

Submitted by email to AirspaceModernisation@dft.gov.uk 30 January 2026

To the DfT Airspace Modernisation Team

**Response by HSPG to the 2025 consultation on revision of the Aviation
Navigation Guidance and Directive**

Thank you for agreeing the extension for us to submit a response by email by 1st February 2026, this has allowed for this response to be discussed and agreed by our Environment and Airspace Group meeting of 28/1/26. The response is formatted to answer the consultation questions.

This response is made by **the Heathrow Strategic Planning Group (HSPG)**, a constituted grouping of 'willing' local authorities¹ committed to delivering sustainable growth across the functional economic area surrounding Heathrow Airport.

The Group was formed in late 2015. It is independent of, but constructively engages with, Heathrow Airport Ltd (HAL). The Group collaborates on interventions that could improve the area around the airport and acts as a conduit between the members and Heathrow Airport Limited, regional and national Government, and other key stakeholders.

This response has been prepared by the partnership's Secretariat with engagement with our technical Local Authority officer working groups.

<https://www.heathrowstrategicplanninggroup.com/>

Strategic Prioritization Questions

Q1. Do you agree or disagree with the approach set out in paragraphs above from the consultation document about how this guidance might apply to airspace change proposals (ACPs) that are already underway? If you disagree, please explain why.

DISAGREE. Underpinning the move from Altitude Based Priorities to an Airspace Design Priorities approach is the assumption that the land use planning (Planning) decisions

¹ London Borough of Ealing, London Borough of Hounslow, Runnymede Borough Council, Slough Borough Council, Spelthorne Borough Council, Surrey County Council, Royal Borough of Windsor & Maidenhead.

Other organisations have 'Observer' status and participate in some activities, including: various Government agencies, National Highways and the West London Alliance (of London Boroughs) and London Borough of Hillingdon. The Group works closely with Heathrow and airport stakeholder groups such as Council for Independent Scrutiny of Heathrow Airport and Heathrow Area Transport Forum.

determine the number of air traffic movements (ATM), and then airspace processes determine the flight routes these are two distinct regulatory regimes.

However, the land use Planning decision will be based on balancing environmental, economic and other impacts – including an environmental assessment that must include assessment of the impact of flights on overflow communities, which can only be identified by assuming ‘indicative’ flightpaths and traffic information. To better integrate processes / regimes – the ACP process should to a greater degree be progressed in parallel to and inform the Planning process – it cannot simply follow it and facilitate the Planning decision.

This interaction and resolving the ‘chicken and egg’ nature of the relationship must be more clearly addressed in the AND / ANG.

Furthermore, and in relation to our response to Questions 3 & 4, the HSPG have a major concern that expansion of London airports capacity (and potential air traffic movements) is now committed by recent TCPA and DCO Planning decisions (including the ANPS Policy for Heathrow) – therefore airspace remains the only form of regulation available to improve noise impacts on the overflow. The proposed removal of concern for noise between 4,000 and 7,000ft is therefore strongly resisted. (Qs. 3, 4 & 5)

The ANG should set out clearly the vital engagement of airspace design with the roles and responsibilities of local authorities including for land use planning, environment, health and wellbeing, surface transport and economic growth.

A key element of this will be the environmental assessment processes which are in turn changing in the emerging legislation being introduced at a similar time to the AND and ANG. Clearer cognisance of this assessment process should be demonstrated.

Q 2. What, if any, other issues in relation to the migration to the new process do you think we should consider?

A ‘one size fits all’ prescriptive approach to the migration will not be practical. For example, in complex airspace with interrelated ACP schemes, such as at Heathrow Airport, where several ‘live’ or ‘future’ interlinked ACP schemes may be proceeding with a mixture of approaches using both 2017 and 2026 regimes, and the need to coordinate with other Airports ACPs in the London TMA.

For Heathrow’s previous draft 3Runway DCO (2019), a draft Noise Envelope and all environmental assessments were prepared using ‘indicative’ flightpaths and operational assumptions prepared on the basis of the 2017 ANG. Such a fundamental change to new 2026 ANG based policies would change their outcomes.

Heathrow have also prepared a 2Runway ACP for airspace modernisation (approaching Stage 3 subject to UKADS) that includes full easterly alternation using Runway 09L by around 2028. The environmental assessment assumptions and inputs relied on 2017 ANG based indicative flightpaths and operations.

In advance of progress with this 2R ACP, it now appears likely Heathrow may use a CAP1617 Planned and Permanent Redistribution (PPR) ACP for the full easterly alternation elements – presumably work to date on this has assumed 2017 ANG.

For the new 3R expansion DCO, Heathrow are seeking to ‘dust off’ the previous 2019 DCO scheme to achieve the required program, again picking up the earlier ACP preparation work based on 2017 ANG. This work underpinned the environmental assessments used in

Environmental Scoping including the Environmental Scoping Amendments agreed by PINS in late 2025.

However, the new 3R ACP will now need to integrate with (indeed it reportedly dictates much of) the London TMA airspace modernisation to be led by UKADS, who emphasise consistency and will be using the 2026 ANG.

This running of several ACPs in the same time and space based on different regimes is confusing enough, but critically, the 'indicative' flightpaths and operational patterns from these also underpin the environmental assessments used in the TCPA and DCO decisions.

In short, despite the short-term delay, it may quicker in the long run and much clearer for all to restart all the ACP work again based on a 2026 regime for common standards and principles.

Also see our comments below in relation to changes in the Environmental Impact Assessment regime for DCOs and TCPAs following the Planning and Infrastructure Act (SI awaited) and environmental regulations

Q3. Do you agree or disagree 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?

DISAGREE. While we agree that providing greater clarity and focus on realistic options only is useful, we do not agree with the removal of noise consideration above 4000ft.

Much of the wider London conurbation is overflown by aircraft at 4000-7000ft, these aircraft do have measurable noise impacts on health and wellbeing and noise impact considerations should not be ignored in the design of airspace and operations. For example, managing flight path alternation and the interaction of several airports will all be valuable in improving environmental conditions on the ground.

Furthermore, within the London TMA historic and recent Planning decisions (including City Airport, Luton, Gatwick and Stansted expansions, together with the ANPS commitment to Heathrow expansion) mean there is no longer opportunity to manage the overall level of environmental impacts through Planning decisions of the number of ATM – the only tool remaining to better manage the impact of air noise is airspace design.

Q4. Do you agree or disagree 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?

DISAGREE – inadequate – see further responses at Q1 and Q3..

Insufficient information is given and with the current metrics it will be difficult to objectively model the trade-off of priorities. If efficiency is calculated on a final destination basis, the value of carbon savings in variations between 4,000 and 7,000ft at the local end of the trip is likely to be very small.

Likewise, too little information is given on the assessment of the intensity and spread of noise impact for different options of flight heights and aircraft configurations between 4,000 and 7,000ft. The basis for removing noise impact consideration at 4,000ft is not given nor justified.

Minimising noise impact should be the priority (after safety) below 7,000ft.

Q 5. Do you think the altitude where these priorities changes 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.

See Q4 – priority should shift at 7,000ft AGL. Much of the London conurbation is impacted by aircraft noise at 4,000 - 7,000ft. The HSPG have a major concern that expansion of London airports capacity (and potential air traffic movements) is now committed by recent TCPA and DCO Planning decisions (including the ANPS Policy for Heathrow) – therefore airspace remains the only form of regulation available to improve noise impacts on the overflow. The proposed removal of concern for noise between 4,000 and 7,000ft is therefore strongly resisted. (Qs. 3,4 & 5). Currently, airport noise modelling does not take account of in combination significant effects.

Q 6. What, if any, other factors do you think should be considered as part of the strategic priorities and why?

Given the anticipated role-out of Advanced Air Mobility there is likely to be greatly increased air traffic movements at heights below 4,000ft and the ANG / AND should address this as a strategic priority.

While new types of eVTOL aircraft may be ‘less noisy’ than conventional aircraft the noise character and flight behaviour will be very different. At low levels noise at surface level should remain the key factor in design (after safety) but other important non-acoustic impacts on over-flown populations will increasingly come to the fore and need to be factored into the ANG if it is to offer a for a more nuanced approach capable of providing some guidance and discrimination to the design of flight paths and operations below 4,000ft.

The interaction of flightpaths with land use Planning decision and management of open spaces, environmentally sensitive areas and urban public spaces will occur more often with new proposals and become increasing tested.

As a strategic priority there should be a requirement for greater engagement between local authorities, aerodrome operators and airspace designers and further guidance offered for design below 4000ft AGL.

Environmental Assessment Requirement Questions

Question 7

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

No but Local Authorities are specifically required to respond to and assess Planning proposals related to changes in aviation. These require the production of Local Impact Reports by LPAs as part of environmental assessment for TCPA and DCO in relation to airport an airspace change.

Question 8

What was your experience of the specific environmental assessment?

Extensive engagement on behalf of our member Local Authorities when Heathrow has sponsored an airspace change or promoted a Planning proposal for expansion, growth or change in runway operations.

Question 9

What, if anything, were the costs and benefits of doing the specific environmental assessment?

Is this a call for evidence or consultation on draft guidance?

Question 10

In carrying out the specific environmental assessment was sufficient guidance available?

Is this a call for evidence or consultation on draft guidance?

Question 11

Overall was the guidance helpful or not? Please explain why.

Is this a call for evidence or consultation on draft guidance?

Question 12

Would, in your view, further guidance in relation to how such requirements might be applied to airspace change be helpful?

YES - TCPAs will most likely be required for many new vertiports or introduction of commercial eVTOL operations onto part of an existing licensed and unlicensed airfield in future (proposals from CAA 2025).

The assessments necessary to the TCPA decisions in relation to the permitted number of flights, hours of operation, types of aircraft and operation, and preferred NPR / circuits and flightpaths or areas to avoidance etc, will all require some measure of indicative airspace planning work in order to inform the environmental assessments necessary for the TCPA.

Clearer guidance as to what information should be available will be very helpful.

AC Question 13

In your view what content should the further guidance include?

See Q. 12

Noise Preferential Routes

Question 14

Do you think that NPRs are an effective measure of noise control, taking into account the modern navigational capacities of aircraft? If not please explain why.

There is scope to replace NPRs with new innovations. However, NPRs have value.

NPRs are an effective control mechanism, and provide some 'certainty' or reassurance to interested parties on the ground. However they are 'fixed' and generally the current ANG discourages change to overflying new areas, so NPR's can restrict innovation and the design of new routes by constraining future changes benefiting from up-to-date navigation systems such as PBN.

NPRs provide useful description of activity but a simple requirement to fly randomly anywhere within a 3km NPR corridor can readily be improved upon with new navigation capacities – offering potential relief on the ground by requirement for aircraft to fly with tighter control to a track, and then operations to provide planned alternation between several distinct tracks within that NPR departure or approach route to provide some relief on the ground.

In uncontrolled airspace – it is more worthwhile to identify areas to be avoided by overflight (urban concentrations and noise sensitive areas) in approach and departure at airfields / vertiports, and allow a freer route selection by the aircraft.

Question 15

Are you currently affected by an NPR at a designated airport? If so, does it have a positive or negative effect?

HSPG members are impacted by Govt notified NPRs – there is no evidence of alternative at present.

Question 16

What comments, if any, do you have about the effectiveness of the existing NPR?

NPRs are an important noise control measure originally based on the standard instrument departures at the designated airports. They are intended to provide communities with information and assurance on and where overflight aircraft can be expected to be seen or heard. A number of other UK airports have adopted NPRs, either voluntarily or through planning agreements.

It could be argued that they are outdated however if they are replaced it should be with control measures to best manage noise impacts at altitudes below 7,000ft. Being outdated is not the same as ineffective.

Question 17

Do you agree or disagree with our proposal to de-notify the NPRs? Please explain your reasoning for your response.

Any change in NPRs is likely to benefit some receptors and be detrimental to others. Communities as a whole should be able to rely on the fact that noise exposure will not get worse as a result of any changes.

De-notification would transfer the scrutiny of the NPRs to UKADS, distancing it from public accountability / visibility and Ministerial responsibility in the designated airports. The future overall governance arrangements of UKADS are as yet uncertain and concern has been voiced about its governance by HSPG and others. This shift could be considered a democratic detriment without improvements to the governance proposals for UKADS.

Question 18

Do you agree or disagree that airports should be required to publish track-keeping information? Please explain your reasoning for your response and if you feel there should be additional conditions.

Yes – quality of information improving at Heathrow. However, concern for greater transparency to local communities about the consequences of poor performance, that fines are directed to mitigate and compensate impacts, and ensure meaningful consequences for the infringing airlines.

However, the demand for track information should be proportionate to the scale of air traffic activity.

Engagement and Call In

Question 23

Conceptually do you agree or disagree that the Secretary of State should retain the ability to 'call in' an airspace change? If you disagree, please explain why.

AGREE - commensurate with 'call-in' powers for TCPA and DCO

Question 24

Do you agree or disagree with the criteria proposed for the Secretary of State to call in an airspace change?

AGREE

Airspace Design Question**Question 27**

Do you agree or disagree with our proposal to provide greater flexibility to the CAA and airspace change sponsors on how to best consider locally appropriate flight designs which offer respite? Please explain the reasoning for your response.

AGREE - locally appropriate solutions will only be found through engagement with LAs, local stakeholders and communities.

Consultation Process and use of 3rd parties**Question 28**

What, if any, are your views on the proposal to allow the use organisations, such as local authorities, as a conduit for the consultation process on behalf of an airspace change sponsor?

The 2018 Consultation Principles referred to in the ANG are noted – however these are generic and do not offer much assistance in designing meaningful and relatable consultation about airspace proposals that have unique characteristics. Airspace impacts may range from having regional scale impacts of multiple interacting airports in say the London TMA, to highly localised impacts of a single approach path / departure route to a smaller airport or even vertiport.

We welcome the continued recognition of the need for engagement with local authorities during the airspace change process. We support the aim for better engagement, which must include effective early-stage engagement.

However, there is very little detail around the proposal for local authorities to act as a conduit in the consultation process and we wish to raise a number of queries and concerns:

- Individuals impacted by the changes must still be able to input in their own right, given the diversity of views that may be expressed across a local authority area.
- Local authorities will not be able provide a detailed coordinated/consolidated summary response to proposals which adequately summarises local views as impacts may be felt differently across their area. It is important that the full variety of views can be submitted and appropriately considered by the sponsor.
- It is unclear what role local authorities are expected to play. For example, is it helping to promote and make sure that communities are aware of consultations, collating responses or something else?
- If the expectation is for more than simply assisting in raising awareness of consultations, there are a number of serious limitations to consider including the

availability and funding of staff to resource as well as the likely lack of technical knowledge to deal with technical queries.

However, this is not without some costs and the implications of a 'new burdens doctrine' impact to LAs should be quantified.

Finally, HSPG do act as a 'conduit' between Heathrow and the many neighbouring local authorities impact by one airport – in our view this is a mutually beneficial and efficient arrangement for all parties. LAs (or other collective groups of LAs) could usefully offer such a role elsewhere

Question 29

Do you agree or disagree with our proposed guidance on engaging and consulting with local communities and others affected by a potential airspace change? Please explain the reasoning for your response and if you feel there should be additional conditions.

The guidance is extremely thin and requires expansion and inclusion of best practice and other support. Some changes lack detail, for example noise metrics. We also wish to highlight the importance of the Fair and Equitable Distribution (FED) report and ask that there is an objective of embedding the FED Framework into regulation, encouraging earlier community engagement to take place.

Further opportunities for change Questions

Question 32

What types of training, legal review, internal policy updates or internal processes do you anticipate needing to implement as a result of the revised AND and ANG?

The consultation overlooks that the responding stakeholders to airspace proposals also need to upskill to handle the changes too!

Question 43

What, if any, unintended consequences—positive or negative— do you foresee from the implementation of the revised guidance?

The changes offer potential to greater enable innovation and overcome the inertia in the present policies and systems that 'minimise change' and slow and discourage beneficial change of 'fairer' redistribution of flight paths.

However, the changes appear to bring a lack of transparency and a reduction in stakeholder engagement and consultation. Governance is in doubt.

If communities are further disenfranchised this will result in further / wider dissatisfaction and detrimental impact on wellbeing and health of communities impacted by air noise.

Also see response to Q1 and Q2

Question 44

What, if any, other general comments do you wish to share?

As well as the AND/ANG there are extensive concurrent and interrelated changes being made to Planning and Infrastructure legislation and processes, simplification of environmental assessment requirements, as well as the CAA / DfT airspace modernisation and introduction of UKADS. Major expansion is being progressed at Heathrow and other London airports on ambitious timescales. This all needs to be kept in concert to achieve clear priority objectives, ensure deliverability, and respect GHG and other limitations.

In our view, a much clearer timeline and description of inter-relationships is required and more should have been done in the AND/ANG to explain this and ensure clarity, transparency, democratic oversight and good governance.

As an example, both the Aviation Policy Framework and the role of environmental assessment is missing from the essential relationships outlined in the figure (from CAP3156 explanatory document) below and therefore consideration of amendments to ANG/AND. Can these dimensions be added?

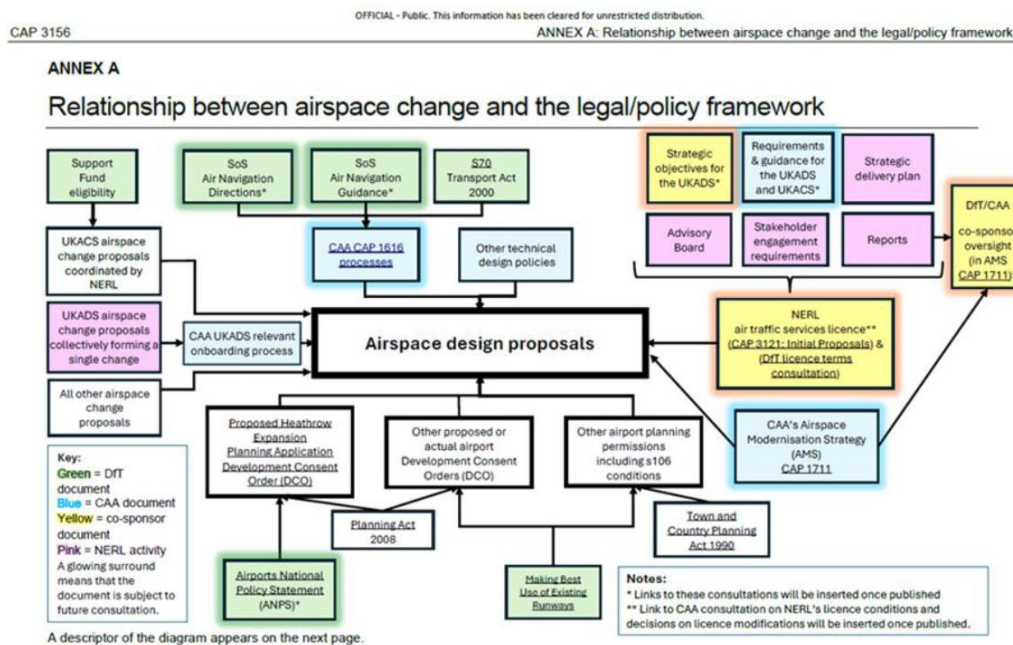


Figure A1: Envisaged inter-relationship between airspace change and the legal and policy framework

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