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CAA Airspace Modernisation Strategy Consultation Team
By email

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GA ALLIANCE RESPONSE TO THE CAA AIRSPACE MODERNISATION STRATEGY

This is the General Aviation Alliance (GAA) response to the new draft Airspace Modernisation Strategy (CAP 1690) consultation and should be read in addition to the GAA on-line survey comments, as well as any responses from individual GAA member organisations.

The GAA is a group of organisations representing the interests of many in the UK General Aviation (GA) industry. Members of the GAA 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 GAA coordinates about 72,000 subscription paying members of these bodies.

Introduction

The GAA understands and supports the need to modernise UK airspace to create structures and flight procedures that are efficient, safe and proportionate for all users. In doing so, we recognise the considerable challenge in balancing the differing requirements of a broad range of users, particularly at lower altitudes, and stand ready to contribute to subsequent work to deliver the strategy, either directly or through the Future Airspace Strategy VFR Implementation Group (FASVIG).

Whilst the GAA welcomes the strategy, we are concerned that it is focussed largely on the commercial aspects of UK aviation and pays insufficient regard to the needs of, or issues facing, a burgeoning GA community. These need to be given more consideration in the strategy if the Government's objective to make the UK the best place in the world for GA is to be achieved. As a national asset, airspace should be available to all (with the default position being uncontrolled airspace), which requires a holistic approach to satisfy the requirements, as far as possible, of all forms of aviation. Our main concerns centre on the proposed governance arrangements and on the modernisation of lower airspace.

Governance arrangements

The governance structure does not lend itself to independent decision making, with only the proposed Independent Commission for Civil Aviation Noise (ICCAN) providing independent oversight, albeit with a very narrow remit.

We are particularly concerned about the integrity of a structure that essentially places 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 believe there is a need for independent oversight of airspace modernisation and would like to see the appointment of a truly independent PMO to provide oversight of the delivery plan. Additionally, we believe that consideration should be given to creating further independent bodies like ICCAN to provide oversight of other important aspects of the modernisation programme, such as safety.

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 initiate or mandate airspace modifications within the delivery plan, it is difficult to see how the current piecemeal development of lower airspace based on change proposals submitted by commercially driven airports and Air Navigation Service Providers (ANSPs) will 'further enable greater access to airspace for non-commercial users.' 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.

As highlighted last year by Andy Wightman MSP ("Flawed Airport Consultation" speech to the Scottish Parliament on 27 April 2017), the governance framework is simply not one that can work in the public interest when both the CAA and NATS are accountable to the Government but funded by the airline industry and therefore accountable to private interests as well.

Lower airspace modernisation

The key part of the strategy for the GA community, unsurprisingly, concerns the modernisation of airspace at lower altitudes where the majority of GA activity takes place. The GAA is, therefore, particularly interested in ensuring that GA needs and views are fully considered in the modernisation of airspace below around 7000 feet, both around airports and outside controlled airspace. We have no difficulty with the initiatives relating to these areas but, given that the strategy '...is expected to improve access to airspace for General Aviation, by enabling greater integration (rather than segregation) of different airspace user groups', are concerned that there is not more emphasis on changes to the overly complex and outdated lower airspace structure.

Whilst the strategy refers to new airspace, procedures and technology to improve booking and release of segregated areas in the upper airspace under the Advanced Flexible Use Airspace (FUA) initiative, there is no corresponding lower airspace initiative. Indeed, there is no reference to the reclassification of under-utilised or redundant controlled airspace and scant mention of the shared use of regulated airspace for VFR operations. We strongly believe that there should be an initiative to conduct a review of the airspace below 7000

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feet to identify, inter alia, underused or larger than strictly necessary controlled airspace, with the aim of releasing this and improving access for all classes of aircraft across the GA sector. Such a review could also usefully consider 'best practice' elsewhere in Europe.

On a related point, although the strategy acknowledges that many airport arrival and departure procedures today are outdated and should be redesigned based on more precise satellite navigation technology (and the steeper climbs and descents that modern commercial and military aircraft are capable of), there is no mention of the opportunity here to reduce the dimensions of controlled airspace around airports. This is a significant issue for GA and would go some way to reducing hot spots of congestion in lower unregulated airspace and thus the risk of mid-air collisions. The GAA believes that modern commercial aircraft performance and technologies should translate into reductions in the dimensions of airport control zones. The strategy ought to highlight this and initiate work to consider how commercially driven parties can be incentivised to release controlled airspace.

Conclusion and recommendations

In conclusion, the GAA understands and supports the need to modernise UK airspace but is concerned that GA use of airspace (both controlled and uncontrolled) has not been given due consideration in the strategy.

Specifically, we have concerns about the proposed governance arrangements and the approach to delivering change at lower altitudes. To address these issues, we recommend that:

- A truly independent PMO is appointed to provide oversight of the modernisation delivery plan.
- Consideration is given to creating further independent bodies to provide oversight of specific aspects of the modernisation, such as safety.
- The CAA's powers are extended to enable it to direct airports to take forward airspace changes necessary for modernisation.
- An additional initiative is introduced to review the airspace below 7000 feet, with the aim of identifying and releasing underused or larger than strictly necessary controlled airspace and increasing GA access.
- Work is initiated to consider to how airport operators might be incentivised to release regulated airspace.

Yours sincerely



Pete Stratten
Secretary
GA Alliance