



Airspace Change Organising Group

ANNUAL REPORT 2024 / 2025

Transforming the UK's airspace design to deliver the objectives of airspace modernisation.

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Chairman's Statement



If it were needed, this report serves as a comprehensive reminder of the success ACOG have delivered over the period in continuing to coordinate and facilitate a highly complex national infrastructure modernisation programme, amidst a less than stable operating framework within which a very diverse stakeholder population, often with competing interests, operates. I commend the ACOG team for their expertise, diligence and success, often decisive, yet equally often unsung and well beyond the roving eyes of casual observers.

The ACOG Steering Committee have highlighted previously the structural uncertainty and risk to the FASI programme that the current funding model for airport ACP sponsors drives. It is therefore very welcome news that the impending implementation of the UK Airspace Design Service (UKADS) initiative will be accompanied by a reliable funding stream, not just for the major airports congregated in the South-East of the country but extending too, albeit under an adapted model, to the rest of the airport sponsors falling under the umbrella of the FASI programme. The benefit of enhanced stability this will bestow on the wider programme cannot be overestimated - there will undoubtedly continue to be technical and other challenges to be addressed, but ACOG's experience, coupled with their hard-earned reputation for objectivity, impartiality and effectiveness, will hopefully continue to provide a secure anchor in any turbulence.

ACOG's value over the period has undoubtedly been magnified by the Group's decision, encouraged by the Steering Committee, to unilaterally step outside the confines of their planning and coordination brief and step in, deliberately and necessarily, to the delivery space at local and regional levels. This was done to restore performance, team with and coach struggling ACP sponsors and, often under acute time pressures, fill technical capability gaps. This broadening of ACOG's role, enabled and amplified by the efforts of an array of key stakeholders working collaboratively for the greater good, retired some significant issues and risks to the Scottish TMA's progress and reestablished that cluster on a vector for success. In addition, the lessons learned from the restorative actions in Scotland and ACOG's deeper participation in programme delivery have been exported to the remaining non-LTMA clusters, prompting a measurably stronger and more assured start to their modernisation activity.

Although the genesis of the aforementioned UKADS was before the period of this report, the implementation timing and scope of the entity is as yet uncertain in other than concept and that is unhelpful. During the interregnum, ACOG have striven to crystallise relevant work already undertaken in the LTMA cluster as best we can, but the machinery of transformation is grinding through its gears only slowly. Whilst the effect is most acute in the LTMA, where substantive work has all but ceased, there nevertheless are unwelcome reverberations more widely as a mechanism for and the timing of accessing support funding has not yet been articulated, the nature of any revisions to the CAP1616 airspace change procedure and their applicability or otherwise to 'legacy' ACPs already well-advanced is unclear, and the hiatus in the South-East risks contagion and sapping momentum in the rest of the programme. As it stands, despite the considerable challenges encountered along the way, in Scotland and the Midlands we are on the cusp of either delivering the first substantive terminal and upper airspace modernisation with all its material benefits in the near term, or seeing it recede into the distance of the middle of the next decade as any delay now will inevitably create a conflict with delivery of the increasingly complex LTMA element, once that cluster's design is defined, and other priorities. As a nation, we must surely not let this valuable opportunity slip through our fingers.

Sir Timo Anderson

KCB DSO
Chair, ACOG Steering Committee

Head of ACOG's Statement



As Head of ACOG, I am proud to present this Annual Report for 2024/25—a year that has tested, strengthened, and ultimately reaffirmed the value of our mission: to deliver a coherent, credible, and nationally coordinated transformation of UK airspace.

This year more than ever, ACOG has demonstrated its ability to lead and deliver under pressure. We've made significant progress across all regional clusters, from guiding the Scottish Cluster to the brink of public consultation, to stabilising delivery in the West and Northern England amid sponsor withdrawals and funding challenges. Our direct support to Edinburgh Airport—delivered with urgency, technical rigour, and cross-sponsor collaboration—epitomises the

kind of agile, hands-on coordination that defines ACOG's role.

We have also deepened our analytical and governance capabilities, embedding new tools and frameworks that enhance transparency, optimise design decisions, and strengthen regulatory readiness. Our Cumulative Assessment Framework, Digital Visual Repository, and Sandbox Environmental Dataset are now central to how we assess trade-offs, communicate impacts, and support sponsors through the CAP1616 process.

The Government's announcement of the UK Airspace Design Service (UKADS) marks a pivotal moment for the Southeast cluster. While this transition evolves, ACOG remains focused on maintaining delivery momentum across the rest of the UK. Our remit may be adapting, but our purpose endures: to ensure that airspace modernisation is delivered as a truly national programme, not just a regional one.

I want to thank the ACOG team—whose professionalism, resilience, and commitment to public value under testing circumstances have made this year's progress possible.

We look ahead to 2025/26 with clarity of purpose and confidence in our ability to play our part in delivering a coordinated national programme over the coming years.

Mark Swan

Head of the Airspace Change Organising Group

1. Introduction

1.1. Overview of Airspace Modernisation

1. Aviation continues to play a vital role in connecting people, driving economic growth, and supporting the UK's ambitions for a modern, sustainable transport system. Access to the UK's airspace is essential for all forms of aviation, whether it's commercial airlines transporting passengers and cargo, the military maintaining our national security, or emerging sectors such as drones and air taxis introducing new services and business models. Yet despite this growing and increasingly diverse demand, the underlying design of the airspace remains outdated. It was built for a different era of aviation and has not evolved in step with advances in aircraft technology, shifts in how airspace is used, or the increasing need for efficiency, resilience, and environmental performance.
2. Airspace modernisation is therefore not optional, it is a national infrastructure priority. The UK's Airspace Modernisation programme, co-sponsored by the Department for Transport (DfT) and the Civil Aviation Authority (CAA), is a coordinated national initiative to upgrade the full system of airspace design, flight paths, and operational procedures. Its goal is to deliver a more efficient, flexible, and environmentally sustainable airspace system that can meet the needs of today's aviation sector, while preparing for the technologies, aircraft types, and service models of the future.
3. The CAA's Airspace Modernisation Strategy (AMS), now expanded through the release of Part 3, the Deployment Plan, sets out a more detailed and time-bound framework for implementation. It links the strategic vision of Parts 1 and 2 to specific deliverables over a rolling seven-year period and provides greater clarity on the role of delivery entities like ACOG and the newly proposed UK Airspace Design Service (UKADS). Critically, AMS Part 3 formally recognises the UK Airspace Change Masterplan, and the constituent Airspace Change Proposals (ACPs), as essential components of the Terminal Airspace element of the strategy. These ACPs represent the backbone of modernisation in the UK's busiest and most complex airspace, and the Masterplan establishes their interdependencies, prioritisation, and expected contribution to the overarching transformation of the UK airspace system.
4. The proposed establishment of UKADS marks a pivotal shift in how system-wide, terminal airspace redesign is delivered in the London and Southeast region – home to some of the world's most complex and interdependent airspace. However, this development also underscores the importance of maintaining delivery momentum in other regions of the UK. In Northern England and Scotland, where Iteration 3 of the Masterplan is progressing, coordinated and well-sequenced ACP activity remains crucial, not only to unlock early benefits but to ensure that modernisation advances as a truly national programme, not just one concentrated in the South. Achieving the goals of the AMS depends on simultaneous progress across all regions.

1.2. Introduction to ACOG, the Masterplan and the Programme

5. The Airspace Change Organising Group (ACOG) is a dedicated team of technical, programme management, and communications specialists responsible for coordinating and driving the delivery of the strategically important ACPs set out in the Masterplan, aligning system-wide improvements at both regional and national levels.

6. ACOG operates as a ring-fenced function within NATS (En Route) plc (NERL). Its governance is overseen by a Steering Committee of senior, cross-sector experts. ACOG is funded through commercial air transport user charges and resourced under NERL's regulatory Business Plan. While NERL is accountable under its licence for the Masterplan, this obligation is delivered through ACOG's work.
7. The development of the Masterplan occurs in formal iterations, aligned with the CAA's CAP1616 airspace change process. Each iteration is reviewed by the co-sponsors (DfT and CAA) and, if accepted, becomes part of the AMS. Once accepted, individual ACPs must align with the Masterplan, ensuring that change is delivered in a coherent and strategic manner.
8. Iteration 1 (2020) established a high-level view of airspace change needs in the South of England. Iteration 2 (2022) expanded this to a UK-wide plan, grouping ACPs into four regional clusters: London and the Southeast, West of England, Northern England, and Scotland. This clustering approach enables regional changes to be delivered separately while retaining a coherent sequence of airspace upgrades at the national level.
9. Iteration 3 sets out how each regional cluster functions as an integrated airspace system. It captures the structural design options, highlights conflicts and trade-offs between the constituent ACPs, and presents early views on potential cumulative environmental and operational impacts. This work helps to inform the public consultations conducted under the CAP1616 process. Iteration 4 will follow, incorporating feedback from ACP consultations to describe final proposed trade-offs and updated cumulative impacts.
10. In June 2025, the Government announced the creation of UKADS to take forward the airspace modernisation in the Southeast cluster. While UKADS will assume responsibility for planning and delivery in that region, the DfT and CAA confirmed the continued need for ACOG's coordination role in the remaining clusters. ACOG's system-wide perspective, cross-sponsor collaboration experience, and technical expertise are recognised as critical to maintaining delivery momentum, especially in Northern England, Scotland and the West, where the programme is advancing through key design phases and approaching public consultation.
11. Looking ahead, ACOG's skills, tools, and delivery experience provide a strong foundation for supporting UKADS and the wider airspace modernisation deployment plan. The co-sponsors' position is that ACOG's residual functions should be retained, initially under a scaled remit for the non-London clusters, with potential integration into the UKADS structure as the scope and demand evolves.

1.3. ACOG Governance Arrangements

12. As co-sponsors of airspace modernisation, DfT and CAA set the policy direction and regulatory framework that govern ACOG's functions. This oversight is embedded within the AMS, to which ACOG's activities must align. In this context, ACOG has had to operate not only as a technical coordinator but also as a responsive and agile delivery organisation.
13. At the centre of ACOG's governance is the ACOG Steering Committee, chaired by an independent non-executive Chair. The Committee is comprised of nine additional members with a wide breadth of aviation, infrastructure, and regulatory expertise, as well as proven leadership experience in complex, national-scale programmes.

14. Over the past year, the Steering Committee has played a pivotal role in guiding ACOG through a period of considerable uncertainty and transformation. As government proposals for UKADS took shape, and the associated regulatory framework for airspace change evolved, the Committee provided stability, challenge, and strategic direction. It helped steer the programme through ongoing policy shifts, gaps in specialist capacity, funding constraints for airport led ACPs, and the need to revise earlier design work and regulatory submissions, while maintaining coherence across each regional cluster.
15. The Committee performs the primary governance function of assuring ACOG's programme of work and deliverables, including the formal sign-off of each iteration of the Masterplan. Its responsibilities include:
 - Acting collegially to provide constructive challenge, strategic guidance, and expert advice to ensure ACOG's objectives and outputs are clearly defined, consistently understood, and delivered to a high standard.
 - Overseeing programme delivery and using best endeavours to resolve challenges in a timely manner, operating as independent subject matter experts, not representatives of stakeholder groups.
 - Advising the co-sponsors when consensus cannot be reached, presenting a balanced range of views along with recommended options.
 - Participating in the review of ACOG's budget as part of NERL's Reference Period planning, ensuring transparency and proportionality through stakeholder consultation.
 - Reviewing the effectiveness of ACOG's structure, governance, and delivery mechanisms, and driving improvements to ensure the programme remains efficient, credible, and fit for purpose.
16. ACOG maintains a structured and transparent reporting relationship with the co-sponsors, including updates to the DfT's Airspace Modernisation Stakeholder Engagement Group and regular briefings to Ministers by the Chair of the Steering Committee. In addition to routine reporting, ACOG has provided targeted advice to the co-sponsors through formal advice papers on several critical issues. These have included: the availability and alignment of specialist resources across delivery entities; shortfalls in programme funding, particularly for airport-led ACPs, and recommendations for addressing ACPs within the Masterplan that have failed to reach Stage 3 (consultation) of the CAP1616 process within programme-critical timeframes. This proactive guidance has helped the co-sponsors assess risk, prioritise action, and safeguard the coherence and momentum of the wider modernisation effort.
17. To support continuous improvement and external assurance, ACOG is subject to regular audits and quality reviews. It underwent an independent audit in Q3 2024, which assessed the organisation's structure, core functions, and internal processes. ACOG also holds ISO 9001 certification for its quality management system, originally achieved in 2021 and successfully reaccredited annually thereafter ensuring operational rigour and adherence to international standards.

1.4. ACOG's role and functions

18. Since its establishment in 2019, ACOG has played a central role in coordinating one of the most complex infrastructure initiatives in UK aviation, the modernisation of the national airspace system. Conceived as an independent and impartial planning and programme delivery group, ACOG is tasked with enabling a coordinated and coherent approach to strategically important airspace changes. This is to ensure that multiple, interdependent ACPs are developed in alignment with a single, integrated strategy as captured in the Masterplan.
19. ACOG's remit is not to redesign airspace directly or to develop the ACPs. Instead, its value lies in its unique system-wide scope and ability to act as an impartial orchestrator across a diverse mix of stakeholders. This includes coordinating activity across the leading airport ACP sponsors, NATS, CAA, DfT, Airlines, the Military, General Aviation and new entrants. ACOG's coordination ensures that airspace design interdependencies are managed, potential conflicts are identified early and trade-offs, such as those relating to noise, emissions or capacity are made transparently and with reference to national policy objectives.
20. ACOG leads the development of the Masterplan through an evidence-driven, iterative process. It works closely with ACP sponsors to understand and sequence their proposals, assess their cumulative impacts and shape the design envelopes within which each sponsor must operate. In doing so, ACOG provides assurance that the individual ACPs are not being pursued in isolation or at cross-purposes with others. Its structured scenario modelling and risk analysis support informed decisions by both stakeholders and the co-sponsors.
21. As a delivery-focused organisation, ACOG also performs a range of enabling functions that go beyond coordination. These include technical integration of airspace design inputs across ACPs, development of national-level environmental baselines and metrics and production of shared tools and guidance that raise consistency and quality standards. ACOG also plays a leading role in stakeholder engagement strategy and delivery, providing common messaging, facilitating regional communications and advising on public consultation alignment to ensure the integrity of the process under CAP1616.
22. Critically, ACOG acts as an important assurance mechanism for the co-sponsors, highlighting risks that could undermine programme delivery, such as misalignment of timelines, resourcing shortfalls or regulatory bottlenecks. Through formal advice papers and routine reporting, ACOG has helped to prioritise actions and maintain a credible deployment programme, even as wider policy, funding and process arrangements have evolved.
23. Looking ahead, ACOG's capability, experience and knowledge position it as a critical enabler of the UK's longer-term airspace modernisation. As the transition to UKADS progresses, ACOG is well-placed to support a smooth handover in the Southeast and to continue delivering for Northern England, Scotland, and the West. Its continued evolution will be shaped by the needs of the wider system, but its central purpose remains unchanged: to safeguard the coherence, credibility, and deliverability of the UK's airspace modernisation programme.

2. Review of 2024/25 achievements and activities looking ahead to 2025/26

24. ACOG's objectives in table 1 provide a useful point of reference to consider the key achievements of 2024/25 and look ahead at the major activities for 2025/26.

TABLE 1: ACOG's Objectives

1.	Lead the creation of a credible and implementable Masterplan for the Programme, working collaboratively with ACP sponsors and other stakeholders.
2.	Coordinate optimised airspace decisions through the identification of design interdependencies and facilitation of cumulative analysis and trade-off decisions.
3.	Demonstrate the collective benefits and impacts of the Programme.
4.	Build a broad base of support for airspace modernisation and join up the ACP sponsors' approach to public consultations on interdependent ACPs.

2.1. Lead the creation of a credible and implementable Masterplan

25. The development of a credible and implementable Masterplan remains a core pillar of ACOG's mission, coordinating the technical, regulatory, and stakeholder efforts required to deliver airspace change at a national scale. In 2024/25, significant progress was made across multiple regional clusters, with ACOG guiding the alignment of individual ACPs into cohesive system-wide proposals. In Scotland and Northern England, this included successful air traffic control development simulations, regulatory gateway reviews, and the submission of cluster-wide Masterplans informed by targeted public engagement.
26. ACOG's coordination role expanded during 2024/25 to include hands-on delivery support across several critical programme areas. This included active involvement in the development of Full Options Appraisals (FOAs), shaping joint sponsor consultation strategies, supporting cluster-level deployment planning, and leading the structured application of the Cumulative Assessment Framework (CAF) to assess system-wide trade-offs and interdependencies.
27. This expanded role is most evident in the Scottish cluster, where ACOG stepped in to directly support Edinburgh Airport's delayed Stage 3 ACP submission. ACOG provided tailored technical and analytical assistance to address gaps identified in the initial FOA, including targeted rework of noise and CO₂ impact assessments, drafting of regulatory documentation, and alignment of design narratives with wider cluster objectives.
28. This intervention helped contain wider programme delays, ensured consistency with the Glasgow and NATS ACPs, and preserved the credibility of the Scottish cluster Masterplan.
29. ACOG is also playing an increasingly active delivery role in the Northern England cluster, working across multiple sponsors to coordinate FOA preparation identify key design interdependencies, and prepare cluster-wide documentation to support the

next phase of consultation planning. In the West, following the formal withdrawal of Exeter and Cardiff Airports, ACOG is working with Bristol Airport and NATS to restructure the delivery model and prepare for simulations and public consultation. Meanwhile, in the Southeast, ACOG supported the alignment of the ACPs under the London Airspace South initiative and helped prepare the technical and planning groundwork for the wider cluster, pending the UKADS developments. Across all these regions, ACOG's expanded remit proved critical to sustaining delivery momentum and ensuring that complex, interdependent ACPs remained aligned as they progressed through the regulatory process.

30. Table 2, on the next page summarises the main achievements by cluster and outlines the key activities ACOG will lead and support over during FY2025/26.

TABLE 2: Preparing the Masterplan, achievements and activities looking ahead

Theme	24/25 achievements and 25/26 activities lookahead
SCOTLAND	<p><u>Q1: April to June 2024</u></p> <ul style="list-style-type: none"> • Stakeholder engagement: ACOG led the delivery of a successful Public Engagement Exercise (PEX) for the cluster. The exercise captured meaningful inputs from communities and operational stakeholders. • Drafting the Masterplan: Working closely with the Scottish ACP sponsors, ACOG collated PEX feedback and coordinated the development of a comprehensive draft Airspace Change Masterplan for the cluster, which was submitted to the co-sponsors for assessment. • Identifying and resolving design issues: During ACOG-led review sessions, issues were identified with one ACP's options evaluation, triggering targeted rework to strengthen proposal and regulatory process compliance. • System validation: A successful ATC simulation of the system-level design was completed in June 2024, marking a key milestone in verifying the operational feasibility of the proposed changes. <p><u>Q2: July to September 2024</u></p> <ul style="list-style-type: none"> • Conditional approval of the Masterplan: The co-sponsors issued a statement of acceptance in principle for the Scottish Cluster Masterplan Iteration 3, pending completion of the Stage 3 regulatory gateways by the ACP sponsors. • Design recovery and alignment: Edinburgh Airport revised its options evaluation in close collaboration with ACOG to strengthen the analysis. ACOG's support helped contain programme delays, allowing Glasgow Airport and NERL to proceed on schedule towards Stage 3 ACP submissions. <p><u>Q3: October to December 2024</u></p>

- **Regulatory progress:** Glasgow Airport and NERL successfully passed their Stage 3 Gateway reviews after incorporating feedback from the CAA, with ACOG facilitating cross-sponsor alignment and document preparation.
- **Targeted recovery plan:** Edinburgh Airport did not pass its intended Stage 3 Gateway in Q3 and formally requested a revised submission date for Q1 2025. ACOG began developing a tailored support plan to address technical gaps and accelerate readiness for resubmission.

Q4: January to March 2025

- **Resubmission support:** ACOG provided direct assistance to Edinburgh Airport in preparing its revised Stage 3 submission, including technical input, documentation review, and facilitation with other sponsors.
- **Joint technical guidance:** ACOG convened workshops with NERL, the CAA, and key stakeholders to progress new national guidance on vertical interactions in terminal airspace design, supporting improved consistency across all clusters.
- **Collaborative delivery:** ACOG coordinated support from Glasgow Airport and NERL to assist the Edinburgh Airport re-work, ensuring consistency, shared ownership of cluster progress and maximising the likelihood of a successful gateway in Q2 2025.

Activities lookahead 2025/26

- a) **Provide direct delivery support** for the finalising of Edinburgh Airport's Stage 3 resubmission, ensuring that all documentation reflects CAA feedback and aligns with CAP1616 requirements. (Q1)
- b) **Review and update cluster-wide materials**, including shared technical assumptions, system-wide diagrams, and modelling outputs to ensure consistency across ACPs ahead of the revised Stage 3 gateway. (Q1)
- c) **Lead the response to the outcome of Edinburgh's revised Stage 3** gateway decision, coordinating contingency actions if required or driving public consultation planning activity if successful. (Q2)
- d) **Drive detailed preparation for public consultation** aligning sponsor timelines, finalising shared content, and establishing stakeholder engagement channels. (Q2)
- e) **Support the launch of public consultation** on the system-wide airspace modernisation proposal for the Scottish Cluster, subject to successful Edinburgh Gateway. (Q3)

	<p>f) Support the concurrent consultation on the Masterplan iteration 3 for the Scottish Cluster, ensuring that strategic context and cumulative impacts are clearly communicated to stakeholders. (Q3)</p> <p>g) Support delivery of the full consultation campaign, including facilitation of public events, ongoing engagement with elected representatives, issue tracking, and resolution of emergent risks. (Q4)</p> <p>h) Deliver robust analysis of public consultation feedback, identifying common themes, technical concerns, and emerging issues, and use these insights to drive data-driven updates to the Cluster-wide Masterplan and individual ACP designs. (Q4)</p>
<p>NORTHERN ENGLAND</p> <p><i>Coordinating development of the Northern England cluster ACPs and providing targeted delivery support</i></p>	<p><u>Q1: April to June 2024</u></p> <ul style="list-style-type: none"> • Simulation preparation: ACOG supported the cluster ACP sponsors in completing the pre-simulation activities required to validate design options and system-wide interactions. • Development simulation: ACOG worked closely with NERL and the airport ACP sponsors during a successful three-week air traffic control simulation exercise, concluding in June 2024. This marked a key milestone in testing the feasibility of the proposed system-wide design for Northern England. • Funding risks escalated: Through routine programme management meetings, ACOG identified critical funding shortfalls affecting airport ACP sponsors. ACOG raised the issue with the CAA and DfT, submitting advice papers that proposed potential mitigations to avoid programme delays. <p><u>Q2: July to September 2024</u></p> <ul style="list-style-type: none"> • Planned reopening of Doncaster Sheffield Airport: ACOG, working with NERL, assessed the implications of the proposed reopening of Doncaster Sheffield Airport on the wider cluster design and interdependencies. • Design conflict resolution: ACOG led technical working sessions with NERL and the airport ACP sponsors to identify emerging interdependencies and address potential design conflicts across proposals, an essential step for building a cohesive Masterplan. <p><u>Q3: October to December 2024</u></p> <ul style="list-style-type: none"> • Programme alignment: Liverpool John Lennon Airport formalised a 2025 delivery milestone plan with oversight from DfT and ACOG, defining key steps for design development in preparation for the FOA. <p><u>Q4: January to March 2025</u></p>

- **Leeds Bradford delivery support:** Leeds Bradford Airport worked toward its rescheduled Stage 2 Gateway, supported by ACOG's guidance on the content of the submission and process adherence.
- **Deployment planning:** ACOG facilitated workshops with all sponsors to update and restructure the Deployment Plan, ensuring it remained realistic and responsive to sponsor readiness and evolving priorities.

Activities lookahead 2025/26

- Provide proactive FOA development support to all ACP sponsors in the cluster (Q1-Q3), including:
 - Finalising a master FOA template and boilerplate content.
 - Advising on emissions, delay, and noise modelling methodologies.
 - Coordinating data inputs and producing document-ready outputs.
- Kick off the cluster-wide design story process, capturing the system option development logic and rationale that underpins all sponsor ACPs for future consultation documentation. (Q2)
- Develop and agree coordinated consultation principles, covering audience, materials, approach and timing, and produce a high-level consultation strategy to guide the development of detailed materials. (Q3)
- Begin safety assurance coordination, including early engagement with sponsors' safety leads to identify common assumptions and risks. (Q3)
- Develop a targeted Masterplan Iteration 3, focusing on applying the CAF methodologies to evaluate interdependencies, trade-offs, and cumulative impacts across the cluster (Q3-Q4).
- Coordinate political and stakeholder engagement, including targeted briefings for MPs, local government, consumer groups, and regional business organisations to ensure understanding and support prior to the formal public consultation. (Q3-Q4)
- Deliver a cluster-wide Consultation Annex, combining FOA outputs and CAF-driven cumulative impact assessments into a unified narrative. (Q4)
- Continue progress on safety assurance coordination, facilitating risk and assumptions workshops across the cluster to ensure consistency and prepare for the Stage 3 submissions. (Q4)

WEST CLUSTER

Q1: April to June 2024

- **Cluster realignment:** Following Cardiff Airport's formal withdrawal from the programme, ACOG worked closely with

Refocusing coordination efforts on Bristol Airport and NERL, ensuring the remaining programme scope remains viable

Bristol and Exeter Airports to reassess the cluster's scope and delivery strategy.

Contingency planning: In response to Exeter Airport's funding delays, which pushed its planned Stage 2 resubmission to Q1 2025, ACOG developed a revised programme plan with the remaining sponsors to preserve critical path progress and delivery feasibility for the cluster as a whole.

Q2: July to September 2024

- **Scenario planning:** ACOG conducted an options assessment to manage the evolving cluster structure, including the feasibility of formally splitting the West Cluster to separate Bristol and NERL from less-advanced ACPs.
- **Design refinement workshops:** ACOG facilitated a series of technical workshops with Bristol and NERL to progress the development of proposed system-wide designs, assess interdependencies, and evaluate the risk of more fundamental redesign work in light of the reduced cluster configuration.

Q3: October to December 2024

- **Future scope discussions:** ACOG continued dialogue with Exeter Airport regarding its potential re-entry to the programme, while advising on regulatory impacts and delivery implications of a formal withdrawal.
- **Simulation readiness:** Bristol Airport made significant progress toward its air traffic control development simulation scheduled for Q2 2025. ACOG provided coordination support and helped shape the accompanying stakeholder engagement and consultation planning framework.

Q4: January to March 2025

- **Development simulation:** In collaboration with the ACP sponsors, ACOG confirmed that Bristol Airport's simulation preparation activities met the required standard to proceed. This allowed NERL to formally commit development simulation resources for April 2025.
- **Programme scope confirmed:** Exeter Airport formally exited the programme. ACOG adjusted the cluster Deployment Plan accordingly, refocusing efforts on delivering a technically sound and strategically coherent system-wide proposal for the Bristol and NERL sponsored ACPs.

Activities lookahead 2025/26

- Provide tailored guidance and document drafting support for Bristol Airport's FOA, including standardised assumptions, analytical templates and coordinated review of emissions, noise, and cost-benefit modelling outputs. (Q1-Q3)

	<ul style="list-style-type: none"> b) Lead the development of a proportionate consultation strategy for the West Cluster, coordinated with NATS, and aligned with CAP1616 expectations, covering audience, format, duration, and core messaging. (Q1-Q3). c) Draft common consultation content for both sponsors, including system-wide design rationale, national airspace modernisation context, and cluster-specific impacts. (Q4) d) Coordinate redline reviews to ensure alignment between NATS and Bristol ACP documents. (Q4) e) Deliver a focused Masterplan Iteration 3 for the West Cluster that transparently applies the CAF to assess interdependencies and trade-offs. (Q4) f) Facilitate safety workshops with NATS and Bristol to define shared system assumptions, evaluate interface risks, and prepare safety assurance documentation for the West Cluster Masterplan Iteration 3. (Q4)
SOUTHEAST <i>maintaining delivery momentum across interdependent ACP milestones during the UKADS development and consultation phase</i>	<p><u>Q1: April to June 2024</u></p> <ul style="list-style-type: none"> • Public engagement and planning: ACOG worked with Gatwick Airport and NATS to deliver a successful Public Engagement Exercise (PEX) for the London Airspace South initiative, helping coordinate the approach and capturing stakeholder feedback to inform the first phase of deployment in the Southeast cluster. • Masterplan submission: Working collaboratively with Gatwick and NATS, ACOG prepared and submitted the draft Airspace Change Masterplan Iteration 3 for London Airspace South to the co-sponsors for assessment, marking a key programme milestone. • Strategic withdrawal review: ACOG assessed the implications of Bournemouth Airport's potential withdrawal from the cluster, preparing supplementary materials to support co-sponsor decision-making and limit programme disruption. • Design alignment: Luton and Stansted Airports completed refinements to their ACP design options in preparation for integration with the wider cluster. <p><u>Q2: July to September 2024</u></p> <ul style="list-style-type: none"> • Masterplan endorsed in principle: The CAA issued an acceptance-in-principle decision on the London Airspace South Masterplan developed by ACOG, subject to the successful progression of the constituent ACPs through the Stage 3 gateways • ACP progression: ACOG provided technical and planning support to Heathrow Airport, which passed its Stage 2 Gateway

and moved formally into Stage 3, strengthening alignment with the wider cluster programme.

Q3: October to December 2024

- **Sponsor progression:** ACOG supported Southend and Farnborough Airports in successfully passing their Stage 2 Gateways in November 2024, ensuring their ACPs remained aligned with cluster-level timelines and regulatory dependencies.
- **Gateway delay support:** Following Bournemouth Airport's Stage 2 Gateway failure, ACOG initiated a targeted review to assess the residual impact on the Cluster design and advised on options to minimise knock-on delays.
- **Design development oversight:** ACOG continued to engage with Heathrow Airport to support the ongoing development of the next phase of its design options, scheduled for completion in Q3 2025, ensuring system-level compatibility and forward readiness.

Q4: January to March 2025

- **London Airspace South Gateway coordination:** ACOG formally submitted the London Airspace South sponsor's request for a Stage 3 Gateway review to the CAA and worked with all stakeholders to prepare for an updated October 2025 gateway submission date, managing documentation alignment, regulatory engagement, and programme-level assurance.

Activities lookahead 2025/26

The full end-to-end process for the development, consultation, and deployment of the ACPs within the Southeast Cluster, under the proposed UK Airspace Design Service (UKADS) arrangements, has not yet been formally defined, consulted upon, or agreed by the co-sponsors. As a result, there is currently no confirmed delivery model, ACP sponsor assignment, or regulatory pathway for progressing modernisation in this regional cluster.

Until further clarity emerges through the UKADS policy process, the scope, sequencing, and timeline of key programme milestones for the Southeast Cluster remain provisional. ACOG will continue to work closely with the co-sponsors to support transition planning and ensure that strategic alignment, technical continuity, and delivery readiness are preserved as the UKADS arrangements evolve and are established. A revised programme plan and delivery roadmap for the Southeast cluster will be published once the future governance, design authority, and delivery structures have been finalised and enacted.

2.2. Coordinate optimised airspace design decisions

31. ACOG made significant progress in 2024/25 in strengthening the analytical, governance, and data-driven foundations required to enable better coordinated and optimised airspace decisions across multiple ACP sponsors and regional clusters. These efforts focused on improving how design interdependencies are identified, evaluated, and addressed in the Programme and reflected in Masterplan and ACP documentation, while also elevating the organisation's internal capabilities in risk, quality, data integration, and airspace visualisation.
32. Table 3 summarises the outcomes achieved in the past year, organised by theme, and a lookahead at the key related activities for the next 12 months.

TABLE 3: Coordinating optimised airspace design decisions, achievements and activities looking ahead

Theme	24/25 achievements and 25/26 activities lookahead
System-Wide Design Visualisation and Trade-Off Tools	<p>2024/25 achievements</p> <p>To support holistic design decisions, ACOG expanded and deployed a suite of digital tools to enable interdependency analysis.</p> <p>In collaboration with the CAA, ACOG deployed the Flight Path Design Visual Repository (DVR), an interactive, web-based mapping platform that provides a uniform view of all existing and proposed flight paths and airspace structures included within the scope of the Masterplan for each regional cluster.</p> <p>The tool was actively used to support design integration efforts in the Scotland and Northern England clusters, allowing ACP sponsors to view cumulative effects, identify route conflicts, and explore system-level trade-offs more intuitively.</p> <p>Activities lookahead 2025/26</p> <ol style="list-style-type: none"> a) Enhance DVR usability by incorporating user feedback from regulators, sponsors, and consultation teams to improve navigation, labelling, and filtering of flight path data. b) Integrate stakeholder-focused overlays, such as noise footprints, airspace classifications, and areas of population density, to make DVR outputs more intuitive and consultation-ready. c) Develop a consultation mode for the DVR to allow the public and community representatives to view proposed changes through a simplified, web-accessible version.
ACP data provision	<p>2024/25 achievements</p> <p>ACOG successfully negotiated and coordinated shared access to critical reference data, including historic flight tracks, meteorological data, and environmental impact datasets, enabling greater consistency in modelling and FOA inputs across ACPs.</p>

A dedicated analyst was onboarded to manage geospatial data and support wider analytical functions, including FOA guidance, document drafting, and modelling standardisation.

These capabilities were used to directly support ACP sponsors, particularly in the Scottish Cluster, through tailored technical analysis, guidance on appraisal methodologies, and the development of shared assumptions and design parameters. The outputs also fed into the production of advice papers to the co-sponsors, underpinning recommendations on cluster prioritisation, funding gaps, and integration risks.

Activities lookahead 2025/26

- a) Consolidate and publish common datasets for use in ACP FOAs, including updated population density maps, vectoring patterns, noise-sensitive areas, and planned residential developments sourced from local authorities. (Q1 and Q2)
- b) Create a data standards pack for sponsors, aligning assumptions on emissions baselines, aircraft performance models, and temporal profiles of demand, reducing discrepancies across cluster FOAs. (Q2 and Q3)
- c) Expand access to historical flight track and dispersion data, including graphical products that can be inserted directly into FOAs and public-facing materials to show expected noise and emissions impacts. (Q3 and Q4)

CAF Integration and System Impact Assessment

2024/25 achievements

Throughout the year, ACOG applied the Cumulative Assessment Framework methodologies to assess the expected benefits, constraints, and impacts of the modernisation ACPs included in the Scotland, Northern England and London Airspace South clusters.

This included structured analysis of potential interdependencies, the alignment of FOA modelling assumptions, and scenario testing to evaluate sensitivity to traffic forecasting and design alternatives. These outputs directly informed the drafting of Masterplan Iteration 3 for each cluster, elevating their transparency and credibility.

Activities lookahead 2025/26

- a) Finalise the CAF Part 2 assessment for the Northern England Cluster, quantifying cumulative impacts, potential conflicts, and overall benefit profiles across airport-led and NATS ACPs. (Q3 and Q4)
- b) Link CAF results directly to DVR outputs, allowing visual representation of trade-offs (e.g. noise vs. CO₂) and identifying design dependencies across overlapping ACPs. (Q3 and Q4)
- c) Integrate CAF insights into the Masterplan Iteration 3 narrative, including a standalone cumulative impact annex to accompany the Northern England consultation materials. (Q3 and Q4)

**Programme
Governance,
Risk and
Quality
Management**

2024/25 achievements

ACOG internally developed and deployed a bespoke programme risk management system, enabling real-time tracking of cluster-wide risks, mitigations, and escalation procedures. The tool was integrated into programme governance routines and provided structured input to monthly and quarterly reviews, helping prioritise sponsor support and trigger early intervention where risks threatened key milestones.

The year also saw the transition of ACOG's Quality Management System from 'managed' to 'fully defined' maturity. This included updating the Team Management Plan to reflect evolving roles and responsibilities and aligning staff development with delivery of quality objectives. New training modules and controls were introduced to ensure consistency and rigour in deliverables across the Masterplan, ACP guidance, and analytical outputs.

Activities lookahead 2025/26

- a) **Roll out a standardised assurance checkpoint process**, allowing ACOG to assess quality and regulatory readiness of sponsor deliverables at key milestones (e.g. pre-Gateway submissions). (Q1 and Q2)
- b) **Expand the risk management tool's integration** into monthly sponsor meetings, allowing real-time tracking of key risks and prompting early warning indicator reviews for cross-cluster impacts. (Q1 and Q2)
- c) **Audit and update ACOG's internal QMS documentation**, ensuring alignment with new UKADS structures (once confirmed) and the evolving Masterplan development framework. (ongoing)

2.3. Demonstrate the collective benefits and impacts

33. In 2024/25, ACOG strengthened the foundations for long-term performance measurement and environmental evaluation of UK airspace modernisation through the delivery of several strategic analytical initiatives. These initiatives not only increase transparency and regulatory readiness but also support the credibility of the Masterplan by embedding consistent, evidence-led methods for assessing benefits and impacts.
34. Table 4 summarises the outcomes achieved in the past year, organised by theme, and a lookahead at the key related activities for the next 12 months.

TABLE 4: Demonstrating benefits and impacts, achievements and activities looking ahead

Theme	24/25 achievements and 25/26 activities lookahead
Programme Benefits Strategy	<p>2024/25 achievements</p> <p>ACOG produced a structured Benefits Strategy to guide how the effects of Masterplan-related airspace changes, both positive and negative, are measured and communicated. This document establishes a clear framework for evaluating outcomes at the national and regional cluster levels, encompassing environmental, operational, and community dimensions. It provides the foundation for coherent, cross-ACP benefit reporting and aligns with CAA expectations for transparency and traceability in major airspace change programmes.</p> <p>Activities lookahead 2025/26</p> <ol style="list-style-type: none"> a) Coordinate a benefits working group with sponsor and regulator representatives to monitor evolving benefit assumptions and integrate lessons learned from consultations and environmental assessments. (Q2 and Q3) b) Produce a cross-cluster synthesis report highlighting cumulative programme-level benefits (e.g. CO₂ reduction potential, delay minimisation, noise footprint shifts), structured to support co-sponsor reporting and stakeholder briefings. (Q2 and Q3) c) Develop benefits infographics and storytelling materials for public consultation to explain the broader drivers behind modernisation proposals in clear, relatable terms. (Q3 and Q4)
Sandbox Environmental Dataset	<p>2024/25 achievements</p> <p>ACOG completed the first iteration of its Sandbox Environmental Dataset, a modular data environment used to simulate and test the expected impacts of airspace changes across noise, CO₂, and delay metrics. This virtual testbed enables sensitivity analysis of different route configurations and supports calibration of assumptions used in FOAs.</p>

The next step will involve validating Sandbox outputs against real ACP assessments, improving confidence in forecasts and strengthening the analytical backbone of the Masterplan.

Activities lookahead 2025/26

- a) Incorporate updated sponsor-supplied traffic forecasts and fleet mixes into the Sandbox to ensure alignment with current ACP baselines and scenarios.
- b) Develop modular scenario templates (e.g. high growth, net zero transition) to allow testing of alternative futures and assess sensitivity of benefit forecasts under different conditions.
- c) Produce visual materials that summarise Sandbox findings for each cluster, supporting both internal planning and external engagement.

Development of the UK Airspace Modernisation Impact Taxonomy

2024/25 achievements

ACOG rolled out a structured impact taxonomy to standardise how benefits, disbenefits, and trade-offs are described across ACPs and clusters. This taxonomy introduces a consistent vocabulary and set of classifications, covering themes such as noise exposure, fuel burn, flight efficiency, which are now embedded in the Masterplan guidance materials.

The taxonomy helps ensure coherence across FOAs, enables cumulative impact assessments, and supports clearer communication of outcomes to both decision-makers and the public.

Activities lookahead 2025/26

- a) **Update the taxonomy based on sponsor and regulator feedback**, expanding definitions in areas such as accessibility, fuel uplift, and noise mitigation, and incorporating illustrative examples. (Q2)
- b) **Map taxonomy terms to CAF outputs** to create a bridge between environmental modelling and the broader strategic narrative used in the Masterplan and improve accessibility of technical information for external stakeholders. (Q3)

2.4. Stakeholder communications and engagement

35. As part of its coordination role, ACOG continued to engage a wide range of stakeholders across the aviation, political, and community landscape to build awareness of the need for airspace modernisation and prepare the ground for upcoming public consultations. In 2024/25, this work focused on fostering a broader understanding of why modernisation is critical to the UK's future airspace, what it involves, and how local communities and regional economies will be affected.
36. Through targeted outreach and national campaigns such as One Sky One Plan and Time Flies, ACOG used clear, accessible storytelling to highlight the growing mismatch between outdated airspace structures and today's aviation technologies and needs. These activities laid the groundwork for more constructive consultation by equipping stakeholders, including elected representatives, business groups, and communities with the context to engage meaningfully when the ACPs enter the public consultation phase.
37. Table 5 summarises the outcomes achieved in the past year, organised by theme, and a lookahead at the key related activities for the next 12 months.

TABLE 5: Stakeholder communications and engagement, achievements and activities looking ahead

Theme	24/25 Achievements	25/26 Activities Lookahead
Government and Parliamentary Engagement	<ul style="list-style-type: none"> In June 2024, ACOG helped secure a commitment from the Labour Party in its election manifesto to 'encourage airspace modernisation.' Following strong engagement with Mike Kane MP in his Shadow Aviation Minister role, ACOG has continued to provide regular updates since the General Election and becoming the Aviation Minister. ACOG has continued to be an active participant in the Government's newly formed 'Airspace Modernisation Stakeholder Engagement Group'. 	<ul style="list-style-type: none"> Briefings will be offered for constituency MPs in Scotland and the London Airspace South region ahead of the public consultations to provide context and awareness around the process. Direct engagement, including briefings with relevant Ministers and constituency MPs as part of ongoing parliamentary engagement exercises. Regular briefings offered to MPs who hold a particular interest in airspace modernisation. These include MPs local to airports keen to understand how ACPs may affect communities. ACOG's Chair Sir Timo Anderson regularly provides updates to the Minister for Aviation, highlighting key areas

		of progress and the main challenges.
External stakeholder engagement	<ul style="list-style-type: none"> ACOG published the feedback documents from the two public engagement exercises held in Q1 24 to demonstrate how the feedback had been considered in the development of the Masterplan. ACOG worked closely with ACP sponsors in the Scotland cluster as part of their Stage 3 submissions, including producing an overarching document detailing the coordinated elements of the proposals. ACOG launched a refreshed version of the One Sky One Plan report in September 2024 which we sent out to our key stakeholders in Westminster including local airport MPs, Transport Select Committee members and others with a strong interest in the issue. This also saw coverage in a selection of trade media outlets. In January 2025, ACOG met the Cross-Party Group on Aviation in Scotland to discuss the airspace changes due to take place in that cluster. In February 2025, ACOG followed up with an infographic send out to stakeholders highlighting the case for airspace modernisation and what 	<ul style="list-style-type: none"> Produce an 'easy read' versions of key Masterplan material to help explain the Cumulative Analysis Framework and how interdependencies are managed between Sponsors. Using the Northern England ACP sponsors' individual consultation strategies, ACOG will produce an overarching document detailing the coordinated elements of the forthcoming consultation exercises, including a joint timetable of activity. ACOG Chairman to regularly attend the Airspace Modernisation Stakeholder Group. Continue to promote and develop new content for the Time Flies campaign, building awareness of the drivers and benefits of airspace modernisation across the industry, business and general public.

needed to happen this year to make progress.

Digital engagement

- ACOG has continued a drumbeat of content across our digital channels, from a Christmas campaign to employee led profiles, which has seen strong engagement on our LinkedIn channel.
- The September 2024 newsletter saw 57.1% opens and 34% clicks which is the highest open and click rate we have ever had, showing the breadth of engagement with the One Sky One Plan campaign.
- We have seen a 15% increase in followers on LinkedIn this year, nearly 25,000 total impressions and over 550 post reactions.

Continue to generate new assets for ACOG's social channels to ensure a drumbeat of activity which keeps our stakeholders regularly informed and engaged in the airspace modernisation process.

3. Risks to the Programme

38. The ACOG risk management process has two elements: a horizon scanning risk management function; and a programme risk management function. Both elements also record and reflect opportunities that may arise. The Horizon risks are longer-term strategic risks to airspace modernisation. These are set in the wider context outside the immediate scope of the Masterplan. Critically, these risks are not “owned” by ACOG because of their strategic nature but we are closely engaged with stakeholders to assist in their identification and management. The risks tend towards externalities such as policy, regulation and environmental factors that must be managed by careful collaboration with those stakeholders with accountability for the mitigations, such as the DfT and CAA.
39. The ACOG Steering Committee regularly reviews the horizon scanning risk register to consider the appropriate management approach. Although the risks are by and large tolerated by ACOG for now, by adopting a clustered approach to the Masterplan ACPs, ACOG has sought to minimise the risk to the overall deployment plan and benefits realisation. Where a “tolerate” approach has been judged to be insufficient, ACOG has engaged with stakeholders such as the CAA and DfT to work with risk owners to put mitigations in place.
40. The second element, the programme risk register, contains risks that directly affect the preparation of the Masterplan and ACOG’s ability to deliver the programme. These risks are actively managed through the internal ACOG team risk management process. An independent ISO90001 accreditation audit identified the ACOG team risk management process as best practice and above the ISO standard. A summary of the key horizon scanning and programme risks are set out in tables 6 and 7, along with an overview of the management approach.

TABLE 6: Summary of horizon scanning risks and management approach

#	Horizon scanning risks	Management approach
1	Fragmentation of delivery due to weak business cases or investment gaps There is a continued risk that key delivery partners, especially airport-led ACP sponsors, are unable or unwilling to develop viable, integrated business cases. Without sustained investment from sponsors and the provision of centralised funding support, the Programme may become further fragmented, undermining the system-wide coherence of the proposed upgrades. The fluctuating nature of airport revenues and uncertainty regarding central funding arrangements further heighten the risk.	ACOG remains actively engaged with ACP sponsors under financial pressure, offering delivery support, tailored technical guidance, and advice to regulators on where programme flexibilities may be needed, while maintaining dialogue with DfT and CAA on the size and nature of funding pathways.
2	Inability of the wider AMS to support integration of new airspace users: While the Masterplan focuses on strategically critical ACPs in congested terminal airspace, demand for airspace from new entrants, such as drones and	ACOG has taken proactive steps to represent the needs of diverse user groups. Through its system-level work, ACOG

	<p>advanced aerial mobility operators is accelerating. Without a coherent, joined-up approach to airspace integration, there is a risk of fragmented developments and suboptimal design that does not meet international standards or national airspace modernisation needs.</p>	<p>identifies integration risks and opportunities and flags alignment gaps to co-sponsors to influence policy, regulatory frameworks, and operational concepts.</p>
3	<p>Policy or legal shifts disrupt environmental design decisions:</p> <p>A change in environmental policy, regulatory change processes, or the introduction of new delivery models such as UKADS could prompt re-evaluation of system-level trade-offs already coordinated through the Masterplan. This might result in costly design rework, potential legal risk, and delays in deployment. A shift in priorities, such as a stronger focus on equity of noise distribution or net-zero compliance, could also prompt retrospective scrutiny.</p>	<p>ACOG has invested in the development of its Cumulative Analysis Framework (CAF) to enable structured, auditable trade-offs between competing factors. This approach helps future-proof designs by improving traceability and transparency.</p>
4	<p>Insufficient sector-wide capacity stalls delivery progress:</p> <p>There remains a structural risk that a shortage of specialist technical resources across airports, ANSPs, and regulators will constrain the Programme's ability to deliver multiple ACPs concurrently. Although the clustered delivery model provides boundaries to allow one area to proceed when another is unable, there is a risk that even if one sponsor falls behind, it may affect system coherence and delay shared benefits.</p>	<p>ACOG has worked collaboratively across the sector to map resource constraints and surface delivery risks. The CAA has begun taking action to address internal capacity, and ACOG will continue to support workforce planning.</p>

TABLE 7: Summary of programme risks and management approach

#	Programme risks	Management approach
1	<p>Programme compression across clusters:</p> <p>Delays triggered by missed regulatory gateways, sponsor funding gaps, planning issues, or unanticipated design challenges may cause timeline convergence across clusters. This bunching effect, where multiple ACPs across different regions stack up in the same deployment window, would strain delivery capacity. The resulting congestion could make timely deployment of major airspace changes unfeasible, jeopardising realisation of the strategic benefits.</p>	ACOG uses rolling milestone tracking and risk-based reforecasting to anticipate and manage timeline compression scenarios. It works closely with ACP sponsors and the CAA to reset plans where required and build flexibility into the cluster-level deployment plans to absorb limited slippage.
2	<p>Uncertainty around future airport expansion in the Southeast:</p> <p>The lack of confirmed plans and timeframes for potential runway expansions and other infrastructure changes at major Southeast airports (e.g. Heathrow, Gatwick, Luton) presents a challenge to ACP scoping. This makes it difficult for airport sponsors and NATS to define the appropriate scale, direction, and timing of the LTMA ACPs, increasing the risk of design misalignment or the need for major rework once airport plans are clarified.</p>	The intention to establish UKADS 1 will, in part, mitigate this risk and in the meantime ACOG maintains ongoing dialogue with key airport ACP sponsors, monitoring their strategic planning intentions and evaluating the impact on the Programme.
3	<p>Potential changes to ACOG's remit under the UKADS proposal:</p> <p>The proposed establishment of a Single Design Entity for the Southeast cluster under the UKADS initiative will result in a significant redefinition of ACOG's delivery responsibilities. While this could enhance coordination and design capability for the Southeast cluster ACPs, there is a risk of transitional disruption, delayed decision-making, overlapping mandates, or duplication of effort that could compromise ACOG's ability to maintain momentum across the non-London regional clusters.</p>	ACOG is working closely with the co-sponsors to stay ahead of emerging policy direction and delivery proposals. It has provided formal input into the UKADS consultation process and is actively supporting transition planning to preserve continuity in design coordination, data governance, and stakeholder management.

4. Finance

41. The ACOG budget is funded through the NERL portion of the UK en route unit rate. ACOG has discretion in performing its duties and authority over the use of its budget. The ACOG Steering Committee monitors ACOG's financial performance and NERL retains "arms-length" oversight of ACOG's activity via its regulatory licence requirements. ACOG's budget includes the costs of its resources, external suppliers and discretionary spend. The costs associated with some supporting functions, including premises, payroll and resources, are absorbed by NERL and not presented here.
42. Table 8 sets out the actual and forecast costs associated with ACOG's activities against the CAA assumptions for the fiscal years 2023 to 2027.

TABLE 8: Budgeted, forecast and actual costs associated with ACOG's activities, 2023 - 2027

2020 prices £m	2023	2024	2025	2026	2027	Total
Actual/Forecast	£2.9m	£3.6m	£3.1m	£3.3m	£3.3m	£16.2m
CAA Assumptions	£3.3m	£3.3m	£3.3m	£3.3m	£3.3m	£16.5m
(Under)/Overspend	(£0.4m)	£0.3m	(£0.2m)	-	-	