

Response ID ANON-X2G3-WNPG-Z

Submitted to **Draft Airspace Modernisation Strategy**

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About you

A What is your name?

Name:

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B What is your email address?

Email:

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C Where do you live or where is your organisation based?

East Midlands

D Are you answering as:

Representative or national organisation or institute

E Are you affiliated with any organisation?

Yes

Affiliation:

General Aviation Alliance

Yes

F Is there anything else that you would like us to know about you in connection with your response?

Further details about you:

G Do you consent to your response being published?

Yes, with personal identifying information (name, location, respondent category, organisation, additional information - please note your email address will NOT be published if you choose this option)

General observations

1 Do you agree with the overall approach taken in the strategy, as described here?

Mostly

Overall approach - comments:

We understand and support the need to modernise UK airspace but consider the current strategic objectives to be too focussed on the commercial aspects of UK aviation. We believe that equal weight should be given to the needs of the GA community and that a detailed review of the lower airspace should be conducted with the aim of increasing GA access. The strategy needs to deliver a modernised UK airspace that works for all forms of aviation operating safely in harmony.

Policy 'ends'

2 Has the CAA identified the right Government policies in this strategy?

Mostly, but there are existing Government policies missing

Right government policies - additional comments:

The Government policies that have been identified are relevant to airspace modernisation but focus largely on the commercial and environmental aspects of UK aviation. There should be reference to, and due consideration of, the Government's General Aviation Strategy that was published in March 2015.

The policy to establish an Independent Commission for Civil Aviation Noise (ICCAN) is relevant and welcomed but could go further. There are other aspects of airspace modernisation, safety being the obvious one, which would benefit from independent oversight.

'Ways' of modernising airspace

3 Do you agree with the 14 initiatives set out in the strategy?

Mostly, but some other initiatives are missing

Agree with 14 initiatives - additional comments:

We have no difficulty with the 14 initiatives, the implementation of which will need to be coordinated, but with myriad new demands for uncontrolled airspace for the use of, for example, drones, there is a real need to ensure that the initiatives are not all driven by commercial requirements. With that in mind, and given the Government objective to make the UK the best place in the world for GA, we believe there should be an initiative to review the lower airspace with the aim of increasing access for all classes of aircraft across the GA sector. We would also like to see an initiative to consider how airport operators might be incentivised to release regulated airspace. If, however, this proves fruitless, and the CAA is not empowered to direct airports to release redundant or underused airspace, we believe that consideration should be given to more radical methods of airspace allocation such as licensing, including formal audited periodic re-licencing against specific criteria.

Gaps identified in the strategy

4 Have we identified the right gaps? Are there any that we have not identified?

Gaps in the strategy?:

Other than the comment about ensuring that the implementation of the various initiatives is coordinated, we have no further comment.

Approach to the 'means' of modernising airspace

5 Do you agree with our approach of asking those organisations tasked with delivering the initiatives to set out deployment plans to identify the means (resources) necessary?

Yes

Deployment plans - additional comments:

Yes, although we cannot comment on their ability to deliver.

Governance

6 The draft governance structure in this document was developed by the Department for Transport, CAA and NATS working together. Do you agree with the approach set out here?

No

Governance - additional information:

The governance structure does not lend itself to independent decision making. We are particularly concerned about the role of NATS, 42% of which is owned by the Airline Group and which is funded by the airline operators, as the airspace modernisation Project Management Office (PMO). We would like to see the appointment of a truly independent PMO to provide oversight of the airspace modernisation delivery plan.

The role of the CAA as the airspace regulator and primary decision maker is set out clearly in the strategy, albeit muddled somewhat in practice by the fact that, although accountable to Government, it is funded by those it regulates. Notwithstanding, without the power to mandate airspace modifications within the delivery plan, it is difficult to see how the plan can be achieved. As such, we support the move to give the Secretary of State new legislative powers to direct airports, through the CAA, to take forward the airspace changes necessary for modernisation.