

**Airport Operators Association response to the proposed criteria for assessing and accepting the
Airspace Change Masterplan – CAP 1887**

Introduction

1. Founded in 1934, the Airport Operators Association (AOA) is the national voice of UK airports. We are a trade association representing the interests of UK airports, and the principal such body engaging with the UK Government and regulatory authorities on airport matters. The AOA's members include over 50 airports and 160 Associate Members, made up of companies representing a wide range of suppliers in the aviation industry.
2. The AOA is also an active member of Sustainable Aviation, the UK coalition of airports, airlines, aerospace manufacturers and air navigation service providers that sets out a collective and long-term strategy to ensure a sustainable future for UK aviation; additionally, the AOA are also partners of the 'Our Future Skies', an industry campaign group making strategic case for airspace modernisation.
3. The AOA is supportive of government and industry efforts to modernise the UK's upper and lower airspace. It is keen to maintain a national conversation on the benefits of modernisation and helps to share best-practice amongst its member airports.
4. The AOA welcomes the opportunity to respond to the Civil Aviation Authority (CAA) consultation on the proposed criteria for accepting an Airspace Change Masterplan.

General remarks

5. The AOA welcomes the clarity provided in the CAP 1887 document, particularly in regard to trade-offs and how the masterplan will be the primary vehicle for considering these trade-offs and conflicts.

Specific points for clarification

6. While the intention to "hold" all airspace change proposals (ACP) at gateway 2 and gateway 3, until the CAA has accepted the relevant iteration of the masterplan, makes sense and helps with the sequencing and coordination of consultations at UK airports, it may have an adverse effect on finances and an individual airport's commitment to the national airspace modernisation programme.
 - a. The CAA should ensure that it has clear internal deadlines in place for its own oversight work related to the ACP gateways and the iterations of the masterplan. This will help to manage the expectations of ACOG and the CAA's external stakeholders. This will be particularly relevant where airports have had initial engagement with their local stakeholders as part of an ACP process; to then have an open-ended delay could be a difficult prospect for those airports to manage and keep the relationship with those communities productive and engaged. The CAA should be conscious of these relationships and the nature of community engagement when drafting these criteria and approving the iterations of the masterplan.

7. The AOA would appreciate clarity as to how the CAA proposes that the Airspace Change Organising Group (ACOG) will assess the “*degree of commitment offered by each individual party*”.
8. The AOA understands the point raised in paragraph 37, regarding the best interests of the overall aviation network and the wider public. Various airspace modernisation programmes and campaigns over the last few years have seen a significant degree of cooperation between airports and air navigation service providers. The national benefit, and indeed imperative, of airspace modernisation is wholly understood in the airport sector.
 - a. The AOA would question why only airports and ANSPs were singled out in paragraph 37. While airports and ANSPs are the likely sponsors of most ACPs, they are not the only stakeholders which have interests and could benefit from those changes. According to the CAA’s own airspace strategy, the interests of all airspace users should be balanced equitably, and the AOA would hope that CAA decisions on the airspace changes that are required are also not solely in the best interests of other elements of the aviation eco-system, including airlines, general aviation, military operations or unmanned aircraft.

The need for strategic direction

9. The AOA particularly welcomes the sentiment first mentioned in paragraph 55, designating that the Secretary of State for Transport will be ultimately responsible for resolving any trade-off decisions that cannot be addressed through existing policy frameworks.
 - a. As airspace is essential national infrastructure, fundamental decisions regarding potential beneficiaries of certain ACPs should be made at the strategic level and reflect the Government’s broader national approach to infrastructure.
10. The AOA agrees with the sentiment expressed in paragraph 84 regarding the current deficiencies in the Government’s airspace policy framework. There is no clear hierarchy of policy considerations or trade-offs to be made. Such a hierarchy or prioritisation can only be directed and decided upon by national government in line with their wider economic and social agendas for the country. However, it is clear from the draft masterplan and the feasibility study that, at least, some trade-offs between crucial policy areas will be required. The Government needs to assign priority to essential outcomes of airspace modernisation such as the reduction in carbon emissions, reduction in local noise effects, potential economic benefit and equitable access to airspace concerns. Ideally these strategic objectives would be consulted upon with industry and wider aviation sector stakeholders.
 - a. The AOA strongly believes that further policy guidance is necessary to ensure Government objectives are achieved and the full potential of benefits are realised through the programme of airspace modernisation.

For further information, please contact AOA Policy and Public Affairs Manager Jeff Bevan [redacted]