

CAP 3121 Economic Regulation of NERL - response to Consultation

From: Bickertons Aerodromes Ltd owner and operator of Denham Aerodrome (EGLD)

Overall we support the formation of a UK Airspace Design Service and the choice of NERL to deliver this. However, we are not able to comment on the details in this CAP as it deals with matters outside of our knowledge base.

The point of writing a response is to lodge with you our grave concerns that, as written in CAP3106, Denham Aerodrome appears now to fall outside the eligibility criteria for funding any potential restart of our ACP (ACP-2020-078). We wish to point out that in the previous stakeholder engagement activities this was not made clear. Furthermore, being located under the LTMA, and the London CTR for the most part of our ATZ, and already voicing concerns to ACOG, London Heathrow and RAF Northolt about threats to continued IFR arrivals, consideration of a restart will not be possible if we have to go up against NERL in order to secure our RNP approach.

We understand that the current eligibility criteria includes words such as 'airport', 'airline', 'significant' and 'en-route charges'. As we serve a significant sector of Business Aviation and our IFR arrival clients pay en-route charges we fail to see how, coupled with London Cluster of extant ACPs around us, we could be excluded.

We will be writing separately to the CAA/DfT about this issue but needed to register our concerns with you within the tight timescale set.