

Edinburgh Airport



Airspace modernisation: consultation on a UK Airspace Design Service (UKADS)

Edinburgh Airport Submission

December 2024

Introduction

Edinburgh Airport welcomes the opportunity to respond to this consultation, especially as an airport currently going through the existing CAP1616 process. Given we will not be part of any future UKADS, we have decided not to answer the specific questions; rather we give our views on the broad issues framed in our experience as an active Airspace Change Proposal (ACP) sponsor.

Response to the consultation

Edinburgh Airport understands the need to and supports the desire to progress UKADS, aiming to modernise UK airspace to make it more efficient, flexible, and environmentally friendly. The establishment of UKADS will centralise airspace design, initially focusing on the London TMA region, and should go some way in dealing with overcome current challenges of delivering the UK airspace modernisation masterplan.

We believe the establishment of a centralised UKADS will ensure a unified approach, consistent standards, and robust quality assurance for all ACPs but will not offer any assistance to those areas, such as the Scottish TMA, that are currently battling through CAP1616 and facing many of the issues listed above.

UKADS Structure and Governance

The consultation proposes an option that NERL and UKADS should jointly act as the ACP sponsors and lead the airspace design process which will include resolving design conflicts through trade-offs. We broadly support this approach; however, there needs to be a forum or mechanism built in so airport sponsors can understand, comment on and influence both the process and the design that is developing. It is those airports who will need to communicate designs changes and trade offs with their communities and other stakeholders.

The Advisory Board role and remit is unclear to us. We believe that its focus should be ownership of the process, ensuring resourcing is adequate and scrutiny of UKADS and its performance and delivery.

It should ensure that the process is fair, inclusive, and aligned with best practices, fostering trust among all stakeholders and verifying that the correct procedures have been followed.

It should not be involved in the technical design, whether in terms of trade-offs, programme management or airspace innovation.

It is clear that the Civil Aviation Authority (CAA) is best placed to oversee UKADS to ensure transparency and impartiality in airspace design decisions. However, the CAA can be narrow and inflexible in its approach and we support Airports UK's proposal of additional measures to strengthen the process, particularly in the selection of stakeholders for the UKADS1 Advisory Board.

It suggests that to ensure robust oversight and scrutiny of UKADS1's activities the Advisory Board should include independent members and proposes that AirportsUK be represented on the Board on behalf of airports to ensure fair and balanced input. We agree.

We would also support the proposal of the inclusion of representatives from airlines, consumer groups, and other key stakeholders to ensure a balanced and comprehensive approach. This diverse composition will promote a shared understanding of progress and challenges, allow stakeholders to raise concerns, and provide UKADS1 with opportunities to address them.

However, we must guard that one view does not dominate – it cannot be a vehicle to solely deal with the issue of community noise, for example.

We share AirportsUK's view that these measures will enhance transparency, fairness, and stakeholder engagement, ensuring UKADS1 operates effectively and with trust from all involved parties.

Consultation and Engagement

Airports are proactive in community relations and with engagement with a myriad of other stakeholders and the discussion around airspace must be something that they must have ownership of. It cannot be something done to them. This, we think is important for ensuring collaboration and joint working throughout the ACP process.

We do not believe that NERL should have the responsibility for drafting and providing consultation materials for airspace changes. NERL and UKADS can certainly provide the options and detail, but the consultation should be owned by the airport.

Of course, UKADS would ensure the materials are comprehensive, consistent, and meet regulatory standards. This approach gives the best of both worlds – a standardisation of material, but local control and dialogue with a known and trusted source.

Funding Mechanism

Edinburgh Airport understands the proposals for a UK Airspace Design charge to fund UKADS and a UK Airspace Design Support Fund for ACPs. We understand the "User Pays" concept will be used to level these costs at airspace users.

We're sure this will be welcomed by colleagues at other airports. However, it would be remiss of us not to point out the unfairness of this on those airports, especially Glasgow and Edinburgh, who are in the current CAP1616 process and have not and will not benefit from additional government financed support.

Given the pressure on us to deliver our ACPs at our own expense, we're also concerned that the introduction of such a financing mechanism will unintentionally incentivise some airports to pause ongoing efforts until funding becomes available in 2025 or later. That is simply not an option for Scotland given the pressure on the masterplan and the need to deliver and it is unfortunate that we're being put in this position.

Airspace Changes CAP1616

Edinburgh Airport believes that CAP 1616 was designed to enable one sponsor to conduct an ACP. It is not suitable for the current cluster approach and this gap between the regulation as it stands and what it is being asked to do is confusing and vague for sponsors both in terms of its lack of clarity on how clusters should behave and its fussy and unrealistic application by the CAA.

It simply is not a vehicle for the efficient and timely delivery of airspace change. We understand that this is at the heart of the proposed move to UKADS.

We would welcome clarification and simplification of CAP1616. This is not a plea to reduce the rigour or scrutiny demanded of sponsors by stakeholders. Rather it is an acknowledgement that if the political will is to deliver airspace change, the structures must be there to execute that decision as efficiently as possible.

We would therefore welcome a more practical approach from the CAA with more clarity on what is required and standardised templates for their requirements. We do not believe, for example that it is contrary to CAP1616 for the CAA to engage with sponsors in the periods between gateways to be clear on the standards expected. This is especially important with the cluster model.

We do however understand the significant time it would take to overhaul CAP1616 and the complexities given the processes already in place under CAP1616 across the UK. We also understand the imperative to deliver the airspace masterplan as quickly as possible.

When we consider the CAA's current resource challenges as well as the issues above, we believe change of CAP1616 to be very difficult.

The consultation acknowledges that amendments or supplements to CAP1616 will be made as necessary to accommodate UKADS1's activities that do not align with the existing framework. This cannot be to the detriment of those airports who are already well committed in the process. It should not be done without the consultation and input of those in flight or create any rework or add to their project timelines.

Given those airports are expected to carry out CAP1616 as it stands at their own cost it would be especially unfair if process changes to suit those airports benefitting from UKADS had a negative impact on their ACPs.

Finally, our experience of the Scottish TMA Cluster is that much of the problems with CAP1616 have been in its application by the CAA. Any changes to it must be accompanied by an overall review of how the CAA engages with sponsors, the clarity of its requirements and its wider gateway reviews.

Conclusions

Edinburgh Airport will not benefit from UKADS directly but believes that its experiences in driving an ACP under CAP1616 can offer others value when considering changes to airspace modernisation.

Edinburgh Airport considers that the creation of UKADS will assist greatly in the incredibly complex task of modernising the UK's busiest areas of airspace. It is Edinburgh Airport's belief that the current structures to do that are not fit for purpose.

UKADS more centralised and consistent process will mean more efficient and quicker design and consultation and deal with many of the issues around the current application of CAP1616.

That said, the process needs strong governance with the CAA being augmented by other stakeholders on the governance and we agree with AirportsUK's suggestions on the Advisory Board. It needs to be transparent and fair.

Continuing on fairness, Edinburgh Airport notes the unfairness of it and Glasgow funding ACPs while those that follow will not and remain concerned that these changes will cause other airports to pause their ACPs to take advantage of this.

Edinburgh Airport is clear that CAP1616 and its application by the CAA is not fit for purpose to deliver the masterplan. However, it understands changing CAP1616 is complex. It would urge that any changes to accommodate UKADS should be consulted on with those ACPs currently in flight and no changes that would negatively affect current ACPs be considered.

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