



AEF response to the DfT's consultation on the Air Navigation Directions and Air Navigation Guidance

January 2026

Aviation Environment Federation (AEF) is a UK-based national NGO that focuses on reducing aviation's environmental impact, particularly in terms of climate change, noise and air pollution. Internationally, we are a leading representative of the NGO grouping ICASA (the International Coalition for Sustainable Aviation) which has observer status to the UN's International Civil Aviation Organisation (ICAO).

We have an active membership comprising local community and amenity groups living under flight paths and around the UK's airports and airfields. The views of the membership were sought and taken into account when compiling this response.

Questions 3 – 6

The altitude-based priorities of the 2017 ANG include the following: "in the airspace at or above 4,000 feet to below 7,000 feet, the environmental priority should continue to be minimising the impact of aviation noise ... unless the CAA is satisfied that the evidence presented by the sponsor demonstrates this would disproportionately increase CO₂ emissions".

The 2026 ANG proposals remove this priority, stating: "Noise from aircraft flying at or above 4,000 feet is not a relevant consideration." A noise priority at only 4,000 feet is a very low bar and the new guidance seriously weakens protection for communities from noise impacts. The pretext for the change is that it's taking action on climate change. Yet the Government has produced no assessment of the quantity of CO₂ emissions that will be reduced by this change (the Options Assessment provides a visual illustration but no data), and appears to have reached a conclusion ahead of seeing that has been requested from sponsors and operators in consultation questions 40 and 41. Consequently, it is impossible to determine how it has arrived at this conclusion. Carbon

savings from optimised flight paths between 4,000 and 7,000 feet, when compared to several extra track miles potentially needed to fly noise optimised routes, are very likely to be minimal especially in the context of CO₂ emissions associated with the whole flight. Conversely, many more people may be impacted in some localities as a consequence of not prioritising noise up to 7,000 feet. This point is acknowledged in the Government's own evidence base published in the Options Assessment (page 38):

This may lead to airspace designs that prioritise efficiency or emissions reductions over noise mitigation in certain altitude bands (e.g. 4,000–7,000 feet). As a result, some communities could experience increased aviation noise, particularly if flight paths are adjusted to optimise fuel burn or capacity. While the policy encourages local flexibility and multiple route options to provide respite, the potential for increased noise exposure remains a concern, especially in densely populated or previously quieter areas. Households will be the main impacted group as a result of any revisions to flightpaths. These impacts have been deemed to be direct. Although they will not materialise immediately, i.e. not until subsequent airspace changes take effect, any noise impacts that do result are a direct consequence of changes to the guidance regarding Altitude Based Priorities.

The Annex in the Options Assessment also highlights the consequence of not considering noise above 4,000 feet. The Heathrow example shows that the 51Leq 16 hour contour would exclude 11% of the exposed population, or nearly 100,000 people, if a 4,000 feet cut off is applied. This is significant as people regularly report being impacted by aircraft noise at levels at 51 and 54 Leq 16 hour, or at 40 Leq 8 hour night. We also believe it is premature to reach a conclusion on this matter ahead of the publication of the CAA's recently conducted noise and annoyance survey.

It seems more likely from the evidence presented in the Options Assessment, that the real reason for the change is the desire to speed up progress on airspace change and airspace modernisation by making the process more efficient (minimising the number of options that need to be considered). However, it is communities that will bear the brunt. If the main motivation is to streamline the process, the main objective is to create certainty for sponsors and the CAA. This could equally be achieved by stating that noise is the principal design criteria up to 7,000 feet.

While we agree that reducing emissions is important, and efforts to decarbonise and reduce contrail formation should be accelerated, environmental trade-offs need to be balanced. There are relatively few ways to reduce aircraft noise exposure compared to the options available to reduce carbon emissions, and the potential, as yet unquantified,

savings from the short track miles between 4,000 and 7,000 feet are likely to be dwarfed by the contribution from wider operational efficiencies, alternative fuels and, appreciating that capacity increases risk cancelling out the saving that can be made, placing a cap on flight numbers.

Regarding capacity increases, the new guidance seeks repeatedly to place responsibility for increased capacity and associated increases in CO₂ emissions elsewhere, especially with the planning system. For example, it states that “changes to airspace design on their own will not lead to increased numbers of air traffic movements. The number of flights to, from and over the UK is set by a number of factors, including the planning process which governs airport runway or terminal capacity.” This is splitting hairs. The Airspace Modernisation Strategy, to which the new guide appropriately refers, states: “The vision is to deliver quicker, quieter and cleaner journeys and more capacity”. Delivering more capacity is clearly a strategic aim of the AMS, of which airspace change proposals are a key part. It also assumes that local authorities have the ability and resources to understand aviation operational issues sufficiently to make informed decisions, and assumes that increases in traffic are always the result of a planning application when some airports may not have any conditions on passenger or movement numbers and/or fall back on permitted or established use rights.

The new guidance also states: “planning decisions are likely to have a greater impact on carbon emissions from aviation than from the airspace change decisions. The aim of the airspace change process is to deliver airspace improvements within the capacity or other limits set by any planning decision that increasing capacity as part of airspace changes, will not.” Plainly, airspace modernisation and airspace change clear the way for airport expansion and are thus jointly implicated in the carbon emissions that result, especially where they anticipate future expansions that have not yet been formally approved. In addition, the purpose of airspace modernisation is not to deliver improvements; it is explicitly to redesign airspace to unlock growth.

Question 29

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

AEF is a strong supporter of transparent local community engagement. However, we note and object to the removal of the objective set out by the 2017 ANG to “strengthen the UK’s airspace change process and its transparency, particularly with respect to how local communities are involved within it”. Instead of working towards strengthening

transparency and community involvement, the new guidance commits only vaguely to “appropriate” engagement (where it’s deemed relevant). Taken together with the CAA’s recently published plans to reduce the opportunities and timescales for community engagement throughout airspace change processes, and the proposal not to give communities a seat on the UK ADS, this presents a considerable step backward. It appears that communities have been identified as barriers to growth, which justifies limiting the opportunities to voice their opinions as far as possible while giving the appearance of meaningful involvement.

Question 43

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

Whether intended or unintended, AEF’s view is that the implementation of the revised guidance will facilitate increased CO₂ emissions. It will also increase community exposure to noise impacts at the same time that it will reduce the ability for communities to input into crucial airspace design decisions.

The statement: “Emissions from aircraft above 1,000ft are unlikely to have a significant impact on local air quality” is misleading and unsupported by evidence. We believe this is an error: it is generally accepted for the purposes of environmental appraisal that emissions contributing to air pollution from aircraft should be assessed up to 1,000m, or 3,000 feet, as defined by the landing/take-off cycle. That being the case, implementing the revised guidance runs the risk of additionally exposing communities to increased levels of air pollution that have not been quantified. As well as NO_x, aircraft emit ultrafine particles, a subset of PM_{2.5}, and evidence suggests that levels around airports are similar to those found in the busiest London roads. Assessment of air pollution exposure resulting from airspace change proposals should be a key factor in reaching a decision.

In a way similar to its attempts to distance airspace modernisation from increased CO₂ emissions, the revised guidance refuses to take ownership of matters concerning possible increases in air pollution and impacts on habitats, expecting chronically under-resourced local planning authorities to shoulder the burden.

Question 44

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

The consultation states that “The Government believes that aviation can make a key contribution to the achievement of economic growth, increasing the prosperity of the

whole country". This statement is not supported by evidence, and does not address criticisms of the claimed economic benefits of aviation set out, for example in the detailed report 'Losing Altitude: the Economics of Air Transport in Great Britain' (New Economics Foundation, 2023 <https://neweconomics.org/2023/07/losing-altitude>)

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