ACOG Airspace Change Organising Group

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ANNUAL REPORT APRIL 2025 – MARCH 2026

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

August 2026

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Chairman's Statement

The period covered by this final ACOG Annual Report was contextualised definitively by multiple, concurrent formal processes effecting major changes to the national policy framework, scope and delivery model for airspace modernisation in the UK, all of which posed a material risk of programme instability. The inherent and well-documented challenges in ACOG's prescribed facilitation role, devoid as it has been of any substantive levers of power to drive the required changes and administered to a diverse population of stakeholders right across the policy to delivery spectrum, including some at times motivated by their individual commercial imperatives, were therefore amplified.

ACOG's primary success during the period lies of course in spanning the activities that have continued to push airspace modernisation forward in the regions outside the South-East whilst simultaneously informing the design and preparation for a seamless transition to a new national operating model. However, recognising the acute need for and unilaterally undertaking a much more direct role in shepherding failing ACP sponsors through CAP1616's delivery milestones should also be registered in the credit column as it was not only commendable, but was undoubtedly the foundation for sustained momentum across the programme during this critical period. This Report captures the above perspectives in worthwhile detail.

A comprehensive haul-down report card for ACOG's contribution over the six years it has operated will be presented separately. Suffice to say here that the structures, programme management capability, engagement transparency, process discipline, tools, relationships and trust the Group built amidst a wickedly complex operating environment have created a very solid launch platform for its successors.

My thanks and those of the wider Steering Committee must go to Hd of ACOG and the whole ACOG team for their commitment, competency, diligence and passion for airspace modernisation throughout their tenure. They hand on the UK's airspace modernisation baton to their successors with hard won, highly evident and sustainable momentum.

Sir Timo Anderson KCB DSO
Chair, ACOG Steering Committee

Head of ACOG's Statement

This report marks both a year of delivery and ACOG's final Annual Report ahead of transition into the UK's future airspace coordination services within NATS. In 2025/26, ACOG maintained momentum across live clusters while supporting a fundamental shift in delivery arrangements. In Scotland, targeted intervention enabled Edinburgh Airport to reach Stage 3 gateway readiness and supported the first coordinated cluster consultation, demonstrating a step change in how complex, interdependent airspace change can be delivered and explained. In Northern England, we refined the MTMA system-wide design, supported Leeds Bradford's Stage 2 resubmission, and established a more credible pathway to consultation and deployment.

Across the programme, improvements to analytical methods and the development of tools such as the Flight Path Design Visual Repository strengthened the quality and clarity of evidence as the programme moves into consultation and decision phases. Alongside this, ACOG played a central role in preparing for UKADS and shaping the future UKACS model, ensuring existing work continued and earlier progress was protected.

Over the past six years, ACOG has brought structure and coherence to a fragmented system. The Airspace Change Masterplan created a shared framework for clustering interdependent proposals, sequencing delivery and enabling system-wide design decisions. Our coordination model, combining programme integration, technical support and stakeholder engagement, has evolved into a practical delivery capability where it is most needed. As a result, the programme has moved from planning into delivery: with maturing designs, live consultations and clearer implementation pathways. The foundations now in place, tools, governance, relationships and shared methods, will endure beyond ACOG. As ACOG transitions into UKACS, the need for strong coordination increases as consultation, regulatory decision-making and deployment begin to converge. Priorities for the next phase are clear:

- sustaining the tangible momentum in airspace modernisation as the delivery phase commences;
- embedding consistent analytical standards and tools; and
- maintaining stakeholder confidence through effective engagement and continuity of service.

While risks remain, they are better understood and more actively managed than at any point to date. ACOG was established to bring order to complexity and enable a coordinated national programme. That foundation is now in place. The task ahead is to carry that momentum forward into delivery.

Mark Swan
Head of the Airspace Change Organising Group

1. Introduction

1.1. Overview of Airspace Modernisation

1. Aviation is essential to the UK's economic, social and strategic life. It connects people and markets, supports trade and tourism, underpins national resilience and enables a wide range of civil and military activities.
2. The airspace system on which those activities and their associated benefits depend was largely designed for an earlier era. Traffic demand has increased significantly, aircraft performance has improved and the mix of airspace users is becoming more diverse, while much of the airspace structure and route network, particularly in busy terminal areas still reflect the legacy design. The Airspace Change Programme coordinated by ACOG remains a strategically important national endeavour by which the UK is responding to that gap.
3. UK airspace change is not simply a technical redesign exercise. It is a national infrastructure programme that must balance safety, operational efficiency, environmental performance, resilience and community impacts. The Airspace Modernisation Strategy (AMS) continues to provide the strategic framework for the programme, but 2025/26 showed more clearly than ever that delivery depends on strong coordination as well as clear policy direction. Progress in the programme's key clusters, the refinement of integrated system-wide proposals, the preparation for consultation and the reform of the airspace change delivery model itself all had to move forward together.
4. During the year, that progress was most visible in Scotland and Northern England through the ACOG coordinated activities of the ScTMA and MTMA programme clusters.[1] In the ScTMA cluster, ACOG took the initiative to step outside the Group's facilitation remit and provided targeted specialist support directly to Edinburgh Airport's Airspace Change Proposal (ACP). This was necessary to protect schedule and enable completion of the Stage 3 regulatory gateway process in preparation for public consultation in collaboration with Glasgow Airport and NATS. ACOG's technical support to Edinburgh Airport and the wider ScTMA cluster covered the consultation strategy, consultation materials, development of the Full Options Appraisal (FOA) and the preparation of technical charts showing options and expected impacts.
5. ACOG also developed coordinated, cluster-wide summary materials for the Scottish Airspace Modernisation public consultation and supported the consultation itself, including through targeted political engagement. In Northern England, ACOG continued to refine the MTMA system-wide proposals across Manchester, East Midlands, Liverpool John Lennon and Leeds Bradford Airport, working in collaboration with NATS so that the overall design remains safe and efficient.
6. Building on the success of the Group's efforts in the ScTMA, the same delivery focus was evident in the direct support provided to Leeds Bradford Airport during the second half of the year as it progressed its Stage 2 regulatory gateway rework and resubmission, and in ACOG's wider technical and enabling activities in the West cluster and the Southeast. This included work with the regulator to inform and move forward guidance for vertical interactions using more advanced performance-based navigation (PBN) procedures (known as CAGVI) and support for the development of the ACOG-sponsored and owned Flight Path Design Visual Repository (DVR), a novel platform developed to help improve how airspace interdependencies, options and

[1] ScTMA – Scottish Terminal Control Area. MTMA – Manchester Terminal Control Area.

expected impacts can be understood by diverse audiences across complex, overlapping ACPs.

7. The wider policy context for the UK Airspace Change Programme and ACOG's core functions changed materially during 2025/26. In March 2025, the Government confirmed that it would establish the UK Airspace Design Service (UKADS), with NATS (En Route) plc (NERL) tasked with providing UKADS and the initial focus placed on modernising the complex airspace in the Southeast cluster of the programme, including the future airspace changes required for Heathrow expansion. In October 2025, the Government launched its review of the Airports National Policy Statement (ANPS). During the same period, DfT and the CAA consulted on changes to NERL's licence, the Air Navigation Directions and Guidance, the CAP1616 airspace change process, and the guidance for the new UK Airspace Coordination Service (UKACS). Together, those changes reshaped the context in which the programme will now be delivered.

8. Against that highly dynamic backdrop, ACOG maintained a keen focus on safeguarding earlier outcomes and maintaining programme progress, not least by supporting the transition of the Southeast cluster from the previous sponsor-led, cluster-based approach towards a programme aligned with UKADS and the evolving ANPS review. That included work on the approach to onboarding existing Southeast cluster ACPs into UKADS and reprogramming the planned London Airspace South deployment to align with a UKADS-sponsored Single LTMA ACP, laying the foundations for the next phase of the programme.

1.2. Introduction to ACOG, the Masterplan and the Programme

9. ACOG was established to provide the coordinating centre of the UK Future Airspace Strategy Implementation programme for airports terminal and higher level NATS Enroute airspace modernisation. Its role has been to bring together the technical, programme management and communications disciplines needed to support strategically important, interdependent ACPs and to develop the Airspace Change Masterplan as the framework through which those changes could be aligned at national and regional (cluster) level. ACOG has operated as a ring-fenced function within NERL, with oversight provided through the ACOG Steering Committee and within the wider policy and regulatory framework set by the DfT and the CAA.

10. The Airspace Change Masterplan has been central to that model. Developed in iterations broadly aligned to the CAP1616 airspace change process, it has provided the mechanism for grouping ACPs into regional clusters, identifying their interdependencies, sequencing development and deployment activity, and ensuring that individual sponsors do not progress important changes in isolation. Over time, it has given the programme a shared structure for considering system-wide design choices, trade-offs and cumulative impacts before the interdependent ACPs enter into the public consultation and regulatory decision-making process.

11. Notwithstanding, during 2025/26, ACOG's role began to change. The Government and CAA moved from consultation to implementation of UKADS for London and the Southeast, and the CAA consulted on UKACS as the new coordination service to be provided by NERL in place of the functions currently delivered through ACOG. Under the new model, UKADS will consolidate the existing Southeast cluster ACPs into a Single LTMA ACP, while UKACS will provide the coordination service for strategically important, interdependent ACPs outside the scope of UKADS. In March 2026, the CAA published the outcomes of the autumn 2025 consultations on UKADS and UKACS

guidance and on the requirements for UKACS. That shift changed ACOG's scope, but it did not remove the need for extensive programme coordination outside of the Southeast cluster.

12. During the year, ACOG supported the co-sponsors in shaping the new model and helped translate policy reform into practical programme planning. In the Southeast, that meant helping to manage the transition from the former cluster structure to a programme aligned with the emerging UKADS organisation. In Scotland and Northern England, it meant maintaining momentum on the ScTMA and MTMA component ACPs and preserving the coherence of the wider programme while the new arrangements were being designed. By the end of the year, ACOG was operating both as the coordinator of the existing programme clusters (outside the Southeast) and as the practical foundation for the UKACS delivery model that will succeed it.

1.3. ACOG Governance Arrangements

13. ACOG's governance arrangements demonstrated their importance and value during 2025/26. The DfT and the CAA, as co-sponsors of airspace modernisation, set the policy direction and regulatory expectations for the programme. Within that framework, the ACOG Steering Committee continued to provide independent oversight, challenge and advice to ACOG and to other external stakeholders. That role was particularly important in a year when ACOG had to deliver live cluster work to keep the existing programme on track, while also preparing for a transition to the UKADS and UKACS delivery model.

14. The Steering Committee's contribution during the year was not limited to oversight and assurance. It helped provide stability and direction when the programme was under pressure. That included supporting ACOG's work to recover progress in Scotland, overseeing the move towards coordinated consultation activity, challenging proposed changes to MTMA integration and helping the organisation respond to the policy and delivery implications of UKADS and UKACS. It also continued to offer the co-sponsors a structured route for advice on funding pressures, specialist resource needs, deployment sequencing and prioritisation, and wider programme risks.

15. The governance model helped preserve discipline during a year of change. ACOG continued to work within established arrangements for risk management, quality assurance and reporting, including regular engagement with the co-sponsors and wider stakeholder forums. Looking ahead, the governance model is set to evolve rather than be replaced through the transition to UKADS and UKACS. The CAA's consultations on draft guidance for UKADS and UKACS envisaged a framework built around a strategic delivery plan, a stakeholder engagement plan, an Advisory Board and continuing oversight through the AMS governance structure, supported by information and reporting obligations to DfT and the CAA. That is a different formal model from the one under which ACOG was originally established, but it builds on many of the same principles: clear accountability, structured co-sponsor oversight, transparent engagement and strong assurance.

1.4. ACOG's role and functions

16. Since its establishment, ACOG has performed a distinct role within UK aviation. It has not replaced the responsibilities of ACP sponsors, nor has it acted as the decision-maker on airspace changes. Its main purpose has been to coordinate the programme of works around those sponsors and decisions: aligning timelines, managing

interdependencies, evaluating cumulative impacts, joining up consultation plans and helping ensure that strategically important ACPs are developed as part of a coherent national programme rather than as disconnected regional projects.

17. That is why ACOG is well placed to evolve into UKACS. The formal policy model is that NERL will provide UKADS to deliver airspace change in the Southeast cluster and the coordination service, UKACS, to coordinate the strategically important, interdependent ACPs outside that scope, while NERL and the airports continue to sponsor those ACPs. The ACOG team already holds the programme knowledge, sponsor relationships, technical and regulatory understanding and analytical capability needed to provide the coordination services. The team is familiar with the key, programme delivery risks and how to support sponsors at the points where strong coordination is required.

18. For the next phase of the programme, those clusters outside the scope of UKADS will still require strong coordination across multiple sponsors, clear sequencing of milestones, joined-up consultation and post-consultation support, integrated technical support and a route for identifying and resolving cross-cutting issues. The functions that ACOG has been performing successfully in the ScTMA and MTMA, specifically programme integration, interdependency management, stakeholder coordination, analytical support and delivery assurance are all likely therefore to remain relevant.

2. Review of 2025/26 achievements and activities looking ahead to 2026/27

19. ACOG's objectives in table 1 provide a useful point of reference to consider the key achievements of 2025/26 and look ahead at the major activities for 2026/27.

20. 2025/26 was a year of both delivery and transition. ACOG maintained momentum in the live clusters, particularly in Scotland and Northern England, while also helping the co-sponsors and ACP sponsors prepare for the changes associated with UKADS and the future UKACS model. As a result, the year's work combined hands-on support to sponsors, cluster-level integration, consultation preparation, regulatory and policy engagement and early transition planning for the new delivery model.

21. Tables 2 to 5 are organised around the same themes: ScTMA, MTMA, policy and service transition, and cross-cutting tools and methods. This shows how progress built from quarter to quarter and how activity in one area supported progress in the others.

TABLE 1: ACOG's OBJECTIVES

1.	Lead the creation of a credible and implementable 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 programme

22. Leading the creation of a credible and implementable programme remained a core ACOG objective in 2025/26, but the work was shaped less by the production of new standalone planning artefacts and more by keeping interdependent ACPs moving through the right gateways at the right pace. In practice, that meant targeted intervention where delay in one proposal would affect the wider cluster, especially in Scotland and Northern England. ACOG supported Edinburgh Airport through the work needed to complete Stage 3, coordinated the related updates to other Scottish cluster ACP materials, refined the MTMA system-wide design and successfully supported Leeds Bradford Airport's Stage 2 resubmission.

23. The year also showed that the ACOG function had become as much about maintaining programme coherence through change as it was about setting direction. Alongside live cluster support, ACOG worked with the co-sponsors and ACP sponsors on the implications of Heathrow expansion related policy changes, the UKADS initiative, updated funding assumptions, CAP1616 reform and the emerging UKACS model. Table 2 summarises the main achievements by theme and suggests key activities to

bridge the transition to UKACS in Q2 2026 and sustain airspace modernisation momentum.

TABLE 2: Achievements and activities looking ahead

Theme	25/26 achievements and 26/27 activities lookahead
SCOTLAND **(ScTMA)**	Q1: April to June 2025 **Targeted specialist support to Edinburgh Airport's Stage 3 gateway readiness, including consultation strategy development, audience mapping, consultation document updates and advice on the practical submission approach, while keeping alignment with Glasgow and NERL interfaces.** Q2: July to September 2025 **Supported completion of the revised Edinburgh Stage 3 submission and refreshed Scottish cluster material to remain aligned with the resubmission, including updates to Iteration 3 of the Masterplan for the Scotland.** Q3: October to December 2025 **Supported sponsors to complete post-Gateway actions and developed ScTMA deployment scenarios, including testing a faster deployment pathway and its implications for sequencing and delivery.** Q4: January to March 2026 **Coordinated cross-sponsor activity through the live ScTMA consultation period, including issue management, communications activity and preparation for post-consultation analysis.** **Prospective activities 2026/27** **a) Complete consultation analysis and support refinement of the cluster proposal.** **b) Update sequencing and deployment assumptions in light of consultation feedback and process reform.** c) **Transfer residual Scottish coordination functions into UKACS in Q2 2026.**
NORTHERN ENGLAND (MTMA)	Q1: April to June 2025 **Re-engaged with NERL on the refined approach to MTMA system-wide design and deployment sequencing, establishing a firmer basis for the next phase of cluster planning.** Q2: July to September 2025 **Extended the deployment planning work to airport ACP sponsors and reviewed the deployment programme and FOA approach to maintain coherence as sponsor timelines and dependencies became clearer.** Q3: October to December 2025 **Intervened to support development of Leeds Bradford Airport's Stage 2 resubmission with additional information and recommendations and**

	tested the implications of Leeds Bradford interdependencies within the broader MTMA programme timeline scenarios. **Provided advice to the co-sponsors on the treatment of the ACP required to support the reopening of Doncaster Sheffield Airport and its alignment with the wider MTMA cluster.** Q4: January to March 2026 **Developed an updated MTMA baseline deployment plan reflecting likely 2026 process and policy changes and creating a more credible pathway to 2030**. **Prospective activities lookahead 2026/27** a) Support coordinated FOA development and cumulative impact analysis across the MTMA sponsors. b) Develop the cluster consultation strategy, shared narrative and regulatory gateway submission plan. c) Transition ongoing MTMA coordination into UKACS in Q2 2026.
THE WEST	Q1: April to June 2025 **Bristol Airport and NERL successfully completed the development simulation phase, and Exeter was formally removed from the programme, narrowing the focus of the design work. The main issue identified was Bristol Airport's proposed runway extension, which could require some design and assessment work to be revisited, with potential implications for programme time and cost.** Q2: July to September 2025 **A September planning session reset the programme baseline and brought the sponsors into alignment around a revised September 2026 target for the Consult regulatory gateway. During this period, the main outstanding risk became the proposed runway extension, which could require further analysis and may affect later programme timescales.** Q3: October to December 2025 **ACOG supported the delivery of a successful Air Traffic Control simulation for the West Cluster, along with associated safety assurance activities and coordinated the development of an agreed plan to progress to a public consultation on the system-wide design from Q4-2026.** Q4: January to March 2026 **Bristol Airport requested that the proposed runway extension programme be incorporated into the West Cluster scope, requiring the programme to pause while the implications were assessed. NSL subsequently provided Bristol Airport with an impact assessment and proposed contract variation for approval, with work remaining on hold pending sign-off.** **Prospective activities lookahead 2026/27** As of April 26, Bristol Airport has restarted the project and are working on updating the designs to include the runway extension. This will be

	completed in at the end of August 2026, with NERL anticipated to also mobilise from September 2026.
POLICY AND SERVICE TRANSITION	Q1: April to June 2025 **Reviewed London Airspace South deployment planning with Gatwick and NERL in response to Government support for Heathrow expansion and began assessing the implications for the wider programme.** Q2: July to September 2025 **Validated sponsor financial data against UKADS Regulatory Impact Assessment assumptions and finalised advice to the co-sponsors on funding models for programme ACPs outside the southeast.** Q3: October to December 2025 **Supported engagement with the CAA on residual functions outside UKADS and assessed the implications of CAP1616, Air Navigation Guidance and funding changes for live cluster plans and co-sponsor messaging.** Q4: January to March 2026 **Contributed to early scoping of ACOG's evolution into UKACS, completed the ACOG transition plan and provided advice on changes to Air Navigation Directions, Guidance and funding eligibility** **Prospective activities lookahead 2026/27** a) Support definition of UKACS scope, governance and reporting arrangements. b) Support handover interfaces between UKADS and the residual coordination service. c) Rebaseline the non-UKADS programme against the new service model and funding framework.
CROSS-CUTTING TOOLS AND METHODS	Q1: April to June 2025 **Reviewed Scottish cluster material for alignment with Masterplan Iteration 3 and developed a clear evidence base regarding sponsor funding pressures, resource constraints and deployment planning assumptions.** Q2: July to September 2025 **Published the Masterplan Iteration 3 for Scotland as the common baseline for consultation planning, system wide design and programme assurance.** Q3: October to December 2025 **Conducted detailed review of the CAA consultation on a revised airspace change process and supported ACOG's formal response so live cluster plans could adapt to the emerging process.** Q4: January to March 2026

	Consolidated lessons from consultation planning, funding analysis and policy reform into a clearer model for residual coordination outside the UKADS scope. **Prospective activities lookahead 2026/27** a) Maintain a single integrated view of milestones, dependencies and affordability across the remaining clusters. b) Refresh programme planning and cumulative impact assessment templates, tools and assumptions to reflect updated guidance. c) Make available methods and data to UKACS in Q2 2026.
ACOG QUALITY MANAGEMENT SYSTEM	April 2025 to March 2026 The ACOG Quality Management System (QMS) has achieved all its objectives set at the start of 2025 and has managed to keep its maturity level at the same score whilst at the same time striving towards the highest one possible. ACOG has once again had a successful ISO 9001 audit with no findings for the year 2025 with ACOG's Top Management found to be committed and involved in the QMS. The QMS is well embedded into the business, is managed effectively and is compliant with the relevant standards required. Nonconformities are well analysed and effective corrective actions are put in place. A mature, well-governed QMS underpins ACOG's ability to lead a credible and implementable programme, providing ACP sponsors with confidence that the processes, controls and decision-making frameworks guiding coordination and delivery are robust, consistent and externally assured. **Prospective activities lookahead 2026/27** ACOG's anticipated Q1/Q2 2027 goals include the amalgamation of the ACOG QMS into the UKACS model, working on strengthening the Root Cause Analysis and identifying any internal and external issues that would affect the QMS under the new UKACS delivery plan. This internal rigour has translated directly into the quality of ACOG's engagement with sponsors, ensuring that guidance, technical advice and delivery coordination are grounded in repeatable, auditable practice, strengthening the coherence of the programme.

2.2. Coordinate optimised airspace design decisions

24. In 2025/26, ACOG's second objective became more practical and more systemic. Design coordination was not limited to identifying interdependencies on paper. It involved resolving them across the evolving ACPs, supporting the development of emerging regulatory guidance, and ensuring that sequencing and prioritisation decisions remained workable as policy and process changed around the programme. This was most visible in the MTMA cluster, where ACOG worked with NERL and airport sponsors to refine the overall design and deployment plan, and in Scotland, where gateway recovery work at Edinburgh needed to remain aligned with the wider cluster.

25. At the same time, ACOG supported the co-sponsors on issues that will shape how future design decisions are coordinated, including guidance on vertical interactions, proportionality in regulatory interfaces and the implications of UKADS and UKACS for the programme clusters. Table 3 summarises the outcomes achieved in the past year and suggests key activities to bridge the transition to UKACS in Q2 2026 and sustain airspace modernisation momentum.

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

Theme	25/26 achievements and 26/27 activities lookahead
AIRSPACE DESIGN **SCOTLAND** **(ScTMA)**	Q1: April to June 2025 **Supported the practical realignment of Edinburgh gateway recovery work with the Glasgow and NERL proposals so the Scottish cluster design remained coherent while Stage 3 material was revised.** Q2: July to September 2025 **Maintained design assurance on the Scottish cluster material, including how updated options, route interactions and expected operational effects were represented across sponsor and cluster-wide documents.** Q3: October to December 2025 **Developed and tested ScTMA deployment scenarios, including a fast-track option, to understand feasibility, dependencies and sequencing once the cluster moved beyond the Gateway stage.** Q4: January to March 2026 **Used live consultation delivery and emerging process changes to identify remaining cross-sponsor design issues and resolve them in a coordinated way.** **Prospective activities lookahead 2026/27** **a) Maintain a single design baseline through consultation analysis and post-consultation refinement.** **b) Apply emerging CAA guidance on vertical interactions and other design interfaces across the cluster.** **c) Make available these coordination disciplines for UKACS from Q3 2026.**

NORTHERN ENGLAND (MTMA)	Q1: April to June 2025 **Supported engagement with NERL on the approach to refining the MTMA system-wide design and establishing a more structured basis for sponsor coordination.** Q2: July to September 2025 **Extended that engagement to airport sponsors and reviewed the cluster deployment programme and FOA approach so design decisions and sequencing remained aligned.** Q3: October to December 2025 **Contributed to the development of Leeds Bradford's Stage 2 resubmission and assessed the implications of Doncaster Sheffield Airport's planned reopening and wider timeline scenarios for cluster integration.** Q4: January to March 2026 **Refined the MTMA deployment plan and produced an updated baseline plan reflecting likely 2026 process and policy changes, giving sponsors a clearer route towards implementation.** **Prospective activities lookahead 2026/27** **a) Finalise a stable system-wide MTMA design proposal.** **b) Align sponsor FOAs, safety assumptions and consultation sequencing.** **c) Transfer MTMA design coordination into UKACS from Q2 2026.**
POLICY AND SERVICE TRANSITION	Q1: April to June 2025 **Provided immediate design coordination support in response to the UKADS transition announcement, focusing on the implications for interdependent work outside the Southeast.** Q2: July to September 2025 **Began assessing how UKADS onboarding and draft UKACS arrangements could affect sponsor roles, design interfaces and coordination responsibilities in the non-UKADS clusters.** Q3: October to December 2025 **Contributed to wider shared services and transition discussions, including early thinking on how design coordination functions would sit within UKACS.** Q4: January to March 2026 **Reviewed draft UKACS guidance and the UKADS onboarding approach, including potential implications for MTMA and ScTMA ACPs and future interfaces between services.** **Prospective activities lookahead 2026/27** **a) Support development of governance interfaces between UKADS and UKACS.** **b) Retain sponsor accountability while ensuring system-wide dependencies are actively managed during the transition.**

	c) **Support seamless UKADS/ACS implementation, minimising impact on live cluster work.**
CROSS-CUTTING TOOLS AND METHODS	Q1: April to June 2025 **Supported regulatory engagement on the development of CAA guidance on vertical interactions and reviewed ACOG advice on IFP regulatory risk and proportionality.** Q2: July to September 2025 **Continued using regulatory engagement to test how emerging guidance could be applied in live clusters, especially where more advanced PBN procedures increased vertical complexity.** Q3: October to December 2025 **Connected design issues more directly to deployment feasibility through broader programme-plan review work, rather than considering them in isolation.** Q4: January to March 2026 **Brought guidance, programme planning and shared services work together into a more coherent model for system-wide design coordination under the future UKACS arrangements.** **Prospective activities lookahead 2026/27** a) **Support implementation of new or revised CAA guidance, particularly on vertical interactions.** b) **Support a refresh of design review methods to reflect CAP1616 and policy changes.**

2.3. Demonstrate the collective benefits and impacts

26. Demonstrating the collective benefits and impacts of airspace modernisation in 2025/26 was less about creating entirely new frameworks and more about applying and adapting ACOG's analytical tools to live programme needs. The year's work was therefore closely tied to delivery: improving the quality of evidence going into Edinburgh's FOA, refining the methodology and material needed for the MTMA cluster, and developing the Digital Visual Repository into a fully functioning support tool for consultation and regulatory approvals.

27. The overall AMS programme is now moving into phases where the quality, consistency and usability of evidence will shape both the efficiency of the regulatory gateway process and the confidence of external stakeholders at public consultation. ACOG also used the year to test how emerging policy and guidance changes could affect the way benefits, impacts and trade-offs are described. Table 4 summarises the main outcomes and suggests key activities to bridge the transition to UKACS in Q2 2026 and sustain airspace modernisation momentum.

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

Theme	25/26 achievements and 26/27 activities lookahead
SCOTLAND (ScTMA)	Q1: April to June 2025 **Supported development of operational maps and technical charts for Edinburgh's updated FOA and carried out quality and compliance review of the revised evidence base.** Q2: July to September 2025 **Produced additional technical charts for the FOA and worked directly with Edinburgh Airport teams to resolve discrepancies in the revised appraisal.** Q3: October to December 2025 **Used the improved evidence base to support wider Scottish consultation material and to ensure expected impacts were presented consistently across sponsor and cluster documents.** Q4: January to March 2026 **Applied live consultation experience to identify where further refinement, or clearer explanation of expected impacts, would be needed in the next phase.** **Prospective activities lookahead 2026/27** **a) Support consultation response analysis and refinement of cluster-level benefits and impacts.** **b) Update charts, appraisal material and explanatory products to support post-consultation work.** **c) Ensure UKACS inherits a usable Scottish evidence base.**
NORTHERN ENGLAND (MTMA)	Q1: April to June 2025 **Began shaping the evidence needs for the MTMA cluster by linking design refinement to the future FOA approach**

	Q2: July to September 2025 **Refined the MTMA FOA methodology so it better reflected programme objectives, interdependencies and stakeholder expectations** Q3: October to December 2025 **Supported development of an MTMA flight path design visualisation and defined work packages for DVR support to the coordinated consultation workstream.** Q4: January to March 2026 **Expanded the DVR capability into a stronger platform for consultation and regulatory approvals, helping create a more coherent evidence base across the cluster.** **Prospective activities lookahead 2026/27** **a) Complete consultation-ready visualisations and analytical products for MTMA sponsors.** **b) Strengthen cumulative analysis and shared assumptions across sponsor FOAs.** **c) Maintain common evidence standards across the cluster from Q3 2026.**
POLICY AND SERVICE TRANSITION	Q1: April to June 2025 **Began testing how the analytical support model would need to adapt as UKADS and UKACS emerged, including the likely evidence requirements for non-UKADS clusters.** Q2: July to September 2025 **Reviewed proposed changes to Air Navigation Guidance and Directions to understand the implications for how ScTMA and MTMA benefits, impacts and trade-offs should be described.** Q3: October to December 2025 **Used the above review to shape future analytical support so evidence products would remain compatible with the evolving policy framework.** Q4: January to March 2026 **Supported review and application of emerging CAA advice on vertical interactions between PBN procedures, helping ensure analytical material remained technically relevant.** **Prospective activities lookahead 2026/27** **a) Align evidence templates and explanatory material with updated guidance.** **b) Provide a consistent analytical offer across the non-UKADS clusters.** **c) Offer the evidence, visualisation and appraisal functions to UKACS during mobilisation.**
CROSS-CUTTING	Q1: April to June 2025

TOOLS AND METHODS	**Continued developing the ACOG Delivery Services Framework and related analytical support arrangements so specialist products could be deployed more quickly where sponsors needed them most.** Q2: July to September 2025 **Scoped and defined updates to the Flight Path Design Visual Repository, including how it could better support sponsor engagement, cluster-wide consultations and regulatory workflows.** Q3: October to December 2025 **Took forward the strategic scoping of DVR enhancement so it could evolve from a design visualisation tool into a broader consultation support asset.** Q4: January to March 2026 **Refined and expanded the DVR into a more practical consultation support and regulatory approvals platform.** **Prospective activities lookahead 2026/27** **a) Move to the next phase of DVR enhancement, including consultation and approvals functionality.** **b) Improve integration between charts, mapping and narrative material used in consultations.** **c) Offer the toolset to UKACS to provide a shared service for the residual clusters and streamline consultations.**

2.4. Stakeholder communications and engagement

28. ACOG's fourth objective, building support for airspace modernisation and joining up sponsor consultation activity, became more delivery-focused during 2025/26. In Scotland, the priority was to turn coordinated consultation from a planning concept into a working model through revised consultation strategies, shared cluster materials, explainer content and structured issue management during the live consultation period. Alongside that, ACOG maintained engagement with industry and government stakeholders through NATMAC, ICAMS and direct co-sponsor briefings, while helping to explain the programme implications of UKADS and the emerging UKACS model.

29. This work reinforced a wider lesson from the year. Coordination is most effective when the technical, programme and communications strands are developed together. Looking ahead to 2026/27, the engagement challenge will be twofold. ACOG, and then UKACS, will need to support forthcoming consultations in the non-UKADS clusters, while also giving sponsors, stakeholders and communities a clear explanation of what the service transition means in practice. Table 5 summarises the main achievements and suggests key activities to bridge the transition to UKACS in Q2 2026 and sustain airspace modernisation momentum.

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

Theme	25/26 achievements and 26/27 activities lookahead
SCOTLAND (ScTMA)	Q1: April to June 2025 **Drafted Edinburgh Airport's revised consultation strategy, refined key sections of the consultation document and updated the ScTMA coordinated consultation framework.** Q2: July to September 2025 **Refined cluster-wide consultation materials, planned a system-wide airspace design explainer video and prepared the shared assets needed to support the launch of coordinated consultation.** **Engaged with the Scotland Chambers of Commerce to support awareness of the upcoming consultation.** **Co-hosted two drop-in events with NATS (in Holyrood and Portcullis House) for MPs to hear updates on the UK's airspace modernisation programme.** Q3: October to December 2025 **Provided planning and coordination support through the ScTMA coordinated consultation, including alignment with the regulatory airspace change process and targeted political engagement.** **Provided briefings to MPs, MSPs, and members of the Cross-Party Group on Aviation following the launch of the Scotland consultation, explaining its connection to the national picture.** Q4: January to March 2026 **Coordinated communications, engagement and consultation activity and implemented a lessons-learned framework, including mid-point review and issue resolution.**

	Prospective activities lookahead 2026/27 a) Support close-out of the consultation and reporting of the key issues raised. b) Refresh the coordinated consultation approach to reflect lessons learned and any process changes. c) Handover the remaining Scottish engagement and consultation support functions to UKACS from Q2 2026.
NORTHERN ENGLAND (MTMA)	Q1: April to June 2025 Maintained sponsor engagement while MTMA design and programme assumptions were being reset, helping keep airports aligned around the cluster narrative. Q2: July to September 2025 Began shaping the consultation story for MTMA by linking design refinement to consultation planning and wider programme messaging. Q3: October to December 2025 Engaged with Leeds Bradford and other sponsors on submission support, programme phasing and the implications of cost, funding and efficiency constraints. Q4: January to March 2026 Explored costed options and efficiency opportunities for the MTMA programme, including engagement with airports on funding arrangements. Prospective activities lookahead 2026/27 a) Develop a cluster-wide consultation strategy and shared public narrative for MTMA. b) Prepare coordinated stakeholder, political and industry briefings ahead of consultation. c) Offer the sponsor-facing engagement model for transfer into UKACS.
POLICY AND SERVICE TRANSITION	Q1: April to June 2025 Prepared ACOG briefings for the July 2025 ICAMS and NATMAC meetings so external stakeholders had a clearer picture of programme priorities and the changing policy context. Q2: July to September 2025 Developed further NATMAC and industry briefing material as the consultation and transition agenda became more defined. Engaged with both the previous Aviation Minister, Mike Kane MP, and current Aviation Minister, Keir Mather MP, maintaining ongoing dialogue on the programme. Q3: October to December 2025 Prepared ACOG's response on the proposed scope and functions of UKACS and supported briefing for the November ICAMS meeting.

	Q4: January to March 2026 **Helped shape co-sponsor, sponsor and ministerial messaging on CAP1616, Air Navigation Guidance, funding and the transition to the new service model.** **Prospective activities lookahead 2026/27** **a) Explain the practical implications of UKADS and UKACS more clearly to sponsors and external stakeholders.** **b) Support co-sponsor and industry engagement during UKACS mobilisation.** **c) Maintain confidence in continuity of coordination through the transition period.**
CROSS-CUTTING TOOLS AND METHODS	Q1: April to June 2025 **Used briefing materials and consultation framework updates to bring technical, programme and communications strands closer together.** Q2: July to September 2025 **Supported development of shared explanatory products, including the proposed explainer video, to improve how the coordinated design story could be communicated.** Q3: October to December 2025 **Delivered a ScTMA consultation lessons-learned framework so emerging issues could be captured and addressed while consultation was still live.** Q4: January to March 2026 **Used those lessons, together with sponsor feedback, to inform a more practical engagement model for future coordinated consultations and the future UKACS role.** **Prospective activities lookahead 2026/27** **a) Update templates, briefing packs and explainer materials for use across the remaining clusters.** **b) Embed lessons learned into future coordinated consultation planning.** **c) Build a durable stakeholder engagement offer within UKACS.**
DIGITAL ENGAGEMENT	April 2025 to March 2026 **Continued a drumbeat of content across the ACOG digital channels, sharing programme updates and key statistics, which received solid engagement.** **Delivered three newsletters, with the March 2026 edition seeing the second highest open and click rate to date.** **Continued to grow the ACOG LinkedIn presence with new followers and posts generating nearly 13,000 impressions and over 330 reactions.**

3. Risks to the Programme

30. During the reporting period, ACOG's risk management approach continued to operate across two complementary levels: longer-term horizon risk monitoring and active programme risk management. Both also provide scope to identify and respond to emerging opportunities. The horizon risk element focuses on broader issues that may influence the overall success of airspace modernisation but sit largely outside ACOG's direct remit. These matters typically relate to the wider policy, regulatory and environmental context and therefore require close engagement with those organisations best placed to lead mitigation, including the AMS co-sponsors DfT and CAA. In this context, ACOG has continued to play an important coordinating and convening role in supporting risk identification, visibility and collaborative management as responsibilities evolve through the transition to UKADS and ACS.

31. The ACOG Steering Committee has continued to review the strategic risk picture on a regular basis in order to consider the most appropriate management response and maintain visibility of matters that may affect delivery over the longer term. While many of these risks are not directly controllable within the programme, ACOG's regional cluster approach has helped to reduce potential impacts on delivery sequencing, interdependencies and benefits realisation. Where closer intervention has been considered necessary, ACOG has worked with stakeholders, including the CAA and DfT, to support the development of appropriate mitigations and next steps.

32. The second element of the framework relates to programme-level risks that directly affect delivery of the cluster deployment plans and ACOG's day-to-day activities. These risks have continued to be actively managed through ACOG's internal risk management processes. This approach was previously recognised through an independent ISO 9001 audit, which identified the ACOG team's risk management arrangements as an area of particular strength. The main horizon and programme risks are provided in Tables 6 and 7, together with an outline of the relevant management approach and transition considerations.

TABLE 6: Summary of horizon scanning risks and management approach

#	Horizon scanning risks	Management approach
1	**Fragmentation of delivery arising from uneven sponsor capability or constrained investment.** There remains a risk that some key delivery partners, are unable to develop or sustain sufficiently robust resource contributions to support coordinated delivery. In the absence of continued sponsor investment and resources, and where central support mechanisms remain uncertain, there is a risk that delivery becomes more fragmented, reducing the overall coherence and efficiency of airspace modernisation. This risk is heightened by variability in airport financial resilience and wider uncertainty around future funding arrangements.	ACOG has adopted a more proactive role during 2025/26, providing delivery services that directly support ACP sponsor activities, helping to relieve resource constraints and strengthen coordinated delivery. In parallel, ACOG's engagement with the AMS co-sponsors has secured the Airspace Design Support Fund, enabling sponsors to procure essential additional resources and address constraints linked to investment. As a result, this risk has reduced significantly, although it will

		continue to be monitored through the transition to the UKACS model.
2	**Wider airspace modernisation arrangements may not evolve quickly enough to support the integration of new airspace users.** While the Masterplan has focused on strategically important changes in congested terminal airspace, demand from new and emerging airspace users, including drones and advanced air mobility operators, continues to develop. Without a coherent and coordinated framework for integration, there is a risk of piecemeal solutions emerging that do not make best use of airspace, do not align with wider modernisation objectives, or create longer-term inefficiencies in the overall system.	ACOG has continued to identify and highlight integration risks and dependencies, helping ensure that the needs of a broad range of airspace users are considered. Through ongoing engagement with co-sponsors and stakeholders, ACOG has driven greater alignment between the airspace programme future operational concepts.
3	Changes in policy, legal context or delivery model could affect established design assumptions Future changes in environmental policy, regulatory processes or delivery structures may require the system-level design approach to be revisited. This could create a risk of design rework, delay and increased scrutiny of earlier trade-offs, particularly where priorities evolve in areas such as noise, carbon or the balance of impacts between communities. The transition to new delivery arrangements may also require clear continuity in how evidence, decisions and rationale are carried forward.	ACOG has strengthened the robustness and transparency of design decision-making through the continued development of its Cumulative Analysis Framework and associated assurance approaches. This has provided a more structured and traceable basis for trade-offs.
4	**Insufficient sector capacity could constrain timely and coordinated delivery** There remains a wider sector risk that limited availability of specialist resources across airports, ANSPs and the regulator could slow the delivery of airspace changes. Given the interconnected nature of the programme, delays affecting one part of the system may have knock-on effects elsewhere, reducing delivery efficiency and delaying the realisation of wider benefits.	ACOG has continued to work collaboratively across the sector to improve visibility of capacity constraints, identify pinch points and support forward planning. This has included engagement with sponsors, service providers and the CAA to help inform a more coordinated approach to resource planning.

TABLE 7: Summary of programme risks and management approach

#	Programme risks	Management approach
1	Increasing pressure on delivery timescales across clusters Delays arising from regulatory gateway timelines, sponsor funding constraints, planning dependencies or unforeseen design challenges may lead to increasing overlap between activities across different clusters. If multiple programmes begin to converge within the same delivery window, this could place strain on sector capacity and reduce flexibility in deployment planning, with potential implications for the timely realisation of wider programme benefits.	ACOG has continued to use rolling milestone tracking, forward planning and risk-based reforecasting to identify emerging delivery pressure at an early stage. It works closely with sponsors and the CAA to reset plans where necessary and has sought to maintain appropriate flexibility within cluster-level delivery plans to accommodate limited slippage where possible.
2	Uncertainty relating to future airport development plans in the Southeast The absence of a confirmed policy or scheme, timescales and decision points for potential airport expansion and related infrastructure changes in the Southeast continues to create uncertainty for programme planning. This can make it more difficult to define the appropriate scope, timing and design assumptions for interdependent airspace changes, increasing the risk that elements of the work may need to be revisited as wider airport plans become clearer.	ACOG has maintained close engagement with relevant airport sponsors and other key stakeholders in order to monitor developing plans and understand potential implications for the wider programme. This has helped support visibility of dependencies and informed ongoing consideration of how best to maintain alignment as the strategic context evolves.
3	**Transition to new delivery arrangements may affect continuity and pace of programme coordination** The introduction of the new delivery model, including the transition from ACOG to UKADS and related future service structures, may result in changes to roles, responsibilities and interfaces across the programme. While these changes are intended to support a stronger long-term delivery model, there is a risk that the transition period could create uncertainty, duplication or temporary loss of momentum if not carefully managed.	ACOG has continued to work closely with co-sponsors and delivery partners to support transition planning and maintain continuity of programme coordination. This has included contributing to the development of future arrangements and helping to ensure that key knowledge, data, processes and stakeholder interfaces are carried forward in an orderly and effective way.

4. Finance

33. During the reporting period, ACOG continued to operate with an agreed level of autonomy in discharging its coordination responsibilities and managing the budget available to support those activities. Funding has been provided through the NERL element of the UK en route unit rate, with financial oversight exercised through NERL's broader regulatory accountability framework. The budget covers ACOG's core resources, external supplier support and other programme-related expenditure. Certain enabling corporate services and overheads, such as accommodation, payroll and some resource support, continue to be provided by NERL and are therefore not separately reflected in this summary. In the context of the transition to UKADS and the wider future service model, these arrangements have provided an important foundation for continuity and the orderly transfer of functions.

34. Table 8 sets out the actual and forecast costs associated with ACOG's activities for the financial years 2023 to 2027, compared with the corresponding CAA planning assumptions.

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	£3.0m	£2.7m	£0.6m	£3.3m	£12.5m
CAA Assumptions	£3.3m	£3.3m	£3.3m	£3.3m	£3.3m	£16.5m
(Under)/Overspend	(£0.4m)	(£0.3m)	(£0.6m)	(£2.7m)	-	

*Figures are 2020 prices, calendar year