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Aer Lingus response to CAA consultation on CAP3190 - NR28 Draft Method Statement and Business Planning (BP) Guidance

Aer Lingus welcomes the opportunity to respond to the Civil Aviation Authority's ("CAA") consultation on the NR28 Draft Method Statement and Business Planning Guidance.

Aer Lingus fully supports the responses submitted by our sister airline British Airways and by our parent company, International Airlines Group ("IAG") as well as the wider airline community submission. This response is provided in addition to, and not in place of, those submissions and should be read accordingly.

Safety, Capacity and Consumer Outcomes

Aer Lingus supports the CAA's clear recognition that safety remains its primary duty in the regulation of NERL. Safety is the highest priority for Aer Lingus and NERL plays a critical role within the wider aviation system in maintaining and enhancing safety performance.

Looking to NR28, Aer Lingus considers it essential that safety planning continues to evolve in line with emerging risks, including airspace modernisation, increasing traffic levels, new airspace users and the potential recurrence of GPS interference. Continued collaboration across the sector will be fundamental to managing these risks effectively.

In addition to supporting the CAA's stated priorities - safety, user needs, resilience, efficiency and value for money, and airspace modernisation - Aer Lingus considers that the following areas are also prioritised within NR28:

- Ensuring accountability for service delivery,
- Safeguarding service performance,
- Driving flight efficiency and environmental improvements,
- Efficiently executing Capex deployment,
- Demonstrating affordability for users, delivering essential outcomes at the lowest sustainable cost.

Airspace Modernisation and Sustainability

Modernising UK airspace remains critical to improving operational resilience, reducing delay and supporting environmental performance. Aer Lingus strongly supports the timely delivery of airspace modernisation, particularly within the LTMA (London Terminal Manoeuvring Area), as a prerequisite to accommodating future demand while protecting consumer outcomes, and consider that NERL should provide a clear, detailed 10-year strategic roadmap linking UKADS (UK Airspace Design Service) obligations, Common Platform delivery and LTMA modernisation.

Aer Lingus agrees that there is a material risk that airport growth could progress ahead of deliverable airspace capacity, leading to increased delay and reduced resilience. These risks should be clearly

identified, assessed and mitigated within NERL's business planning and the CAA's regulatory framework.

Aer Lingus does not accept that service deterioration is an inevitable consequence of change and capacity growth and current levels of NR23 performance (recent outages aside) should not be allowed to diminish.

Operational improvements that enhance flight efficiency are essential to supporting aviation's decarbonisation objectives and NERL's role in enabling these outcomes through UKADS obligations and technology delivery should be clearly prioritised within NR28.

Regulatory Framework, Costs and Incentives

Aer Lingus supports the use of an independent traffic forecast for the NR28 settlement and agrees that STATFOR remains the most appropriate source. We support continued scrutiny of forecasting assumptions, risk-sharing mechanisms and the overall balance of risk and reward within the regulatory framework.

Cost efficiency and affordability remain central considerations across all building blocks requiring clear and transparent links between costs, outputs and consumer benefits. Cost allowances must be earned with clear evidence of investment demonstrably linked to user-relevant outcomes, with enhanced cost assessment including rigorous bottom-up cost analysis.

Incentive frameworks need to support the timely and efficient delivery of capital programmes, meaningful user engagement and service performance outcomes that reflect end-to-end system impacts to the user and consumer. We agree that service performance metrics should be comprehensively reviewed to ensure the development of the most appropriate performance framework that most adequately reflects user and consumer priorities and pain points.

Business Planning Guidance

Aer Lingus supports the requirement for NERL to prepare a robust base scenario, supplemented by credible scenario analysis extending beyond traffic forecasts to include delivery, scope and financial uncertainties. This will be critical to support effective constructive engagement and regulatory assessment during NR28.

We consider that CAA should be prepared to disallow costs from its determination of NERL's cost allowances if NERL does not present sufficient justification for cost elements.

Aer Lingus welcomes continued engagement with the CAA as the NR28 process progresses.

Yours sincerely,



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