

**From:** Sue Mitchell  
**To:** [Airspace Modernisation](#)  
**Subject:** [External] CAA's two consultations regarding airspace change, both closing on 12 January, 2025  
**Date:** 12 January 2026 11:55:33

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## **1. CAA consultation: Airspace modernisation: Consultation on draft guidance for the UK Airspace Design and Coordination Services**

**Closing date: 12/01/2026**

<https://consultations.caa.co.uk/policydevelopment/draft-ukads-ukacs-guidance/>

My responses to the questions asked are as follows:-

1. This question raises major concerns that this process appears to seek to make airspace change predominantly beneficial for aviation, to the detriment of communities who suffer, or could suffer, new aircraft noise or an increase thereof. Any suggestion of saving CO2 has been dismissed due to the desire for growth.

The phrase 'stakeholder input' suggests vested interest (DfT and CAA) in progressing airspace change as quickly and as profitably as possible, whilst not seeking to provide a balanced approach to those on the ground or the planet.

'Milestone' suggests monitoring, with little rigorous action to stop any impact found to be suffered on the ground. Milestones should have clauses whereby they can be 'called in' and stopped.

'Dependencies' is another word for 'needs'. We believe it is seeking to obscure the concerns and impacts of airspace change from those on the ground.

'Transparency' is a good quality to have in a government-associated document but not if the stakeholders are purely those with a vested interest, as seemingly proposed under the wording 'stakeholders' throughout this document. Transparency should not just be 'informing' but should allow for 'challenge'.

2. 'Stakeholders' seem to be only those with a vested interest in benefiting from the process (aviation/ government/ CAA), while residents are totally at the mercy of a weakened CAP1616; the public engagement being held at such a late stage at the end of the process allows little, if any, effective time for objections and feedback.

'Differentiation: Ensure the engagement plan clearly distinguishes its purpose from CAP 1616 consultations to avoid confusion.'

The lack of input into this process by the public will create a lack of trust in the process, especially CAP1616 that has been weakened to favour aviation profits, and increased speed

of airspace changes, without due diligence to those on the ground. It does not seem to allow for any meaningful call-in, but proposes more monitoring conducted by those that seek to profit from airspace change.

3. 'Stakeholders' – again, these seem to be purely those that seek to profit from airspace change, while not including those who will potentially suffer, with no compensation from the impact of airspace changes (DfT guidance to ministers for loss of house value). This process seems to be advancing from 'marking their own homework' to 'dictatorship' in seeking to speed through airspace change that will have serious ramifications for those on the ground.

'Escalation procedures for unresolved issues' – again, we raise concern that this only refers to those bodies with aviation vested interests, e.g. if two airports want maximum capacity in set airspace due to the currently proposed stakeholders. Also, there is not at present any reasonable recall for residents impacted in this or CAP1616 (with proposed changes).

4. 'Accountability' again refers to aviation interests and not those of residents on the ground. This must be challenged as aviation should be accountable to residents i.e. those impacted and not government bodies that are behind these consultations and policies with vested interests that have the appearance of being allowed to outweigh voters' rights.

'Address risks' - What is currently proposed seeks, in our opinion, to want to push through airspace change as fast as possible, benefiting aviation as much as possible, with few (if any) benefits for the planet, or residents on the ground who already suffer unacceptable levels of health impacts from airport operations, both day and night (at Gatwick).

'Programme Board' would seem to be the same as 'stakeholders'; this should include representatives of those impacted, e.g. residents and the planet. The DfT ANEG forum has become a closed shop, with only a select few allowed to attend, some of whom seek to represent themselves and have no constituents for whom they speak.

5. 'Strategic objectives' - These would seem to be sound criteria, except that the objectives appear to have been set by those with a vested interest in profiting from airspace change, without providing a balanced approach.

'Do not create unnecessary barriers or conflicts' - It is presumed this refers to potential resident challenges or legal challenges to the process. This suggests airspace change should be pushed through to benefit aviation over community impacts and environmental concerns. We therefore believe this needs to be reworked to embrace and encourage engagement.

- I strongly suggest that policy and criteria need to reflect:
  - Meaningful engagement with all parties, and not just aviation as proposed.
  - Transparency, that allows for feedback from all parties and not just aviation.

- Independent body that can oversee the process, with input on behalf of those on the ground and the planet (UKADS is not seen as independent or fully engaging, as it is, to date, aviation-led)
- Call-in allowed for all, offering opportunities to challenge throughout the process, including design stages, by NATS and the airport's desires for airspace change; CAP1616 is proposed to be weakened further and actively prevents input from communities.
- NATS must be accountable for any proposals submitted for airspace change, along with the CAA/ UKADS.
- All meetings must be open to the public and not conducted 'behind closed doors'.

## **2. CAA consultation: Airspace modernisation: Consultation on the requirements**

### **for a UK Airspace Coordination Service and associated guidance**

**Closing date: 12/01/2026** <https://consultations.caa.co.uk/policy-development/draft-ukacsrequirements/>

My responses to the questions asked are as follows:-

1. I am not sure what lessons have been learned, because the CAA continues to produce complex documents for consultation leaving most of the public unable to participate effectively.
2. 'The masterplan and PEX have been deemed to cause confusion and frustration, due to their lack of detailed information at early stages. Instead, public consultations will be conducted later in the process by airspace change sponsors under the CAP 1616 process.'

I question how this can be party to CAP1616 airspace change when the Gatwick masterplan was predominantly about new runways. We do not believe that the 'airport desires' for the future can be included in CAP1616 that purely relates to airspace change. The concerns brought by the Gatwick masterplan was the plan for a 3-runway airport and the blight it would, and did, cause. The frustration related to how an airport could submit such plans when aviation is increasing global warming and emissions need to reduce.

3. 'Agile' - active response is to be welcomed if it is in a balanced-approach fashion, with transparency and engagement throughout with all parties and not just aviation.

'Monitoring' - is a concern if not acted upon when issues are found.

'Cluster requiring coordination' - we accept that two bodies need to actively work together, but not if it is to the detriment of the residents on the ground or the planet, with increases in noise and emissions.

I again question how 'coordination process will be streamlined to align better with the CAP 1616 process' without community engagement at an earlier stage of CAP1616.

CAGNE does not support the removal of SEA regulations, as these cover noise impacts and CO2. This needs to be included in all aspects of the process to allow for a balanced approach. The environmental impact is not something to be 'bolted on at the end', as put forward.

The removal of the PEX will reduce opportunities for early public input, so is not welcomed.

The removal of the masterplan and associated documentation may impact the availability of detailed information for stakeholders; this needs to be addressed, perhaps in a different format such as included in a decarbonising plan (decade of change) whereby environmental impacts can be seen alongside, in detail. We do not see this as part of CAP1616, unless it is specifically about airspace change, as with the Gatwick masterplan for growth from the main runway (Gatwick Master Plan 2018).

Regards, Sue Mitchell

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