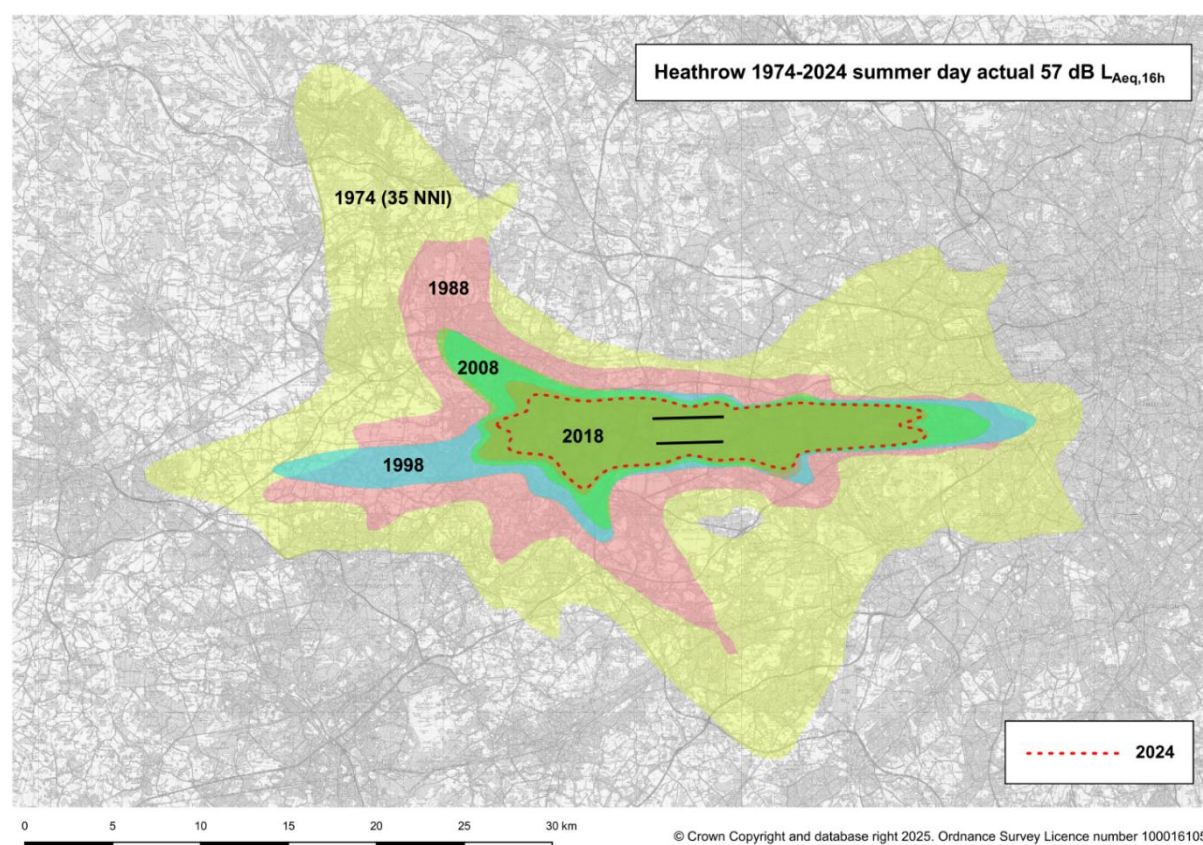
- Smoother climbs and descents - reducing the need for high thrust or stepped altitude changes.
- More accurate navigation - enabling routes that avoid densely populated areas, offer noise respite options, and provide more consistent climb and descent profiles.

The benefits for individuals vary depending on factors such as time of day and ambient noise levels; for example, an aircraft is more noticeable in a quiet rural area at night than in a busy city during the day.

Airspace is three dimensional and the design of a flightpath may also need to take account of other routes that could be above or below it. This is particularly the case where there are multiple airports fairly close to each other.

Analysis by the Sustainable Aviation Coalition⁶ states that 'UK aviation noise output is forecast to reduce by 35% in 2035 compared to 2019, despite a rise in Air Traffic Movements (ATMs)'. While actual noise exposure at individual UK airports will vary locally depending on a range of factors, the introduction of new aircraft has demonstrated up to 50% noise reduction compared to the 'Legacy' aircraft they are now replacing. The latest CAA Aviation Environmental Review⁷ published in December 2025, states that while air traffic has not quite regained pre-pandemic 2019 levels (94%), the noise generated by a daytime flight in 2024 exposed fewer people compared to 2019.

The map below shows how noise contours around Heathrow have shrunk around since 1974.



The relationship between airspace and greenhouse gas emissions

Aircraft produce emissions, including carbon dioxide, which has a negative impact on the environment. Reducing these emissions is a key government priority and airspace modernisation is one of the tools that can help achieve this as set out in the Jet Zero Strategy. Airspace modernisation can help reduce emissions per flight through better use of airspace. This can include:

- More direct flightpaths - if an aircraft can fly a shorter and more direct route it will burn less fuel and produce fewer emissions. Airspace changes introduced to date have demonstrated this benefit. For example, the UK's first Free Route Airspace

⁶ <https://www.sustainableaviation.co.uk/news/sustainable-aviation-technology-is-reducing-industrys-noise-impact-even-as-sector-grows/>

⁷ <https://www.caa.co.uk/publication/download/26520>

deployment⁸ was implemented in December 2021 and covered around a third of the country's airspace, a total of some 150,000nm². This change has enabled savings of up to 12,000 tonnes of CO₂ annually.

- Smoother climbs and descents - these can reduce fuel burn and aviation emissions by allowing aircraft to operate more efficiently, minimising the need for high-thrust, fuel-intensive, stepped, or level-flight segments. Studies carried out by Eurocontrol in 2017 have found that these procedures can cut fuel consumption by an average of 139 kg per flight, substantially lowering greenhouse gas emissions.
- Greater resilience - airspace modernisation will help make flights more reliable, reducing the time that aircraft spend in holding patterns and therefore the fuel used and the emissions generated.

The government's approach to balancing key priorities

The government recognises the significant importance of aircraft noise to affected communities and has taken account of emerging evidence, including findings from the ANAS and the ANNE Part 1 studies which show greater public sensitivity to aircraft noise than previously.

The updated framework seeks to balance environmental objectives by reducing emissions per flight through more efficient airspace design while maintaining a strong focus on minimising adverse impacts on communities.

The needs of airports and their local communities differ across the country, as do the available design options. Meaningful consultation, transparent analysis, and clear communication of impacts will remain essential requirements under the CAP1616 airspace change process.

In some cases, an airspace change can meet these objectives simultaneously. However, there will be cases where improving one outcome reduces another - for example, designing a route to minimise noise may increase greenhouse gas emissions.

The AND and ANG set out how the government has balanced these priorities and its overall ambition of modernised airspace in the UK.

⁸ [Introducing Free Route Airspace into the UK skies - NATS](#)

5. Summary of responses and government response on specific policy question

Transitional arrangements

In the Consultation the government proposed that:

The new ANG 2026 should apply to any new ACP that commenced after the date the final revised ANG was published.

Any ACP being sponsored by the UK Airspace Design Service (UKADS) should apply the ANG 2026.

Where an ACP was already underway at the point the new ANG was issued, if it had completed the Stage 2 gateway under the CAA's CAP1616 process (or equivalent in any successor process), it should continue applying the guidance set out in ANG 2017.

Other ACPs should apply the ANG 2026.

The aim was to reduce the risk of ACPs needing major rework and to allow well advanced proposals to continue using the previous guidance. The consultation asked for views on this approach and whether any other factors should be considered.

Some respondents used this question to set out their views about airspace change or aspects of aviation policy more generally. Where appropriate we have considered these points in relation to the relevant section of the ANG below.

Summary of responses in favour

Many respondents who supported the proposal simply stated their agreement without further comment. Those who did comment generally supported providing clear guidance for ACPs and reducing the risk of significant rework for proposals already well advanced. Several noted the costs and delays caused when the ANG was last updated and some ACPs had to restart.

Supporters and opponents alike stressed the need for clarity on which version of the guidance applies when an ACP continues under ANG 2017 (and the corresponding

CAP1616 version). They said this should be clearly stated on the CAA Airspace Change Portal⁹ and by ACP sponsors at each stage, especially during public engagement or consultation.

Some respondents felt the proposed backstop requiring ACPs in progress to be submitted to the CAA by July 2027 or move to the new ANG was too restrictive. Suggestions ranged from removing the backstop entirely to extending it to dates between 2029 and 2035.

Others said the ANG should allow flexibility in determining which version of the guidance applies, particularly in situations where airports within a cluster are at different stages of CAP1616. This was intended to avoid neighbouring airports within a cluster developing airspace changes under different versions of the guidance.

Summary of responses opposed

A range of respondents disagreed with the proposed approach. Some objected to specific elements, some argued that all ACPs should be required to move to the new process, and others said changes should not apply to ACPs already underway.

A number of responses said that there should be a stronger link between the planning and airspace change processes. This was so that decisions on new capacity or new runways taken through the planning process could consider any airspace implications. Many of these responses referenced specific planning proposals including the proposed third runway at Heathrow and second runway at Gatwick. An underlying concern from many of these responses was that people affected by a planning application or airspace change (or both) should be consulted and able to feed in their views before key decisions are taken.

Some responses argued that allowing ACPs that had already reached a certain stage in the process to continue under ANG 2017 risked 'locking in' earlier work on airspace design they believed was flawed. Others took the opposite view, saying ACPs already in progress should remain under ANG 2017 to preserve commitments made by sponsors.

A number of respondents said the new AND and ANG offer significant benefits and should therefore apply to all ACPs.

Others supported the principles of the proposal but said changes were needed to avoid unintended consequences. In particular, many responses felt that the proposed backstop date was too restrictive, suggesting either no backstop or a later date in the 2030s. Responses also said that there should be some flexibility - for example, if one airport within a cluster had not completed stage 2 but other airports had, it would make more sense for all of the airports in the cluster to continue using the same version of the guidance.

Government response

The government's view is that a clear and transparent approach to migration to the new version of the ANG is essential. We do not believe that the evidence supports a simpler

⁹ <https://airspacechange.caa.co.uk/>

approach of, for example, moving all ACPs onto the new Guidance at whatever stage they are currently at.

It is our expectation that a similar approach would apply to any consequential changes to the CAA's CAP1616 process.

Taking account of the feedback to the consultation, this migration process will be as follows.

The ANG 2026 will come into effect on 1 October 2026. It will apply:

- In respect of all ACPs commenced after the date at which the guidance comes into effect;
- Where an ACP designing a block of UK airspace that covers the area of airspace is managed by more than one airport and is being progressed by the UKADS;
- Where the sponsor of a Level 1 or Level 2 airspace change proposal commenced under the CAA's 2023 (or earlier) CAP1616 has not passed the consultation gateway (stage 3) on its proposal at the date at which the guidance comes into effect.
- The ANG 2017 (or ANG 2014 if applicable) continues to apply to other airspace change proposals that are in progress provided that an airspace proposal is submitted to the CAA for decision by the end of July 2031. The ANG 2026 will therefore apply to any airspace change proposal submitted to the CAA after this date.

The government also agrees with respondents that there should be some flexibility within this migration approach. As a result, the government's view is that where an ACP sponsor requests it, or where the CAA believes that it is necessary to support the delivery of an airspace cluster, the CAA may require an ACP sponsor to follow a specific version of the guidance even if it falls outside the criteria above.

This gives sponsors some flexibility if they believe there is a benefit to following or continuing on a particular version of the guidance, for example, to avoid extensive rework for a complex and well-advanced ACP. The CAA's role in considering any such request is important to ensure consistency between sponsors within an ACP cluster and to ensure that any such request can be considered holistically and to ensure that it aligns with the objectives of the airspace modernisation strategy.

In addition, the CAA is encouraged to consult the Secretary of State if it considers there is any doubt as to how it should apply this discretion in respect of an ongoing ACP.

This now refers to Level 1 and 2 changes¹⁰ only as they are the only ones that are subject to a consultation gateway and so provide a clean break. If a sponsor has completed the stage 3 gateway, they should be about to consult and therefore it is proportionate for them to remain on the ANG 2017, subject to the flexibility paragraph above.

¹⁰ The different levels of ACP are described on the CAA's website and in CAP1616:
<https://airspacechange.caa.co.uk/about-airspace-change/>

DfT has discussed with the CAA how this might affect or be applied to sponsors of ACPs which are currently in progress and our view on this is set out below.

- Airports within the Manchester cluster would remain on ANG 2017. With the criteria above, Manchester cluster ACPs could move onto the new version, but our current view is that in order to maintain progress and consistency, and given the maturity of the work completed to date, it would make sense for the cluster to continue on ANG 2017. DfT and CAA would be happy to discuss this further with the airports.
- The Scottish cluster airports have already passed the stage 3 gateway so would remain on ANG 2017.
- Around 5 other ACPs are expected to have their stage 3 gateways prior to the coming into force date so should be unaffected.
- One ACP is at an early stage of development so would be required to move onto ANG 2026.
- Seven ACPs are currently paused and if they restarted would need to move onto the new process.

There are a small number of ACPs underway using the CAA's CAP 725 process (the predecessor to CAP1616). These ACPs are all are post-consultation so they would not be affected as long as they conclude by July 2031.

Level 3 ACPs are not subject to a consultation gateway so would continue on their current guidance and must be completed by the backstop date of July 2031. In practice this will mean that a new sponsor could propose a new Level 3 ACP up to the effective date of the guidance and it would progress on ANG 2017 so long as it was completed by July 2031. We do not expect this to be an issue as Level 3 ACPs are those which would have a low impact on aviation and non-aviation stakeholders and are generally completed within 18 months.

Airspace Design Priorities

The government proposed replacing altitude based priorities within the ANG 2017 with a new system called Airspace Design Priorities. The objective was to simplify the criteria, provide more clarity on the relationship between airspace capacity and other criteria and set out clearly how to balance the key policy objectives of minimising noise impacts and improving flight efficiency (to minimise greenhouse gas emissions). The consultation proposed that minimising noise should be prioritised below 4,000ft and flight efficiency (to reduce carbon impacts and other greenhouse gas emissions) prioritised above that altitude. Specifically, we asked:

- Do you agree with the proposal to set out Airspace Design Priorities in order to give clarity on the trade-off and respective prioritisation of network efficiency (capacity) / flight efficiency (minimising carbon impacts) and minimising noise impacts?

- Do you agree that minimising noise impacts should be prioritised below 4,000ft and efficiency (minimising carbon on a per flight basis) should be prioritised at 4,000ft and above?
- Do you think the altitude where these priorities change should be 4,000ft or another altitude above 4,000ft? If you believe that the altitude at which minimising carbon emissions is prioritised should be set at a different altitude, what do you think it should be? Please explain your answer and provide any supporting evidence.
- What, if any, other factors do you think should be considered as part of the strategic priorities and why?

This was the most significant policy proposed in the consultation and generated the greatest level of interest and comments.

Summary of responses in favour

Airspace Design Priorities

Responses in favour (predominantly from organisations, including airlines, NATS and a number of airports) were broadly supportive of moving from altitude based priorities to a clearer set of Airspace Design Priorities. They welcomed the intention to simplify decision making and remove ambiguity in how trade-offs are made, particularly where noise and greenhouse gas considerations intersect.

The proposed reduction from three categories¹¹ to two was viewed as a pragmatic change that should streamline assessments and make the ANG easier to apply in practice. Stakeholders added that clear prioritisation materially aids strategic choices -such as those associated with airport growth - by giving sponsors and regulators a more transparent basis for decisions.

Responses noted the limitations of the current altitude based hierarchy and reported that it has sometimes led to confusion, delay and a tendency towards “box ticking” in some cases rather than optimal outcomes. They noted that airspace design below 4,000ft is already highly constrained and comparatively straightforward, whereas the real burden falls between 4,000ft and 7,000ft. In that band, some responses noted that sponsors have often been required to develop and assess multiple options which may be operationally challenging or unlikely to be deliverable, creating unnecessary complexity, additional time and higher costs. This also sometimes created unrealistic expectations that a change was possible for overflowed communities. The absence of clear direction on how to balance noise and greenhouse gas emissions between 4,000ft and 7,000ft - either against one another or against other government priorities - was identified in many responses as a central cause of uncertainty and inefficiency. Multiple responses also commented that a blended noise/ greenhouse gas emissions priority across this band can be complex to apply in practice, reinforcing the case for a simpler framework.

¹¹ Currently noise is prioritised below 4,000ft, reducing carbon prioritised from 7,000ft and between 4,000ft and 7,000ft noise is prioritised unless there is a significant impact on carbon emissions.

Stakeholders considered that the revised approach proposed in the consultation, and especially the clearer delineation between noise impacts and greenhouse gases, would make assessments more transparent and proportionate. They expected this to reduce duplication, cut the need to explore impractical alternatives and improve the consistency of outcomes.

Some ACP sponsors said it would help to set explicit priorities for capacity, minimising greenhouse gas impacts and minimising noise impacts, noting that current guidance has left sponsors to make their own judgements on capacity and efficiency. In their view, the proposed guidance provides clarity for change sponsors and stakeholders. Other responses observed that clear priorities are particularly valuable where planning permission for the expansion of an airport enables increased output, as they help sponsors design and justify efficient routes while addressing environmental effects in a consistent way that takes account of any planning requirements.

Overall, responses expected that a streamlined set of Airspace Design Priorities would reduce unnecessary option development - especially in the 4,000 - 7,000ft band - shorten timelines, lower costs for both sponsors and the regulator, and improve the transparency and consistency of trade-offs between noise and greenhouse gases. They also anticipated that this clarity would better support decisions on capacity and efficiency in line with wider government priorities.

Deliverability

Responses in favour, particularly from industry stakeholders, generally supported prioritising flight efficiency and reducing greenhouse gas emissions from 4,000ft and above, noting that the proposed trade-offs would help deliver the government's climate objectives while supporting economic growth. They considered that prioritising efficiency above this level should make the airspace change process quicker by aligning assessment more closely with how the system actually operates. Stakeholders added that simplifying priorities at 4,000ft and above would reduce time spent on theoretical modelling that is not operationally viable.

Several responses suggested that the 4,000ft threshold could represent a significant improvement for airports operating in complex environments such as the London Terminal Manoeuvring Area (TMA). Below 4,000ft, flight paths are comparatively predictable and contained, allowing meaningful engagement with communities who may be most affected by noise and giving sponsors greater certainty about how a design will operate in practice. Above 4,000ft, aircraft are frequently subject to tactical vectoring¹² to maintain a safe and efficient service, which makes noise modelling for multiple potential routings confusing, expensive and time-consuming without necessarily delivering better outcomes. Some responses argued that focusing the noise priority below 4,000ft could make consultation information more focused on those most directly affected, improving the quality of engagement by concentrating on those most affected by aircraft noise.

Stakeholders also highlighted the operational logic of the change. At and above 4,000ft, aircraft typically transition to climb or approach profiles in which speed, altitude

¹² Tactical vectoring is the real-time use of radar vectoring by air traffic controllers to manage traffic dynamically—such as resolving conflicts, maintaining separation, or sequencing aircraft—rather than following pre-planned routes or procedures.

management and fuel-burn efficiency dominate. Shifting the priority to flight efficiency and carbon reduction at this level was viewed as consistent with industry practice, and as an enabler of more continuous climbs and descents that can simultaneously improve noise outcomes and reduce emissions. Many industry respondents stressed that the UK's airspace modernisation needs to proceed at pace to secure carbon savings, better noise management, additional capacity and improved resilience; in this context, several noted that without the proposed change it would be very difficult to progress effective airspace change in the London TMA.

The guidance was seen by some stakeholders as bringing significant benefits in the most complex design regions, where multiple, competing priorities currently add to the design burden. Designing to a single, clear set of priorities, noise below 4,000ft and efficiency above was expected to simplify tasks substantially for sponsors, including in congested areas such as the London TMA while still allowing flexibility elsewhere to deliver meaningful emissions reductions. Some sponsors indicated agreement with prioritising the minimisation of noise impacts below 4,000ft and the minimisation of per-flight carbon impacts from 4,000ft and above. Sponsors also noted that raising the proposed altitude would undermine the efficiency gains the policy is intended to deliver and would not address the complexity and consultation challenges experienced to date.

Currently, above 4,000ft manual intervention by air traffic controllers is necessary in complex areas of airspace to deliver a safe and efficient service within the performance targets set by the CAA. This leads to less predictable flight paths and significant swathes of the London and South-East region being overflown at levels between 4,000ft and 7,000ft. This has an impact on the capacity and resilience of the airspace, as well as on noise.

Overall responses in favour indicated that prioritising noise below 4,000ft was essential to ensuring that a design for London airspace was deliverable. They argued that design complexity increases dramatically above 4,000ft, which at best would have a significant cost and time impact.

Summary of responses opposed

Aviation noise

Many responses, including most responses from individuals and community groups, argued that aviation noise is a significant public health concern and should remain a primary consideration in airspace design. They pointed to links between aircraft noise and sleep disturbance, cognitive effects and cardiovascular risks, and stressed that these outcomes must inform policy choices. Many noted other options to reduce carbon emissions - such as caps on ATMs, alternative fuels and wider operational measures - relative to levers to reduce noise exposure, which is overwhelmingly concentrated near airports and along take-off and landing paths. In their view, this asymmetry warrants keeping noise as the dominant priority for longer in the climb and approach phases.

A common concern was that moving to 4,000ft would weaken protections for residents under flightpaths. Community groups reported that aircraft operating between 4,000ft and 7,000ft - and sometimes higher - still cause a disturbance to those on the ground, particularly across densely populated areas such as London. Deprioritising noise at these altitudes could lead to more frequent and concentrated overflight over certain corridors,

reduced opportunities for respite and increased annoyance, sleep disturbance and complaints.

Several responses contended that the proposed approach effectively sidelines noise considerations between 4,000ft and 7,000ft when approving or allocating flightpaths, despite evidence of ongoing ground-level impacts. They also questioned the rationale for choosing 4,000ft, arguing that the historic use of vectoring from that altitude reflected a different era of traffic volumes and should not be used to justify a modern noise cut-off. In their view, the consultation had not demonstrated a change in the underlying evidence since earlier guidance that recognised noise effects up to 7,000ft.

Stakeholders in opposition proposed a framework retaining noise as a consideration above 4,000ft, especially where impacts are concentrated, cumulative or prolonged. Some suggested setting the transition altitude somewhere above 4,000ft but below 7,000ft or maintaining the existing 7,000ft priority unless there are unreasonable safety or environmental consequences. Others said that focusing the noise priority only to 4,000ft risks misalignment with planning or consenting processes that already take account of community impacts at higher altitudes. A handful of responses suggested that the current altitude must be maintained or raised (e.g. to 10,000ft) to further protect communities and reduce noise and environmental pollution going forward.

Overall, responses considered that setting the threshold at 4,000ft would impose additional health, social and economic burdens on overflown communities while granting excessive flexibility to industry and regulators at the expense of residents' protections.

Evidence

Many responses questioned whether the consultation presents a sufficiently robust evidence base for changing the priority threshold to 4,000ft. They argued that the social, environmental and noise costs associated with a substantial reorganisation of flight paths could be very significant and need to be transparently assessed and incorporated into the appraisal underpinning the proposals. In their view, government policy appears to privilege hypothetical, unquantified carbon reductions over immediate and well-documented impacts of aviation noise on communities.

A key concern raised in multiple responses was the absence of quantified analysis of the claimed carbon benefits in lower airspace. Responses noted that the consultation asserts emissions savings without publishing supporting modelling, sensitivity tests or trial data, and does not quantify the scale of any potential reduction. Several responses called for greater transparency, including published methodologies and independent review, including modelling of non-CO₂ climate impacts, so that claims of environmental benefit can be scrutinised on a consistent basis. In particular, stakeholders requested a clear explanation of any headline emissions estimates, accompanied by the underlying data and assumptions.

Some responses argued that any fuel or CO₂ savings achieved between 4,000ft and 7,000ft may be relatively limited as a share of a full flight, with some citing indicative differences between a noise preferential route and a more direct track on the order of a few tens of kilograms of fuel, well below one per cent of total burn. In contrast, they said most decarbonisation benefits were said to arise from continuous climb operations above 7,000ft, more direct routing at higher altitudes, sustainable aviation fuels, fleet renewal and

wider operational improvements. No specific evidence was presented. They felt that marginal, and unquantified, savings near airports should not override real and immediate community noise impacts.

Stakeholders questioned the proportionality of the proposed trade-off, particularly around major airports with high population density. They expressed concern that applying the same rule at all airports implicitly accepts different health costs for similar carbon benefits, depending on location. Some argued that the consultation had not demonstrated that the expected carbon savings are proportionate to the resulting community impacts, nor that equivalent or greater benefits could not be achieved through alternative policies. Several responses also highlighted internal tensions within the case for change. They noted that the consultation material acknowledged the possibility that efficiency-led changes could indirectly unlock additional capacity, with associated risks of offsetting any carbon gains.

Stakeholders also challenged the evidential basis for treating 4,000ft as a hard transition point for noise. They observed that noise impacts do not cease abruptly at 4,000ft but diminish gradually and vary by aircraft type, climb or approach profile, frequency of overflight, route concentration and local population exposure. In their view, the proposed cut-off looks like a policy simplification rather than an evidence-based threshold and risks undervaluing real community impacts between 4,000ft and 7,000ft.

Across submissions, there were also calls for transparent, airport-specific analysis of noise exposure at multiple altitudes to show how exposure changes with height for different aircraft types and procedures. They also asked that any economic appraisal incorporate the health and wellbeing costs associated with noise, so that trade-offs between greenhouse gases, capacity and noise are evaluated on a consistent and proportionate basis.

Several submissions highlighted perceived gaps and limitations in the Options Assessment that was published alongside the consultation. They pointed out that examples focus on Heathrow and do not set out comparable evidence for other major airports, such as Stansted, where nighttime operations are extensive. Those responses argued that the percentage impact on communities exposed at night could be more severe in such locations, and that without airports specific analysis it is difficult to assess distributional effects or the proportionality of the policy across the network.

There were calls for a robust, strategic cost-benefit analysis that weighs the economic, environmental and health consequences of the proposed change. Stakeholders asked that the burden of proof rest with those proposing the change, demonstrating that carbon and capacity benefits would outweigh the additional noise and health costs. They requested that the assessment include: monetised and non-monetised health impacts; sensitivity analysis; scenarios for different fleet mixes and procedures; and evidence on how climb rates and profiles affect both fuel efficiency and noise outcomes.

Overall, responses opposed to prioritising noise below 4,000ft expressed the view that any efficiency gains between 4,000ft and 7,000ft are inconsequential when set against the scale and immediacy of noise impacts on local communities. They supported continued efforts to decarbonise aviation, such as accelerating sustainable fuels, optimising high-altitude routing and considering wider measures to manage demand, but argued that near airport noise should remain the leading priority in lower airspace to safeguard health and quality of life.

Consultation

Many responses expressed concern that the proposals could reduce the meaningful consideration of those affected by airspace change from having their views on flight path design taken into account. Some responses raised concern about the exclusion of households under flight paths between 4,000ft and 7,000ft from meaningful participation and from consideration in decision making, which they view as fundamentally unfair and unjustified, although this was not something that was proposed by the government given that any consultations would be open to the public overall. Reducing CO₂ was acknowledged as important, but many responses said that this should not come at the expense of residents' voices or reduced transparency about the ramifications of airspace change on health and quality of life. A number of airports responded that they were concerned that this perception could damage relations with local communities.

Some sponsors also noted that it is difficult to explain the current air traffic picture, or the impact of cumulative changes to flight paths, in a way that's accessible and meaningful to the public.

Some stakeholders were concerned that the proposals created uncertainty about whether noise above 4,000ft would continue to be analysed and reported. They stated that, even where noise is not the leading priority, sponsors should still provide information on potential adverse effects in line with established policy, including the Noise Policy Statement for England (NPSE) and recognised metrics such as the LOAEL. In their view, noise impacts should continue to be modelled and presented to the government defined altitude limits to ensure effective and accessible consultation.

Several responses pointed to the Options Assessment and accompanying cost benefit material, expressing concern that excluding a substantial proportion of people who may experience health effects from aircraft noise from the health impact calculations could neither optimise route selection nor adequately quantify the population level impact. They considered that any change which results in communities experiencing noise from aircraft above 4,000ft being omitted from assessment would weaken protections, overlook health impacts associated with aircraft noise, and undermine confidence in the process.

Across submissions there were calls for clear assurances that, regardless of where the priority boundary is set, ACP sponsors will continue to model, assess and publish noise information up to 7,000ft, and to engage communities and ACP partners whose areas may be overflowed. Responses argued that maintaining inclusive, meaningful consultation supported by transparent modelling and reporting is essential to uphold fairness, meet public health obligations and sustain trust in the airspace modernisation programme.

Noise studies and metrics

Many responses said that the government should consider the findings from ANAS and ANNE Part 1 research before finalising the guidance¹³.

Some responses viewed these studies as intrinsic to any updated modelling of the financial and distributional impacts of aviation expansion and airspace change, and

¹³ At the time of the AND and ANG consultation these studies were being completed. They have now been published and their findings have been taken into account.

therefore core to informing updates to other policy frameworks such as the Airports National Policy Statement. They considered it premature to reach conclusions while key government-sponsored research is due to report, and asked for explicit confirmation that the findings will be integrated once available.

Stakeholders said that they thought the direction of travel is towards more stringent noise controls, reflecting growing understanding of links between noise exposure and health. They argued that using legacy thresholds or relying primarily on LAeq (Level A-weighted Equivalent Continuous Sound Level) could understate material effects, particularly for night operations and for communities experiencing concentrated or frequent overflight. Several responses cautioned that proceeding on the basis of older standards, when new survey evidence may challenge previous assumptions about annoyance and health outcomes, risks locking in guidance that will quickly become out of date.

Responses also argued that any change to Airspace Design Priorities should be grounded in a comprehensive evidence base on aviation noise, using metrics that reflect how communities experience sound. They noted that reliance on LAeq alone risks under-representing the full range of impacts, citing international guidance that average-energy measures capture only part of the effect and should be complemented by additional indicators such as Lden (Day-Evening-Night Level or Lnight (Night-time level), maximum event levels, frequency-of-overflight and time-of-day sensitivity. In this context, submissions pointed to the World Health Organization's recommended lower thresholds (for example, day-evening-night and night limits) as a relevant benchmark for assessing health-related outcomes and for setting policy limits that better protect communities.

Priority 3 clarification

Some responses felt that the proposed approach ("minimise change to the areas where aircraft noise is currently experienced below 4,000ft"), could lead to greater concentration of noise over communities that are already heavily overflown. They argued that setting the priority change at 4,000ft may incentivise tighter, efficiency led routing below that level and encourage concentration above it, thereby worsening outcomes for those directly under established tracks. Some responses argued that current flight paths already disproportionately affect certain communities, and further concentration, without explicit monitoring and safeguards could exacerbate health and quality of life impacts for those residents.

A number of responses said that this could unintentionally lock in existing distributions. Some read "minimise change" as avoiding newly overflown areas; others interpreted it as minimising changes in noise levels within areas that already experience overflight. Several responses requested wording that specifies "minimise any increase in noise in areas where aircraft noise is currently experienced," while also acknowledging the need to respect planning decisions already granted but not yet implemented. Others said that Priority 3 should explicitly require avoiding new overflight and reducing noise where practicable in areas already affected.

Some stakeholders advocated for respite and "fairness" in design, cautioning against creating permanent "winners and losers". They suggested using wider paths, multiple route options or time-based alternation to distribute effects and provide predictable breaks from noise, especially where airports are expanding and the number of events over the same communities is increasing. Some argued that widening approaches could provide

meaningful respite for communities suffering frequent overflights. Many responses had different views of what “fairness” might look like. Other responses, drawing on practical experience (for example, work by local noise boards), noted the difficulty of defining “fair and equitable distribution” and suggested that minimising change to areas already accustomed to aircraft noise may be preferable to introducing new populations to overflight, illustrating the tension between stability and sharing as policy aims. Several submissions proposed revised drafting for Priority 3.

Air pollution

Responses opposed to the proposal also noted concerns around air pollution, saying that ultra fine particles can travel many miles downwind of airports and affect local air quality. Their view was that the exclusion of pollution above 1,000ft should therefore be revised to allow such impacts to be identified and considered in ACP decisions.

Government response

The government has carefully considered all responses. It is clear that aviation noise remains a matter of significant public concern, as strongly reflected in consultation feedback. Airspace modernisation is long overdue and is expected to deliver airspace that is quieter and cleaner than the current system. The government recognises the impact that aviation noise can have and that this and other environmental factors need to be balanced against the jobs and other economic benefits provided by the UK’s aviation sector.

Together with the responses to the consultation, the findings of the ANAS and ANNE Part 1 studies, published on 10 June, have been considered in developing the Airspace Design Priorities. The LOAEL policy is 51db LAeq for daytime noise and 45 dB for night noise. These contours generally fall within the Airspace Design Priority for noise at 5,000ft. The studies suggest greater annoyance outside these contours than previously. Any wider change to LOAEL policy as a result of these studies would be considered separately and be subject to consultation. Prioritising noise to a higher altitude would require a trade-off with efficient airspace design and may lead to unintended consequences. For example, in the South-East airspace is already congested so prioritising noise to a higher altitude may not be practical or lead to different outcomes.

This represents a balance - there is no single solution which meets all of the competing concerns.

Certain key airspace design measures that can reduce noise impacts, such as enabling smoother ascents and descents, become harder to implement where noise is prioritised at higher altitudes. The ANG 2017 recognised that a ‘one size fits all’ approach would be unworkable, so focused on decisions being informed by the needs of each area, using robust local evidence and improved transparency to try to encourage the aviation industry to improve standards and engage effectively.

Only one major airspace change has been completed while the ANG 2017 has been in force. Responses to the consultation support our view that the existing guidance causes confusion about how to balance noise and greenhouse gas impacts versus other priorities.

The Airspace Design Priorities within the ANG 2026 provide a set of clear priorities for airspace design, including how noise, greenhouse gas emissions and flight efficiency are to be balanced. These have been amended in the light of the feedback received. The key points are:

- Greater priority will be given to minimising noise in airspace design, which will now be prioritised below 5,000 feet.
- Flight efficiency (to reduce greenhouse gas emissions) will be prioritised above that altitude.
- Clarification in the wording of the Airspace Design Priorities will be clear that any planning requirements should be taken into account when defining the capacity that the airspace design is required to meet. This makes it clear that the airspace design would need to take account of any planning conditions, for example, in relation to noise, which might be attached to a permission to build new airport infrastructure.
- In addition, there have been a number of clarifications in the text including alignment with the Noise Policy Statement for England, the threshold for changes in noise referred to in the Airspace Design Priorities, and reference to the LOAEL.
- The government carefully considered whether Airspace Design Priority 3 could be made more flexible to avoid a situation where, for example, the guidance would mean that an existing flightpath that flew over people would be prioritised over a new flightpath which avoided flying over people. Given the built up nature of areas around airports that it is highly unlikely that this choice would ever occur, and in practice incorporating such flexibility would create a disproportionate regulatory burden for little or no benefit.
- The government's policy in relation to local air quality is unchanged from the ANG 2017 and is to minimise local air quality emissions and in particular ensure that the UK complies with its international obligations on air quality.

We agree with stakeholders who said that transparency in the modelling of carbon and noise impacts is a key element of the design process. These considerations will inform future appraisal requirements under CAP1616.

While it is not possible to quantify in detail the carbon savings and efficiency gains until flightpaths have been designed, we do consider that these benefits are achievable - for example, modernisation has seen considerable reductions in carbon emissions in upper airspace.

Following the consultation, further work has been undertaken, looking at noise contours at different altitudes, compared to the 51dB LOAEL at a range of different UK airports, taking into account the emerging findings of the ANAS and ANNE Part 1 reports. These are included in the updated Impact Assessment. We have used this work to consider the benefits and disbenefits of prioritising noise to different altitudes, both in terms of the geographical areas covered and the potential implications for airspace design. These broadly show similar outcomes, albeit with a smaller effect, to the example of Heathrow that was included in the consultation Options Appraisal.

We note that a number of responses expressed concerns that people affected by an airspace change would lose their ability to have a say on it before decisions are taken. This has never been the intention. The government's view is that maintaining inclusive, meaningful consultation - supported by transparent information and reporting - is essential to uphold fairness, meet public health obligations and sustain trust in the airspace modernisation programme.

Meaningful consultation with people who may be affected is and will remain a fundamental part of the airspace change process. Consultations will be public and anyone can feed into them.

Regardless of the altitude at which noise is prioritised, any airspace change must set out at an appropriate level of detailed analysis of the potential impacts to ensure effective consultation.

Information about the impacts of a specific change is required as part of CAP1616 so would be developed as part of the design process and be used to help inform design choices (and be made available as part of the consultation).

Future airspace changes will follow the CAP1616 process, as part of which impact assessments will be conducted by sponsors in line with the revised AND and ANG to ensure that communities affected are duly appraised of the proposals and consulted.

Airspace trials and temporary airspace changes

An airspace trial and temporary structure can play a vital role in supporting the development and integration of new airspace users into UK airspace through testing of innovative airspace design, technology or ATC operational procedures.

The government's objective is to support trials and Uncrewed Aircraft System (UAS) operations which can help build the evidence base to support the delivery and assessment of long-term operations of new technologies.

We proposed providing greater clarity in the AND and ANG on the permitted length of airspace trials and temporary airspace structures, including allowing the CAA to use its discretion on the environmental assessments required for UAS trials. Specifically, we asked:

- Do you agree or disagree with the proposal to extend the permitted duration of airspace trials to 3 years? If you disagree, please explain why.
- Do you agree or disagree with the proposal to extend the permitted duration of temporary changes to airspace structures for up to 180 days? If you disagree, please explain why.
- In your view what other factors, if any, should be considered when deciding on extending the permitted durations of routine airspace trials and temporary structures?
- Do you agree or disagree with our proposal to give the CAA the flexibility to disregard the impacts on the environment when considering ACPs for an airspace trial? This

would only apply in respect of ACPs submitted for the purposes of enabling UAS flights to support policy development for UAS BVLOS trials. If you disagree, please explain why.

Summary of responses in favour

Those who were supportive of the measures argued that the current time limit is too short to justify the significant cost, complexity, and resource investment required to initiate trials, many of which rely on grant funding. Longer periods are essential for gathering robust, seasonally varied datasets, assessing system resilience in real-world conditions, and building an evidence base for safety, reliability, communications, and navigation performance.

Extended trials are considered especially valuable for BVLOS operations, medical logistics, and emergency services, where operational continuity and long-term data generation are critical. Some aviation industry respondents also note that weather variability often disrupts shorter trials, undermining their reliability.

However, even those supportive stressed the need to protect conventional aviation. They highlight risks relating to capacity, safety, and ATC workload, and caution that new airspace users such as drones and electric Vertical Take-Off and Landing aircraft must not be given priority over established aviation operations.

Across the responses many requested a proportionate, case-by-case approach, with clear justification for extensions, and structured review points. They argue that trial durations should be aligned with complexity and risk, rather than adopting a one-size-fits-all approach.

Some ACP sponsors highlighted the need for clearer guidance on the relationship between trials and temporary airspace structures, as well as the potential value of a defined 'Pathway to Permanence' for trials that demonstrate long-term safety and performance benefits.

With regards to the current environmental assessment requirements, many responses argued that they are currently disproportionate for small-scale, temporary, or low-impact trials and believe that more streamlined processes would better enable innovation and policy development.

They emphasise that traditional environmental assessment frameworks were designed for conventional aircraft and may not be suitable for emerging aviation technologies, particularly where there is not already evidence about potential impacts to inform any assessment. They agreed the CAA should have the discretion to determine what level of assessment is "sufficient and proportionate", recognising that data on new technologies is limited and that flexibility can accelerate learning. Some highlighted that trials themselves help generate evidence that will inform more robust, fit-for-purpose environmental assessment approaches in the future.

Summary of responses opposed

Most responses opposed to this measure came from community groups, local councils, environmental groups, and individuals. These responses expressed opposition to

extending airspace trials to three years, despite the CAA already being permitted to do this under certain circumstances. It was argued that such prolonged periods risk causing significant and sustained noise, stress, and disruption, citing previous experiences. Many expressed concern that long trials of this length could lead to permanent airspace changes without adequate safeguards or oversight - ultimately being used as a mechanism to bypass the full airspace change process. There was a general call for shorter default trial periods (typically 6 -12 months), with robust mechanisms for early review, community feedback, and suspension.

Many respondents argued that noise and community impacts must remain integral considerations in all airspace changes, regardless of their scale or duration.

Concerns were expressed of the potential for unmanaged noise disturbance, privacy intrusion and impacts on wildlife, all of which are heightened at low altitude and the repetitive nature of UAS and BVLOS operations. Whilst recognising the importance of supporting innovation, a system of proportionate but mandatory environmental assessments was deemed essential. This included more streamlined processes, defined exclusion zones for sensitive environments and greater community engagement.

Airport operators and aviation industry bodies expressed the view that environmental consideration was essential to maintaining public confidence and that innovation proceeded responsibly. Some responses acknowledged that drones may offer environmental benefits, such as a reduction in surface transport emissions, but that such benefits must be evidenced through proper assessment rather than assumed.

Those opposed clearly stated that environmental assessments should not be removed.

Government response

Airspace trials and temporary structures provide invaluable opportunity for the industry to test new airspace design, technologies and procedures. This is to ensure that any future, permanent change stands the best chance of success, whilst mitigating any environmental impacts. Many of these trials and temporary structures form part of viable, real-world operations that are actively contributing to the growth of the UK's commercial drone sector and supporting wider government objectives.

Supporting the introduction of new aircraft systems and their integration into UK airspace is extremely challenging but has been deemed a priority by this government. The government's objective remains to support trial operations which can help build the evidence base to support the delivery and assessment of long-term operations of new technologies.

Trials and structures should be made sufficiently available to enable government, the CAA and industry to collect data to support policy making in the development of appropriate regulatory frameworks. This will support development of CAA guidance on the impact of noise and visual intrusion from drone activity for future airspace change proposals.

The complexity of the operations means that, to ensure the necessary data and evidence is obtained and the trials successfully meet their objectives, the CAA should have the discretion to extend trials to three years, and temporary airspace structures to 180 days. The existing AND already permits this activity up to three years in exceptional

circumstances and this change will provide the CAA the discretion to determine an appropriate period for trials on an individual basis. This change will reduce the administrative burden of the process and provide greater flexibility for both the CAA and operator.

We have been clear that this bespoke arrangement will not become a blanket ‘extension’ for all, including not acting as an alternative to undergoing the full airspace change process. We have also clarified our requirement that noise complaints during a trial or temporary airspace change should be sufficiently monitored by the sponsor and reported to the CAA so, if necessary, the CAA can take further action or curtail the trial.

A key objective for updating the ANG is to ensure that the guidance can be applied appropriately to the wide range of diverse airspace activity which takes place. Noise impacts of these technologies are likely to differ in important ways from those associated with conventional aviation. While some drones may be quieter at source, their operational characteristics may lead to new patterns of noise exposure. Developing a proportionate, evidence-led and adaptive approach will be critical to sustainable development of Future of Flight technologies and maintaining public trust. We have asked the CAA to examine the implications of emerging aviation technologies on the aviation noise policy in the UK, however the gathering of data and evidence from trials will be key to supporting this.

To support this work and the development of a dedicated noise policy for UAS operations, it remains our intention to guide the CAA that it is not required to take into account environmental impacts when considering airspace trials for the purpose of enabling UAS flights which support policy development and learning. Like the above, there appears to have been some confusion amongst respondents over the scope of airspace trials which this could apply to. This measure is not intended to be permanent and is being implemented whilst government develops policies and assessments applicable for airspace users such as UAS and the evidence base is developed that would allow more through assessments in the future.

As outlined above, this measure will also be subject to noise monitoring during the trial or temporary structure. This activity will be key in supporting future government policy development whilst taking into account its impacts on all stakeholders.

Call-in of airspace changes

The government’s view is that most airspace change decisions are best taken by the CAA as the independent regulator due to their complex and technical nature. However, there may still be some occasions where the decision should ultimately be taken by the Secretary of State.

Our consultation proposed a number of changes to the call-in process, including clarifying and simplifying the call-in criteria so that only ACPs of strategic national importance are eligible for call-in. We also proposed setting time limits for the process to reduce uncertainty for the aviation industry and local communities. Specifically, we asked:

- Conceptually do you agree or disagree that the Secretary of State should retain the ability to ‘call-in’ an airspace change?

- Do you agree or disagree with the criteria proposed for the Secretary of State to call-in an airspace change?
- Do you agree or disagree with the proposal to create time limits in relation to requests to call-in an airspace change?

Summary of responses in favour

There was broad agreement from both individuals and organisations that the Secretary of State should retain the ability to call-in an airspace change. Individuals provided no written feedback on why they agreed and organisations provided limited feedback.

The feedback provided by organisations agreed that it is right for the decision to sit with Ministers who are democratically accountable where airspace changes create clear gainers and losers, redistribute impacts between communities, involve trade-offs between airports or regions, or the decisions being taken extend beyond technical regulation. Other responses said that the Secretary of State should only be able to call-in an airspace change under strict criteria to avoid issues becoming politicised. Otherwise, all airspace change decisions should sit with the CAA. It was also highlighted that the term “strategic national importance” should be defined on evidence-based criteria that are set at the appropriately high level, however, no examples of what the criteria should be were provided.

There was broad support from organisations on the proposed criteria for the call-in process, but individual responses were evenly split between those who agreed and who opposed. Written feedback on the reason for agreeing to the criteria was predominantly provided by organisations. Some of the main themes were that the proposed criterion would help to reduce uncertainty and delays, it would represent a considerable improvement on the current arrangements and that the six-week window for a call-in to be proposed was appropriate.

Some considerations were suggested by those in agreement, predominantly by organisations asking for clear definition and criteria of what would be included in the term “strategic national importance”, clarity on who can initiate the proposed call-in process and, if a proposal were to meet the criteria for call-in, whether the CAA should engage with the Sponsor and relevant Partner to consider their views.

There was broad support from both individuals and organisations of the proposed creation of time limits for call-ins of airspace changes. Some changes were suggested including extending the call-in period to 1 to 3 years as they felt 3 months was too short and there was a danger that communities would not be aware of the shorter deadline. Many sponsors agreed with the 3-month time limit, but some opposed the possibility to extend it for an extra 3 months. Some responses asked for proportional timelines for smaller airports with limited resources. Most comments came from organisations.

Summary of responses opposed

Most responses opposed to the proposal came from individuals, with only one airline and one airport opposing. Their reasons were that the criteria should avoid politically motivated decisions, and any decisions should be made on grounds of evidence and safety.

Individuals raised concerns that the Secretary of State could use the powers for both political and personal reasons, rather than basing them on evidence. They also voiced the worry that the Secretary of State would not be informed enough to make a considered decision due to the technical nature of airspace.

Of those who disagreed with the proposed criteria for the call-in process, the main reasons given were that the scope was too narrow, with several requests for it to be extended to include noise and the impact it has on communities. Some responses stated that they could not answer the question without the criteria of what would be considered “strategically important” made clear.

There were also concerns raised by community groups and individuals over the credibility of the CAA to make all other decisions regarding airspace changes. Some did not feel that the CAA is an independent regulator as many of its employees have an aviation background or aviation interests.

Some who disagreed with the proposed time limits felt that the 3 months limit was too short a period and that the time limits should remain flexible. There were also some concerns that assessment of an ACP would have to be conducted immediately to allow time for analysis and to build a case for a call-in request, so any communities that weren’t immediately aware of any impacts would be too late to action a request.

Government response

The following airspace call-in process has been developed following the feedback received from the consultation:

- A call-in request must be submitted to the CAA within the 6-week window.
- If a call-in request meets the criterion of “strategic national importance” it is to be submitted to the Secretary of State for review.
- Following receipt of a call-in request the Secretary of State will have 3 months decide whether to proceed with calling in the airspace change, with the possibility to extend for another 3 months.
- If called –in, the Secretary of State will make a decision within 3 months, with the possibility to extend for another 3 months.

The government agrees that it is necessary for the Secretary of State to retain the ability to call in an airspace change on the grounds that it is of strategic national importance. The call-in process provides Ministerial oversight and accountability of CAA decisions with regard to changes to airspace; any individual can request the Secretary of State to call in a decision on an airspace change where it meets the criterion of strategic national importance.

The government has noted the need to provide greater clarity on the definition of “strategic national importance”, and this will be set out in separate, more detailed guidance on the call-in criteria.

There were some concerns raised regarding the adoption of time limits for the Secretary of State to both decide whether a call-in should be made, and if so the timescales for making a decision. It is important for the government to provide stability for both airspace change sponsors and local communities.

The proposal to implement a 3-month time limit for the Secretary of State to make a decision on a proposed call-in, and the option to extend it for an additional 3 months, will be taken forward to enable a faster and clearer process. This will help minimise programme delays, avoid additional costs for sponsors, and reduce uncertainty for local communities. As is the position today, the CAA will be required to make information available to the public via the CAA Airspace Change Portal, to reduce the risk of anyone missing the opportunity to request that an ACP decision is called in.

Approach to non-airspace environmental assessment requirements

The airspace change process is subject to environmental assessments to determine the effect of the change proposal on overflown areas. The Habitats Regulations Assessment (HRA) is a legal process designed to protect European sites of ecological importance in the UK from potentially harmful development or activities. The screening stage of the HRA determines if a plan or project is likely to have a significant effect on a European site, and if it is determined to do so, the competent authority is required to do an appropriate assessment. A Strategic Environmental Assessment (SEA) is a statutory process used to evaluate the likely significant environmental effects of certain plans and programmes before they are adopted.

The government asked for evidence in the consultation on the impacts to airspace change sponsors of undertaking assessments in relation to airspace changes that are specifically required by non-aviation legislation. This included evidence of the costs and benefits of these processes, their complexity, and whether additional guidance in relation to ACPs might be helpful.

The consultation asked:

- Have you undertaken environmental assessments required by non-aviation legislation in relation to an airspace change? What was your experience of this and what were the costs and benefits?
- In carrying out this assessment, was guidance available and was it helpful?
- Would further guidance in relation to how such requirements might be applied to airspace change be helpful and, if so, what should it include?

Summary of responses in favour

Only a small proportion of respondents to the consultation answered that they have undertaken an environmental assessment. Some responses said that environmental assessments can demonstrate compliance with the CAA's regulatory requirements for airspace change as well as relevant environmental legislation.

Respondents noted that the HRA provides transparency to stakeholders and regulators, including one respondent who said environmental assessments are a beneficial tool to be used in the consultation. Environmental assessments help identify any genuine noise or ecological impacts and ensure appropriate mitigations. It also helps build an evidence base to inform more proportionate and consistent approaches to environmental assessment for future UAS operations.

Summary of responses opposed

Respondents who opposed said that the HRA is not appropriate for airspace design. Detailed commentary was provided by a few respondents who said that these assessments are not tailored to airspace change and should not be applied. These responses said HRA requirements do not align well with aviation-specific environmental assessment processes, causing internal inconsistencies and extended timelines.

One respondent outlined that the HRA was not written with reference to airspace design or aviation operations. Another respondent added similar commentary, using examples for their completed HRAs. In these cases, neither the HRA nor SEA impacted the airspace design. Some airports also provided a response based on their experience with environmental assessments, saying it was intensive, and no changes were required to their options as a result.

One respondent explained the benefit of environmental assessments in the context of Statutory Nature Conservation Bodies (SNCBs) advice. They explained how limited scientific evidence on how aircraft noise and emissions affect designated ecological sites makes it difficult to set robust screening thresholds, leading to precautionary approaches and additional consultation with SNCBs. Additionally, differing expectations in the assessments and approaches between environmental assessments and SNCBs can create delays, inconsistency and regulatory uncertainty.

The general consensus across these responses was that the HRA framework does not translate effectively into the context of airspace change. Respondents said the HRA adds cost and complexity noting yet rarely influences design outcomes or provides meaningful environmental insight.

One respondent explained that the HRA screening had a perverse effect despite the airspace change leading to a reduction in aircraft movements. This led to extra engagement and increased project costs, despite no actual environmental impact, and the resulting assurance offered little meaningful benefit to stakeholders.

One respondent said that of approximately 35 ACPs completing screening, none required a full HRA because no impact on habitats could be identified.

One respondent said the cost of assessments can run from £15,000 for screening to £35,000+ for appropriate assessments, and £25,000 to £50,000 for full HRAs.

Environmental assessments for UAS/BVLOS

There were a small number of responses in relation to environmental assessments for UAS/BVLOS. One respondent said conventional environmental assessments are not appropriate for BVLOS, as these drones are quieter, lower⁽⁰⁸⁾ emission and less impactful

than crewed aircraft, yet require the same level of assessment. This creates unnecessary workload for both sponsors and regulators.

Responses related to UAS/BVLOS highlighted a disconnect between the environmental assessment requirements and the real-life effects of these operations. Applying frameworks designed for conventional aviation leads to unnecessary workload, activities and penalties. The result is a process that consumes time and resources while offering little meaningful assurance, so respondents broadly supported the need for a more proportionate, evidence-based approach that reflects the distinct characteristics of UAS operations.

Government response

In the absence of any conclusive evidence or data being provided, the government has noted the valuable feedback received from the consultation. Assessing the environmental impacts of an airspace change proposal remains a very important factor for government. We will consider whether it would be beneficial to develop guidance which supports a proportionate approach to non-aviation environmental assessments when they are applied to an airspace change, without weakening the important protections which these provide. This work will require engagement and coordination across government and with other organisations.

Noise Preferential Routes

NPRs are noise controls set through fixed flight paths designed to minimise noise over populated or noise sensitive area until aircraft reach a minimum altitude. NPRs determine the exact location of departure routes and were designed at a time when navigation was less precise. The government sets and owns NPRs at three designated airports - Heathrow, Gatwick and Stansted - although a number of other UK airports have adopted NPRs, either voluntarily or through planning agreements. These controls were put in place in the 1960s as a measure to manage noise impacts before other processes were available. Many of these controls have not been updated since the mid-1990s and are now outdated, both in terms of the population they cover and changes to aircraft technology. Some NPRs are difficult to adhere to and are arguably no longer performing the function they were created for.

To help assess track-keeping performance of airports, there is a 1.5km swathe to each side of the NPR line, creating a 3km wide “corridor”. These were intended to provide communities with assurance on where overflight aircraft could be expected to be seen or heard. Additionally, airports monitor track-keeping against their routes where there is a mechanism to determine aircraft which do not comply and deviate from the swathe, publish data for transparency and have a compliance rate.

In the consultation we proposed to modernise the mechanism for transparency and compliance with departure routes at the three designated airports. The government proposed to remove the existing NPRs at the three designated airports and to direct the CAA to guide airports to publish track-keeping information to ensure continued transparency to communities. (NPRs in place on a non-statutory voluntary basis, or as a result of a Section 106 agreement related to a planning application, would not be affected by this proposal.)

The consultation asked:

- Do you think that NPRs are an effective means of noise control, taking into account the modern navigational capacities of aircraft?
- Are you currently affected by an NPR at a designated airport? If so, do you have any comments on its effectiveness?
- Do you agree with our proposal to de-notify the NPRs? If not, please explain why.
- Do you agree that airports should be required to publish track-keeping information?

Summary of responses in favour

Among the respondents who answered the question on whether NPRs are an effective noise control measure (just under one third of all respondents), around half agreed that they are effective. Of those who indicated whether they are personally affected by an NPR at a designated airport, roughly one third reported a negative impact, around a quarter reported a positive impact, another quarter said they were not affected, and the remainder were unsure.

NPRs as effective noise controls

Several respondents said that NPRs act as a constraint on airspace because they are outdated, inflexible and poorly aligned with modern navigation capabilities. Respondents noted that NPRs were originally designed in the 1960s using legacy navigation technology and argued that aircraft now operate with far greater precision, meaning the original 3km swathes no longer reflect current performance of modern capabilities of aircraft. Some respondents described NPRs as an unnecessary regulatory hurdle and an outdated legacy that no longer serves its intended purpose. Others emphasised that NPRs were created for older navigation systems that required wide corridors and therefore do not meet the needs of PBN or contemporary route design.

A number of respondents also felt that NPRs are ineffective because the government has not kept them up to date or enforced them consistently. In addition, some argued that the rigidity of NPRs forces aircraft into narrow corridors, which can intensify noise exposure for communities underneath. Several respondents characterised this effect as creating concentrated “noise canyons” that emphasises local impacts.

The smaller group of respondents who said that NPRs should be abolished, mainly airports, airlines, and NATS, support removing NPRs because they believe NPRs duplicate the CAP1616 process, are outdated and no longer relevant, modern PBN based Standard Instrument Departures (SIDs) make NPRs redundant, and de-notification will improve flexibility and efficiency.

Track-keeping information

Most respondents want mandatory transparency and publication of track-keeping data, to increase transparency between airports and communities. For instance, they said that “track-keeping information supports transparency and helps maintain trust with local communities”, and “publishing noise and track-keeping information... has proved valuable

in building and maintaining better relations.” Additionally, responders say track-keeping supports analysis of non-compliance and root cause investigation and be identifying deviations to flight path design. Many respondents say data is needed to protect communities and prevent concentration so they can detect “noise sewers” and see whether routes are being used disproportionately.

One response said modern PBN makes track-keeping so accurate that publishing data adds little value: SIDs already show where 99% of flights will go. The only reason why flights would go out of track is due to Air Traffic Control intervention due to safety or weather, and track-keeping publication is an outdated requirement.

Respondents outlined a range of conditions under which they felt track-keeping requirements should apply. Many emphasised that noise sensitive areas should be protected from overflying, and that any complaints from residents should be anonymised and published alongside details of actions taken against pilots or operators who fail to comply. Several respondents called for a national, standardised system for collecting, publishing and auditing flight-tracking data, including measures to monitor poor adherence, off track events and the frequency of deviations. They also stressed the importance of making this data publicly available in a clear and accessible format, supported by effective enforcement mechanisms. A number of respondents argued that independent auditing or national oversight was needed, noting that airports may have conflicts of interest and therefore should not be solely responsible for self-reporting.

Summary of responses opposed

Respondents who agreed that NPRs are effective noise controls said that they provide certainty about where aircraft will be, and that removing them would lead to more vectoring and more dispersals, and new noise over new areas. Some say that they are seen as a protective measure for communities and that removing them would result in increased dispersal and more unpredictable noise exposure.

Responses which said that NPRs should not be removed (which included all template responses) said that NPRs are essential for community protection as they prevent uncontrolled vectoring below 4,000ft, limit noise exposure and allow residents/house buyers to have certainty of how much noise to expect. One main concern was that de-notification would lead to greater concentration of noise and flights. Some responses also expressed scepticism about relying solely on CAP1616 due to what they saw as a lack of transparency and limited community influence.

Many respondents accepted that NPRs need to change but did not support removing them outright. For example, they wanted NPRs to be narrower, aligned with PBN principles or stimulate dispersion around a SID or introduction of multiple flight paths and used to support noise sharing or respite. One response said that NPRs should be redesigned so that they pass between two settlements with a view to minimising overflying of such communities.

Government response

While many responses acknowledge that NPRs are outdated, having been designed in the 1970s for legacy navigation systems, and are now poorly aligned with modern systems, many respondents did not support removing them.

Across respondents there was strong support for mandatory publication of track-keeping data.

Overall, the evidence from respondents from the consultation shows that multiple NPRs are now out of date, although they remain valued by communities as a noise management tool.

The government recognises the importance of ensuring that communities are provided with information on where planes will fly above neighbourhoods and does not want to diminish this community transparency.

On balance, the government proposes de-notifying the NPRs at the three designated airports (Heathrow, Gatwick and Stansted) whilst emphasising the need for transparency of tracks flown. It remains a government priority to ensure the impact of aviation noise on communities is mitigated as much as possible, and that any change to use of airspace is consulted on with impacted stakeholders. De-notifying the existing NPRs at the three designated airports will not have any immediate impact because any change in airspace design (which determines where aircraft fly) would still need to go through the CAA's airspace change process, in which communities will be able to have input into the proposed changes.

While this proposal does not affect NPRs secured through non-statutory or Section 106 mechanisms, the government considers that similar issues of duplication, inflexibility and misalignment with modern airspace design may arise in those contexts. The government's policy is that the Airspace Design Priorities (and the CAP1616 process that applies them to airspace design) will provide the primary framework for managing noise directly attributable to airspace design and engaging communities. We note that any planning authority considering utilising NPRs should take care taken to avoid creating duplicate or overlapping mechanisms.

To ensure transparency to communities on aircraft performance and noise management, we are proposing to modernise the mechanism for transparency and compliance with departure routes at the three designated airports. The government will require the CAA to guide airports to make this information available to the public in a transparent and timely way. This will include consideration of whether the CAA can provide a common standard for reporting.

Consultation requirements

Consulting and engaging with those potentially affected by an airspace change remains an integral and essential part of the airspace change process. It provides an opportunity for all stakeholders to understand how they could be potentially affected, including providing valuable feedback. We want to provide a clear set of consultation principles to better support airspace change sponsors to conduct meaningful engagement best suited to their circumstances.

Specifically, the consultation asked:

- What, if any, are your views on the proposal to allow the use of organisations, such as local authorities, as a conduit for the consultation process on behalf of an airspace change sponsor?
- Do you agree or disagree with our proposed guidance on engaging and consulting with local communities and others affected by a potential airspace change?

Summary of responses in favour

There were a variety of views provided in response to the proposal to allow the use of organisations, such as local authorities, as a conduit for the consultation process on behalf of an airspace change sponsor. There were some responses which were completely in favour of the proposal. Some responses highlighted the importance of ensuring that any change does not impact the voices of individuals or be driven by political bias.

There were many conflicting views from individuals, councils and community organisations, some very much in favour and some very much opposed. Those in favour said that local authorities would be best placed to raise awareness and manage local input.

The responses were in broad agreement to the proposed guidance on engaging and consulting with those affected by ACPs. However, many responses caveated this with concern that all those affected would still be part of the consultation process, and that this should not diminish the role of other stakeholder organisations like consultative committees and community groups.

Some responses said clear guidance would be needed on how these consultations would be funded and resourced so as to not negatively impact local authorities.

Other comments included requesting that airspace change proposal consultations be written in clear and easy to understand language to enable people to express their views simply. Some responses highlighted that previous consultations have been overly technical and difficult to understand for those not working within the aviation industry.

Summary of responses opposed

Most responses provided to the proposal to allow the use of organisations, such as local authorities, as a conduit for the consultation process on behalf of an airspace change sponsor were opposed.

Some responses stated that the current guidance is sufficient in the obligation to consult with local authorities and that changes are not necessary. Many airports also stated they already carry out extensive engagement with their stakeholders and that established engagement systems are already in existence within these organisations. Some responses agreed with the need for local authorities to be involved in consultations, but that the administration of the consultations should be the airspace change sponsor. It should also be the airspace change sponsors responsibility to produce effective materials and engagement, rather than non-expert local authorities.

The responses from individuals, parish councils and community organisations opposed to the proposal stated that local authorities lack expertise, they do not have

resources and would potentially “disenfranchise” community groups focused on aviation and its impact.

A key concern was raised about funding and resourcing of this work as well as the risk for potential conflicts of interest, especially if local authorities are undergoing reorganisation.

Others, including some airports, raised the risk that this proposal would create delays and negatively impact the relationships between airports and local people rather than improve engagement. Respondents also wanted more detail on what the minimum level of engagement should be and what would be classified as best practice.

Government response

The government’s view is that consultation with those who might be affected is a critical part of the airspace change process. In light of the responses, we will not be pursuing the option to use third party organisations, such as local authorities, as a conduit for the consultation process on behalf of an airspace change sponsor.

Sponsors of airspace changes will still be required to engage effectively with local communities: however, the level of engagement will be determined by the CAA.

The government also notes comments about the complexity of information presented about airspace changes and will work with the CAA to see if further steps can be taken to make it more accessible.

Other comments and changes

Respondents also provided feedback on several live airspace changes underway, in particular at Gatwick Airport. Whilst this feedback is out of scope of the AND and ANG it was nevertheless useful to understand the views and sentiment of the local community towards an active airspace change.

These comments will be reviewed separately, and where appropriate discussions had with key airspace modernisation stakeholders as part of our day-to-day engagement with the aviation industry.

Air Navigation Directions

The AND is the mechanism through which the Secretary of State gives the CAA its air navigation functions. As part of the consultation, DfT published a draft updated AND alongside the draft ANG. There were very few specific comments about the AND and responses to the consultation questions focussed on areas covered by the ANG. This may be because the AND is of relevance to the CAA only, whilst the ANG is applicable to both the CAA and those involved in the airspace change process.

The CAA issued a formal response to our consultation which outlined its general support for our proposed changes to both the AND and ANG. This response provided the bulk of specific comments in relation to the AND, and these comments have been considered in finalising the AND.

The CAA's response stated that the changes would support delivery of a range of Airspace Modernisation activities, including on proposed changes to its CAP1616 airspace change process. The CAA welcomed the clear functions set out in draft directions, whilst also providing some suggestions on text amendments to ensure clarity and reduce the risk of ambiguity.

The CAA's response to our consultation can be found at the following link:
<https://www.caa.co.uk/cap3209>

6. Next steps

We have taken the wide range of information and feedback received to our consultation to further develop and refine our approach. An updated AND and ANG have been published alongside this consultation response document reflecting the changes outlined above. The government will keep these changes under review to ensure their effectiveness and that they are delivering the outcomes that are being sought.

Outside of the scope of the AND and ANG revisions, we will also commit to publishing revised guidance to the CAA on the call-in criteria for airspace changes, to assist the CAA determine whether a proposal for a permanent change to airspace meets one or more of the required criteria.

The publication of the AND and ANG will enable the CAA to propose changes to its own CAP1616 process, which is derived from the AND and ANG. We expect the CAA to finalise and publish its revised airspace change process shortly after the publication of the AND and ANG.

Annex A: Links to other relevant policies and documents

Airspace Modernisation Strategy (AMS)

Sets out the long-term framework for modernising UK airspace to deliver safety, capacity and environmental benefits.

[Airspace modernisation - GOV.UK](#)

CAP1616: Airspace Change Process

Defines the regulatory process for designing, assessing and approving airspace changes in the UK.

[CAP 1616 - Airspace Change Process](#)

Jet Zero Strategy

Sets out the UK government's approach to decarbonising aviation and achieving net zero emissions by 2050.

[Jet Zero strategy: delivering net zero aviation by 2050 - GOV.UK](#)

Environmental Principles Policy Statement

Provides a framework for considering environmental impacts in policymaking across government.

<https://www.gov.uk/government/publications/environmental-principles-policy-statement/environmental-principles-policy-statement>

Review of the Airports National Policy Statement (ANPS)

Sets out the government's ongoing review of the policy framework for Heathrow expansion, including stakeholder engagement and updated considerations.

<https://www.gov.uk/government/publications/engagement-during-the-airports-national-policy-statement-review>

Transport Act 2000

Provides the legislative framework for air navigation functions and powers.

<https://www.legislation.gov.uk/ukpga/2000/38/contents>

Part 1 - Aviation Night Noise Exposure Study

This study explores exposure to aviation noise at night can impact on physical and mental well-being.

[Aircraft Night Noise Effects Study](#)

Aviation Noise Attitudes Survey

This study provides evidence on attitudes to aviation noise around airports.

[Aviation Noise Attitudes Survey](#)

Annex B: Statistical breakdown of responses

While the consultation as a whole was highly informative, the analysis below concentrates on a subset of questions that highlight the most relevant findings.

Response Breakdown

Response type	Quantity of responses
Organisation	72
Individual	191*
Blanks	1
Total	264

Individual Response Type	Quantity of responses
Residents affected by aviation	24
Air passenger / resident affected by aviation	2
Environmentalism	1
Research in aviation innovation	1
Other	1
CAGNE	140
Blank	22
Total	191

*It is worth noting that there was a coordinated campaign by CAGNE with 140 identical responses. These have been included in the totals above but treated as a single result in the breakdown below to avoid distorting results.

Regional Breakdown

Area	Quantity of responses
London	16
Southeast	176
Southwest	3
East of England	2
Northwest	1
Yorkshire and the Humber	2
Scotland	4
Non-specified	60
TOTAL	264

Locations were aggregated into broader UK regions to simplify reporting and support meaningful comparison.

Airspace Design Priorities

Question 12 focused on whether respondents agree with priorities around 4,000ft. 12a asked 'do you agree or disagree that minimising noise impacts should be prioritised below 4,000ft?' 12b asked 'do you agree or disagree that efficiency (minimising carbon on a per flight basis) should be prioritised at 4,000ft and above?'

	12a Individuals	12a Organisations	12b Individuals	12b Organisations
Agree	11	39	0	23
Disagree	17	12	31	32
Don't know	1	0	2	1
Blank	22	21	16	16
Total	123*		121*	

*Not all respondents to the consultation responded to questions 12a and 12b.

Out of the 76 respondents that answered 'agree' or 'disagree' to both 12a and 12b, the results have been highlighted in the table below:

		12b	
		Agree	Disagree
12a	Agree	22	27
	Disagree	2	25

Agree 12a / Agree 12b: 22 respondents support prioritising noise minimisation below 4,000ft and efficiency at or above 4,000ft

Agree 12a / Disagree 12b: 27 respondents support prioritising noise minimisation below 4,000ft but do not support prioritising efficiency at higher altitudes

Disagree 12a / Agree 12b: 2 respondents support prioritising efficiency at or above 4,000ft, but not noise minimisation below 4,000ft

Disagree 12a / Disagree 12b: 25 respondents do not support prioritising either of these.

Annex C: Glossary of terms

ACP (Airspace Change Proposal)

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

AMS (Airspace Modernisation Strategy)

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

AND (Air Navigation Directions)

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

ANG (Air Navigation Guidance)

Guidance issued by the Department for Transport to the CAA on how to exercise air navigation functions.

ANAS (Aviation Noise Attitudes Survey)

A government survey measuring public attitudes to daytime aviation noise.

ANNE (Aircraft Night Noise Effects Study)

A two-part study examining the impacts of aircraft noise at night, including sleep disturbance.

ANPS (Airports National Policy Statement)

The government policy framework for nationally significant airport infrastructure in England.

ATMs (Air Traffic Movements)

All landings and take-offs by aircraft engaged in the commercial transport of passengers, cargo, or mail.

BVLOS (Beyond Visual Line of Sight)

Drone operations conducted beyond the operator's direct visual sight.

CAA (Civil Aviation Authority)

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

CAP1616

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

CAP725

The CAA's previous regulatory process governing ACPs.

CO₂ (Carbon Dioxide)

A greenhouse gas emitted by aircraft, contributing to climate change.

DfT (Department for Transport)

The UK government department that leads on UK aviation and the author of the ANG.

Defra (Department for Environment, Food and Rural Affairs)

The UK government department responsible for environmental protection.

Free Route Airspace

An air traffic management system that removes fixed, predefined airway networks, allowing pilots to fly a direct, optimal path between defined entry and exit points.

HRA (Habitats Regulations Assessment)

A legal process assessing impacts of plans/projects on protected ecological sites.

L_{Aeq} (Level A-weighted Equivalent Continuous Sound Level)

A metric representing average noise exposure over a specified period.

L_{den} (Day-Evening-Night Level)

A 24-hour annual average noise metric.

L_{night} (Night-time Level)

The average noise exposure measured only at night (usually 23:00 PM to 7:00 AM)

LOAEL (Lowest Observed Adverse Effect Level)

The lowest level of noise exposure at which adverse effects begin to occur.

NATS

The UK's main air navigation service provider.

NPSE (Noise Policy Statement for England)

The government policy setting out principles for managing noise impacts.

NPR (Noise Preferential Route)

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

PBN (Performance Based Navigation)

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

SEA (Strategic Environmental Assessment)

A statutory process assessing environmental effects of plans and programmes.

SIDs (Standard Instrument Departures)

A standardised route for aircraft departing from an airport.

SoNA (Survey of Noise Attitudes)

A previous UK survey on public attitudes to aviation noise (2014).

SNCBs (Statutory Nature Conservation Bodies)

Public bodies responsible for advising on nature conservation (e.g. Natural England).

TMA (Terminal Manoeuvring Area)

Controlled airspace surrounding major airports where aircraft climb, descend, and manoeuvre.

UAS (Uncrewed Aircraft System)

Also known as Unmanned Aircraft System, this term is being adopted by government. It is commonly known as a drone or Remotely Piloted Aircraft Systems, an aircraft system without a pilot on board which is controlled and operated from a remote location.

UKADS (UK Airspace Design Service)

A service provided by NERL to propose, design and deliver a holistic and modernised UK airspace.

Vectoring

The process by which an air traffic controller directs a flight to steer a particular route, rather than the plane following the set flightpath. It is used, for example, to safely separate aircraft in congested airspace.