GAA General Aviation Alliance response to HM Government
on
Beyond the horizon. The Future off UK Aviation
A call for Evidence on a new Strategy

1.0 About GAA

The General Aviation Alliance (GA Alliance) is a group of organisations representing the interests of many in the UK General Aviation (GA) industry. It was formed in 2004 to address the need for co-ordinated response to UK regulatory issues. Members of The Alliance include; British Balloon and Airship Club (BBAC); British Gliding Association (BGA); British Hang Gliding and Paragliding Association (BHPA); British Microlight Aircraft Association (BMAA); British Parachute Association (BPA); Helicopter Club of Great Britain (HCGB); Light Aircraft Association (LAA); PPL/IR Europe – European Association of Instrument Rated Private Pilots; Royal Aero Club of the United Kingdom (RAeC). The Alliance coordinates circa 72,000 subscription paying members of these bodies.

2.0 Background comment

The Department of Transport General Aviation Strategy 2015 is as far as we are aware the first time UK or any other nation recognised the importance of General Aviation (GA) within the Aviation sector. Valuably it fed a similar focus in Europe. We now welcome the initiative to develop a broader comprehensive UK aviation strategy well beyond the limited scope of the 2013 Aviation Policy Framework and the more recent 2015 Airports Commission Final report, focusing on South East capacity. The thrust of the new approach with a focus on market and consumers' risks, is championing the economic benefits of aviation, building on the capacity decision. Whilst laudable and indeed recognising GA it has difficulty fitting it in in the strategy. The consultation document states: - *"The government is interested in gaining a better understanding of the benefits and requirements of the sector, and whether it is possible to identify a strategic network or level of infrastructure to enable the sector to continue its valuable role."* A perspective on that is that Air Transport is valued at economic value of £14 bn pa and 220K jobs. The GA is a sector worth £3bn pa and 38K jobs and is an integral part of the aviation sector and its sustainability.

GA has an important commercial/business aspect, however a significant part of the sector at flying level has limited *"customer aspect"* and is recreational in nature itself a national benefit, yet it is a vital part of the of the broader aviation spectrum that enables, supports and feeds the commercial sector. For example, there are multiple examples of GA supporting training of pilots and engineers to ensuring the survival, development and growth of the commercial sector as well as through recreational activities ensuring a "UK aviation minded and capable broader sector". Similarly, technical innovation and developments have emanated from GA developments: use of composites and high efficiency airframes have developed from competitive gliding, and amateur built aircraft; instrumentation including navigational aids has developed in the sports and recreational sector which have fed into the commercial sector. Multi rotor drones developed from Aeromodelling – now ironically at risk due to drone regulation. In addition, of course there is a network of support activity in pilot training, engineering, manufacture and support: itself having an interface with commercial air traffic interests.

Our strong contention is that a national aviation strategy must see aviation as a spectrum ranging from the variety of GA & Sports and recreational activity (see GA Strategy 2015) to the directly and perhaps more clearly seen national benefits of airline passengers and freight activity. It is the sustainability of the whole that matters in supporting the UK's leading role in aviation and ensuring the championing of those economic and social benefits. GA is the foundation of the air transport and aerospace sectors and needs to be included in government strategy in that context.

The thrust of the current GA strategy is to make the *UK the best place in the world for GA*. And develop the sector in its own right. There are multiple issues and key matters to address with a very different profile to Commercial Air Transport (CAT) which would together demand more than a chapter in the proposed new strategy. So, whilst the previous GA strategy will continue to exist a concern is how or whether the GA element is incorporated in the new document. (A charter and or updatable key priorities list has been suggested)

Given the current phase of the consultation, and associated and planned "round table events" our response briefly highlights specific issues relevant to the Aviation strategy we seek to take into the ongoing consultation process.

3.00 Matters and issues for strategic consideration:

3.01 Appropriate regulation. Following the GA Strategy 2015 and similar approach in EU progress has and continues to be made on ensuring proportionate risk based regulation and appropriate de-regulation for the sector (as opposed to an onerous commercial aviation based approach) based on fully understanding the sector. Whatever Brexit brings it is essential that the trajectory continues. Specific areas are Airworthiness (including continuing airworthiness, Operations and Licencing (pilots and airworthiness engineers). Airspace covered below. The Red Tape Challenge activity has helped progress but there is still work to do and multiple examples of regulation in place and in development that has adverse consequences for GA: the extent to which GA has to continually fight its corner across its sector interests to ensure is survival is unacceptable (Eg EASA regulation potentially decimating aero modelling, and current work to ensure basic proportionality for EASA regulation of Gliding and Balloons.).

3.02 GA network of Airfields. A major area at risk and fundamental element of all aviation activity with each sector of aviation needing an appropriate network to operate at all, ensuring the vital connectivity and access essential to aviation. Loss of airfields is a key issue for all GA operators from sports and recreational activity to Business GA such as air taxi operations. Work is currently in progress with DfT to evaluate the GA network and balance with other market factors. The current undesirable trajectory needs urgent reversal.

3.03 Airspace. With airfields an equally essential infrastructure aspect meriting a significant place in an ongoing strategy. GA is suffering from a legacy piecemeal airspace position in some measure at variance with international best practice which is increasingly mitigating against the free movement essential to the sectors survival. Add to that increasing volumes of controlled airspace notably but not exclusively at regional airports aggravating competing interests and it is clear that this <u>is the major issue</u> for many in the GA sector. To some it is now at damaging levels and indeed compromising operational safety in the sky: recent attention to infringements is a symptom of a very much wider issue. Airspace is a national asset for the benefit of all and needs to be seen as such. The stewardship, governance and regulation of airspace needs urgent review, amplified by the need and difficulty in order to modernise the actual airspace structure to anything like best practice. A new aviation strategy will need to have a clear way forward on this issue with clarity on Government and regulatory roles.

3.04 Taxation policy. UK flying training is often cited internationally as the best available. Unfortunately and probably uniquely among academic and vocational training worldwide, UK flying training is subject to VAT. Repeated efforts to challenge HMRC on that have failed to make any impact with HMRC. The same applies to tax on aviation fuel. Many feel UK flying training is being allowed to die despite it being a clear foundation for commercial pilot training as well as potentially other industry skills. This issue needs resolution to ensure a level, or indeed advantageous international playing field.

3.05 Training Pilots and Engineers (& STEM Activity). GA, in all its forms from model flying to personal and business aviation, is generally recognised as the foundation of aviation and aerospace industry recruitment. We are told that the industry needs 500K pilots and 600K engineers worldwide as well as other related aviation jobs in the next 30 years. In many ways, the foundation skills and associated mindset are that link between GA and CAT as well as the lifeblood of GA. The value added is significant, ensuring the development of aviation minded people to fill the spectrum of roles from designer to maintenance engineer to pilot or airline manager (itself a vital role). Aviation for many is a passion rolling through early experience often initiated from the GA sector.

An element of this is the success of UK on the world competitive stage, poorly recognised outside the sector. Nearly all aspects sports and recreational associations have members who have consistently achieved the highest level of sporting awards at international, Fédération Aéronautique Internationale (FAI) and other events. This is particularly true of: - Aero modelling, Ballooning, Parachuting, Hang & Para Gliding, Microlighting, Gliding and Helicopter flying. Credit is due to those who do this both individually and in their contribution to an "aviation minded" and successful UK. The aviation strategy should recognise the value of this at social & educational level and ultimately to UK plc.

3.06 Military Dimension. There is only one reference to "military" in the consultation document; i.e. related to operating their own safety regimes. However, it is a part of the aviation spectrum: GA is a feed to those entering the military just as ex-military personnel frequently play a part in the wider aviation picture in many roles post service. We share the same sky and many of the issues GA have on airspace affect military operators.

GAA RH 11102017v3