

CAP 3164 Economic Regulation of NERL – response to Consultation

From: London Oxford Airport

Hello,

I would like to add the following submission to the consultation process on behalf on London Oxford Airport:

1. We challenge the 450,000 passenger threshold is an arbitrary metric for smaller airports that facilitate high-value business aviation and critical pilot training. Our recently abandoned ACP was a result of the shifting regulatory landscape and we may require access to ASDF to restart this work without placing an undue financial burden on a smaller operation.
2. Because Priority 1 is focussed entirely on the London TMA until 2035, airports in other regions may feel neglected. Designation for non-LTMA regions creates a two-tier modernisation process. In particular, business jets and training aircraft require efficient lower airspace designs that may be delayed if NERL's resources are disproportionately consumed by the London TMA airports. Or could London Oxford be considered as part of the LTMA cluster of airports?
3. We suggest that NERL should be required to report on how previous design principles or stakeholder data from abandoned projects are integrated into new UKADS proposal to ensure "operational continuity" and respect "past input".
4. We argue that the "user pays" principle should be more granular to ensure smaller airports and their unique users (like training schools) are not subsidizing major commercial hub upgrades.
5. We suggest that membership of the Advisory Board must include specific representation for smaller airports and General Aviation/Training sectors, rather than being dominated by major airlines and hub airports. This ensures that the "guiding mind" is aware of the safety and operational requirements of non-scheduled traffic.

Please let me know if you require any further clarification.

Kind Regards,

John Ellis