



Dear Sir or Madam

**Airspace Change Proposal: Doncaster Sheffield Airport (DSA) (closing date 17/02/2023@12:00 UTC)**

Please find outlined below the response from City of Doncaster Council (CDC) to the CAA notified consultation on an Airspace Change related to Airspace formerly in the custodianship of Doncaster-Sheffield Airport.

I would like to thank you for taking the time to meet myself and colleagues from the Council on 13<sup>th</sup> February to discuss this important issue. We appreciated the opportunity both to understand and highlight some of the issues relating to the ACP; this response reflects our further consideration after that meeting.

Doncaster Sheffield Airport (DSA) is an important local, regional and national infrastructure asset. Alongside the A1/M18/M180, the East Coast Main Line and the Humber ports, it is one of four transport cornerstones that support Doncaster's economic growth, underpin its spatial development, and contribute to the regional levelling-up ambitions that are shared with partners across South Yorkshire, all of whom remain resolutely in support of DSA.

Prior to its recent closure by The Peel Group, the airport supported an estimated 2,700 jobs in the regional economy, contributing an annual net GVA of £108.4 million and creating an annual welfare gain of approximately £49.5 million. Taking account of leakage, displacement and multiplier effects, existing modelling estimates that over the longer term around 35,650 net FTE jobs could be supported across the region through the DSA/Gateway East development and spill over growth, with potential to generate around £1.56bn in GVA annually.

In addition to its vital economic benefits, DSA also served a number of strategically important aviation functions (including blue light and coastguard services) and acted as an international gateway, which was valued by passengers and businesses in South Yorkshire and our neighbouring counties, for whom the next nearest airport offering similar services is 1.5 hours away. Moreover, in the right ownership, and with appropriate vision and resources, it could, once re-opened, accommodate a variety of aerospace activities that the closure process has highlighted to us. With this in mind, CDC and its South Yorkshire

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partners are determined to acquire and re-open the airport. There is extensive support for re-opening DSA from the public and business community, with cross-party political backing. A petition with well over 100,000 signatories has already called for the airport to be saved.

Negotiations with the airport owner are ongoing and as the lead local authority, City of Doncaster Council has already commenced the process to acquire DSA, using a Compulsory Purchase Order if necessary. We are confident that there is significant investor interest in DSA. However, potential changes to the current airspace by the Civil Aviation Authority risk undermining this process, the delivery of our major economic plans and the terrestrial planning process. This is critical given the current cost of living crisis and the challenging national economic outlook.

We are therefore seeking a temporary extension of the current airspace arrangements, while plans to re-open DSA are progressed, rather than the proposed airspace change. We believe there are several compelling reasons to do so:

**1. There is no urgent safety need to reallocate the airspace**

The airspace is currently safe and secure using the NOTAM process, and the reallocation of airspace could still be delivered at a later date if the airport were not to re-open. There would be no prejudice to normal procedures if the airspace was not reallocated – this is an exceptional case. Any perceived benefit to other uses can still be achieved in the short-term through the NOTAM process effectively redesignating the airspace as Class-G

**2. Only limited benefits would be achieved by reallocating the airspace now**

There is no time-bound major aviation or economic opportunity that would be lost by deferring reallocation. It has yet to be determined who would benefit from any airspace change, whether this would be offset by the infrastructure DSA provides for the General Aviation (GA) community and that a reopened DSA can be expected actively to welcome GA flying, which will play an important role in the future of the airport.

**3. Removing the airspace prematurely will undermine plans to re-open DSA and will have demonstrable negative economic consequences.**

Any loss of controlled airspace will act as a disincentive to new private sector investment by adding significant time, costs and uncertainty to the process of re-establishing the airport, thereby increasing risk levels. The possibility that DSA may not be granted airspace as comprehensive as it had at closure would make the airport less attractive to airline operators and large Airspace Change Projects (ACPs) under

the current CAA CAP1616 process (which this would certainly be) are typically taking 4-5 years. This will have a material impact on the future of the airport.

If the extant DSA Airspace is dis-established permanently and a new owner/operator has to start again from scratch, the need to re-establish Airspace is likely to substantially delay the re-opening of the airport (at least for commercial flights) affecting job creation, GVA growth and our levelling-up plans. It will almost certainly be the critical path item.

**4. Reallocating airspace now may prove to be a redundant exercise but will mean significant time and financial penalties are incurred in the coming months and years.**

By altering the airspace prematurely, the CAA would generate significant financial and time and resource penalties for both it and external parties. The CAA may ultimately need to reinstate the same or very similar airspace to the current structure, effectively re-creating what has been undone. Re-establishing airspace, and the procedures within, is likely to result in an unnecessary cost in excess of £1m.

The large number of ACPs associated with the Future Airspace Strategy (FAS) is already occupying CAA resources meaning that there is a very real chance of delay to reestablishment of controlled airspace. Furthermore, the DSA procedures were up to date having introduced satellite based (GNSS) procedures in 2016, ahead of most other UK airports – to see all that work discarded would be an unnecessary retrograde step (noting that some work to establish GNSS procedures was funded by European grant money – i.e. by taxpayer funds from the public purse).

**5. Ongoing activity to remove and subsequently reallocate airspace will result in unnecessary disruption and uncertainty for local communities.**

Raising issues of airspace allocation that have been settled in the area for some time is unnecessary and will create uncertainty and anxiety for communities around the airport. After 17 years of operation, people are used to where the aircraft fly. A new ACP project has the potential to result in new airspace design proposals that are different to the current airspace, creating public opposition that does not currently exist. There is strong public support for re-opening the airport taking into account its previous operation. Furthermore, Doncaster Council may find it necessary to oppose any Airspace Change delivered through the current process, and/or commence a new Airspace Change proposal, resulting in further pressure on public resources.

Preserving the current airspace designations on a temporary basis will support our plans to secure new inward investment and deliver vital economic growth and job creation at the

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earliest opportunity. To do otherwise risks deterring inward investment, unnecessarily incurring financial costs and potentially resulting in extremely detrimental procedural delays in re-opening the airport to commercial traffic when there is no overt reason to do so.

We therefore request that the controlled airspace designations associated with DSA while it was operational be temporarily suspended for a period of 12 months, rather than subjected to a permanent change procedure when the future of the airfield is not settled.

Yours sincerely

[Redacted signature]

[Redacted name]

City of Doncaster Council