

## **British Aviation Group Response to UK Civil Aviation Authority - Airspace modernisation - consultation on a UK Airspace Design Service**

### **About the British Aviation Group**

The British Aviation Group is the leading representative body for British companies involved in aviation and airport development and operations. We represent around 200 member companies from across the supply chain including all aspects of aviation, generating over £2.5bn in revenue in 2019.

Our members range in scale from specialist niche businesses employing 1-2 people to UK PLCs – with over 55% being classed as SMEs. They work and employ staff across all nations and regions of the UK – and export goods and services to over 150 countries.

BAG operates as an autonomous, non-political body under the umbrella of ADS Group – and is funded solely by member subscriptions and income from events. [www.britishaviationgroup.co.uk](http://www.britishaviationgroup.co.uk)

This submission has been prepared by the Chair and members of the BAG board and secretariat, taking account of views expressed by individual member companies where time permitted.

### **Overview of UK Aviation Sector**

The UK is a world leader in aviation – spanning every aspect of the sector – with globally respected airports, airlines and regulator, supported by exceptional aerospace and infrastructure supply chains. Our position in the sector underpins the agenda for Global Britain through international connectivity, direct export opportunities and wider global influence.

In the development of airport infrastructure and systems, the UK has a unique global position – with UK companies involved in the planning, design, delivery and ongoing operations of airports in almost every corner of the world. These range from small regional airports that provide essential connectivity for remote communities to the major transport hubs serving the worlds megacities. UK companies have for example been working with support from the Prosperity Fund to establish sustainable development plans for airport infrastructure enabling social and economic development of the coffee region of Colombia. At the other end of the spectrum, UK designers, contractors and equipment suppliers are central to the development of the 3-runway system for Hong Kong International Airport, developing solutions for a world class airport that protect a sensitive marine environment.

Our global market position is built on, and supports the continued success of, a strong, resilient and sustainable UK aviation industry – with UK airports and airlines providing direct connectivity to our global markets and a showcase for UK products, services and innovation.

### **Response**

The British Aviation Group (BAG), representing the British Aviation Supply Chain, supports the principle of UKADS and believes that NATS is the preferred body qualified to take it on. BAG does not think there are credible alternative solutions for delivery. However, BAG believes there is a danger in creating a presumption that NATS can be pressured into agreeing to a sub-optimal undertaking – or indeed that the CAA can simply change NATS' licence and require it to take this work on. We need to guard against setting the process up to fail. It is understood by many in the aviation industry that the current proposal does not provide a framework for success in several key areas. This runs

the risk of NATS being unwilling to take on the responsibility for UKADS1 based on the current proposal.

The main sticking point is the current CAP1616 airspace change framework which is cumbersome and over-complex. BAG believes that an alternative regulatory model, underpinned by secondary legislation, is required to enable effective delivery. We are aware that the airport sponsors are broadly supportive of this approach.

BAG believes that a simpler regulatory process should be devised if UKADS1 is to succeed.

Options to consider exploring would therefore be:

- If UKADS1 is to deliver the London Area ACPs on time, the CAP1616 process needs to be revised to allow for an amalgamated consultation process for the whole London Area (albeit split into phases if needed), OR
- A new process, shorter and simpler than CAP1616 and reflective of the nationally significant nature of the programme, needs to be implemented to allow the SDE to complete the change on time.

The latter could, in BAG's view, be achieved via a Statutory Instrument (SI) to amend the [Air Navigation Directions 2023](#) (amended last year – for reference: [The Civil Aviation Authority \(Air Navigation\) Directions 2023 \(caa.co.uk\)](#)). A Statutory Instrument would allow for legislative change much quicker than primary legislation, and would amend the Air Navigation Directions accordingly, which the CAA are required to adhere to.

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