

**Civil Aviation Authority Consultation on the UK
National Performance Plan for Air Navigation Services**

A response by

MANCHESTER AIRPORT GROUP PLC

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Introduction

- 1.1 This is the submission of the Manchester Airport Group plc (MAG) to the Civil Aviation Authority's Consultation on the UK National Performance Plan for Air Navigation Services.
- 1.2 MAG is the UK's second largest airport operator and comprises the airports of Manchester, East Midlands, Humberside and Bournemouth. MAG handled over 317,000 air traffic movements in 2010.
- 1.3 The group is engaged in a wide range of airport related businesses including air navigation services, property development and management; car parking; airport security; fire fighting; engineering; advertising and motor transport services.
- 1.4 MAG is a certified provider of Air Navigation Services for services at Bournemouth, East Midlands and Humberside Airports. It contracts NATS to provide services at Manchester Airport.
- 1.5 MAG therefore has a direct interest in the development of ANS in the UK and Europe.
- 1.6 Because the National Performance Plan currently affects en route providers we are generally content with the overall approach that the CAA has proposed and consulted on to date and we do not therefore provide detailed comments on the questions asked in the consultation.

General Comments

- 1.7 Airports are already directly and indirectly affected by the performance plan, in particular, through the provision of data, and it is important that due consideration is given to their position as part of the aviation network. We therefore provide brief general comments on the potential impact of the NPP.
- 1.8 As a commercial entity, not in a monopoly position, MAG is strongly of the view that it should not be exposed to regulatory costs at any stage of the development of the NPP. That is particularly so as it applies to en route ANSPs: costs incurred through the NPP should be borne in full by NATS.
- 1.9 If NATS meets its targets under the NPP it will receive a significant financial bonus. Airlines will also benefit from reductions in charges and improvements in flight efficiency.
- 1.10 In contrast MAG does not see any significant benefit for airports. On the contrary, MAG and others will encounter more regulatory oversight and greater demands on our resources.

- 1.11 Compliance with European Commission Regulation 691/2010 for the mandatory provision of operational data has already incurred a significant cost in management time and technical development.
- 1.12 Although such data reporting currently applies to four UK airports, the anticipated cascade will involve a total of 11, many of which will not conveniently have any. Proportionally, these airports therefore face a greater cost.
- 1.13 As the plans for RP2 are developed and the plan descends into Terminal Airspace charging it is likely that demands on data and associated costs will be increased. This could be a significant issue for airports that do not have the expertise or an operations database capable of gathering and sending the data that will be required.
- 1.14 MAG would expect, therefore, that the CAA recognise that commercial interests drive regional airports' behaviour and that they should not be expected to incur any additional direct costs or administrative burdens that do not deliver commercial benefits. The NPP should take due account of this.
- 1.15 We look forward to contributing to the next stage of consultation and the development of the NPP.