

Response ID ANON-13KB-XES9-T

Submitted to Airspace modernisation - consultation on a UK Airspace Design Service
Submitted on 2024-12-17 15:32:12

About You

A Are you responding in an official capacity on behalf of an organisation?

Yes

Organisation name:
Gatwick Airport Consultative Committee (GATCOM)

B What is your name?

What is your name?:
Monique Smart

C What is your email address?

Email:
secretary@gatcom.org.uk

D Are you answering as:

Local organisation such as a community action group, airport consultative committee or forum

E Where do you live or where is your organisation based?

South East

F Is there anything else that you would like us to know about you in connection with your response?

text box:

G Do you consent to us contacting you by email about progress with this consultation?

Yes

H Do you consent to your response being published?

Yes, with personal identifying information (name, organisation, respondent category, location, additional information - please note your email address will NOT be published if you choose this option)

Background to the Proposals

1 In general terms, do you agree that a single airspace design entity in the form of a UK Airspace Design Service (UKADS) provider, properly scoped, funded and implemented, would address the challenges identified and improve delivery confidence in airspace modernisation?

Yes

In general terms, do you agree that a single airspace design entity in the form of a UK Airspace Design Service (UKADS), properly scoped, funded and implemented, would address the challenges identified and improve delivery confidence in airspace modernisation?:

GATCOM hopes this service will expedite plans of the Airspace Modernisation Strategy and its 2015 predecessor, the London Airspace Management Programme to deliver quicker, quieter and cleaner journeys, to be implemented and help deliver a modern, efficient, safe and sustainable airspace system across the UK.

UKADS must have a robust governance structure and adequate resource to give confidence of outcomes and that allow it and Airports to be held to account.

Scope and priorities

2 What are your views on our proposal that the end-state UKADS scope encompasses all ACPs in UK airspace?

Agree

Please explain your answer including the additional considerations, where relevant.:

A well resourced entity serving the objective of harmonised delivery of the modernisation of all UK airspace should achieve uniform delivery of the associated benefits across the United Kingdom.

Some GATCOM members are concerned about transparency particularly around consultation and they would want assurances that any engagement is a joint Airport/UKADS responsibility and that communities are included as tier 1 consultees.

3 What are your views on our proposal that the short-term UKADS scope should be the London TMA region?

Agree

Please explain your answer including the additional considerations, where relevant.:

London with its multiple airports generates more flights than any other city, creating immensely complex airspace with inherent inefficiencies. GATCOM welcomes the UKADS proposal to unlock progress to a more efficient airspace structure serving all London airports.

GATCOM reiterates that we would like assurances that the UKADS will be adequately governed and resourced to deliver the planned outcomes.

Some GATCOM members are concerned that community and environmental considerations will be treated as secondary issues. In particular they are concerned that at Gatwick the adverse environmental impacts caused by departure flight paths being restrained below Heathrow flight paths needs to be addressed.

4 What are your views on our proposals for the UKADS scope in the medium term?

Agree

Please explain your answer including the additional considerations, where relevant.:

A phased approach to delivering the UKADS

5 Do you have any views on our proposed two-phase approach?

About right

Please give reasons for your answer.:

6 Do you have any views on the models that have been considered?

About right

Please give reasons for your answer.:

Our proposed initial operating model (UKADS1 within NERL)

7 Do you have any views on our proposal that NERL takes on the initial task of providing airspace design services through UKADS1?

Agree, but subject to additional considerations

Please explain your answer, including if relevant any additional considerations. :

The Airspace design services in NERL should be led, managed, governed, financed and resourced as a separate entity to facilitate scrutiny, transparency and accountability for deliverables and outcomes.

8 Do you consider that in progressing a particular cluster of the masterplan, UKADS1 should take over ACOG's current coordination or masterplanning role for that cluster?

Agree

Please explain your answer, including if relevant any additional considerations. :

The ACOG structure and remit has not led to the outcomes expected, however ADS1 will need to be able to focus on its primary task. Any necessary changes to the masterplan will need to be coordinated and integrated.

9 Do you agree that organisations should be able to continue sponsoring ACPs that are in scope of UKADS1 if UKADS1 is not able to prioritise them?

Agree

Please give a reason for your answer, and indicate whether such organisations should be required to consult UKADS1 or have the option of using some UKADS1 services.:

Remit for the initial operating model (UKADS1 within NERL)

10 Do you agree with the proposals for UKADS1's remit?

About right

Please give reasons for your answer, in particular whether anything should be excluded in, or is missing from, the proposed remit.:

11 Do you agree with the approach we propose for consultation and engagement on ACPs, including who pays for these activities?

About right

Please give reasons for your answer, including any views on the other options suggested.:

GATCOM agrees that consultation and engagement must be done in a coordinated way, particularly where there are multiple airports involved such as the London area. However, this must be done in close consultation with the airports and the Airport Consultative Committees. UKADS1 should provide a coordination role.

Transition arrangements for the initial operating model (UKADS1 within NERL)

12 What are your views on our transition proposals?

About right

Please give reasons for your answer.:

13 What are your views on our proposal that, where appropriate, UKADS1 should merge the existing ACPs into a single ACP for the cluster or deployment?

Agree

Please give reasons for your answer.:

14 What are your views on our proposal that the CAA approves each transition plan?

Agree

Please give reasons for your answer.:

GATCOM seeks assurances that CAA will be sufficiently resourced to scrutinize and approve the transition plans in a timely manner.

15 What changes would you propose to amend and/or supplement CAP 1616 in order to accommodate the UKADS?

What changes would you propose to amend and/or supplement CAP 1616 in order to accommodate the UKADS?:

As stated in the consultation document we would expect any changes to CAP 1616 to be consulted on separately and we would provide comment at that stage.

Governance for the initial operating model (UKADS1 within NERL)

16 What are your views on our proposals for UKADS1 governance?

About right

Please give reasons for your answer, including whether the proposed arrangements would be sufficiently proportionate, transparent and robust, and how you see this working in practice.:

The governance must make clear the roles and responsibilities of each party.

The Advisory Board referred to should include representation from community stakeholders. We appreciate this would not be on a very local level but a national group, such as AEF, that could represent community views could be considered.

17 Would these proposals give sufficient reassurance that potential conflicts of interest arising from NERL providing airspace design services through UKADS1 are mitigated?

Yes

Please give reasons for your answer, including any comments or suggestions about the proposed Advisory Board.:

See response to question 7

Funding UKADS and other airspace change

18 What are your views on our proposed new Airspace Design Charge to meet the efficient costs of NERL in providing an airspace design service through UKADS1 and to create a UK Airspace Design Support Fund for other eligible UK airport ACPs?

Agree

Please give reasons for your answer, including, if relevant, what other method you propose, such as our alternative hybrid option.:

See response to question 7

19 Which elements of expenditure on an ACP do you think should be eligible under the UK Airspace Design Support Fund?

Which elements of expenditure on an ACP do you think should be eligible under the UK Airspace Design Support Fund?:

GATCOM feels more clarity is needed to be able to respond to this question. What are the options that CAA foresees?

Our ambition and expectations for the proposed end-state operating model (UKADS2)

20 Do you have any views on our proposed concept for UKADS2?

About right

Please give reasons for your answer.:

General

21 Do you have any other comments about the proposals in this consultation document or about the accompanying Regulatory Impact Assessment? Is there anything we have missed?

Do you have any other comments about the proposals in this consultation document or about the accompanying Regulatory Impact Assessment? Is there anything we have missed?:

The GATCOM Environment Group representative, GACC, do not fully support this GATCOM response. They feel that airspace modernisation is currently a one-sided programme in which little thought has been given to realising community benefits or balancing them with industry benefits. They state that it is likely to have serious health and financial implications for communities under concentrated flight paths and those risks would be compounded by the creation of a powerful, industry-led change sponsor which would be remote from communities and required to prioritise industry objectives.