

British Microlight Aircraft Association Policy for Design Principles during ACP engagement

Introduction

The following text describes the underlying principles that the British Microlight Aircraft Association (BMAA) believes must be followed by applicants for airspace change proposals.

Consultation

- 1. The BMAA welcomes the opportunity to engage in consultation at an early stage within the ACP CAP 1616 process.
- Sponsors are encouraged to engage with the BMAA and its members as early as possible during the development of the ACP. Previous ACPs have missed the opportunity for early engagement and dialogue resulting in significant and costly delays.

Airspace classification

- 1. The BMAA considers that the UK airspace's default classification is G and that sponsors must establish a safety case for proposing to change this class or add any further restrictions or requirements by their ACP.
- 2. All sponsors must demonstrate that alternatives have been considered such as RMZ and TMZ before considering controlled airspace.
- 3. Where Class E is proposed, without a TMZ or RMZ should be considered as the default option.

Access by GA

- 1. Sponsors must accept the assumption that GA including sporting and recreational aviation is entitled to continued safe use of airspace and that commercial aviation does not have a right to limit airspace access.
- 2. Sponsors should ensure that there will be measures to allow flexible use of airspace and prepare for the wider use of electronic conspicuity devices and interoperability with existing e-conspicuity, e.g. FLARM and Pilot Aware etc...

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Airspace volume

- 1. In line with the principles of the Airspace Modernisation (was FAS) principles the ACP must respect the requirement for minimum airspace volumes designed for efficiency and reduced environmental impact. These principles will include:
- Minimum size of controlled airspace
- Minimum number of departure/arrival routes
- Steeper and continuous climbs and descents for cost and environmental benefits as well as minimisation of CAS footprint.

Justification

- 1. Sponsors must conduct and present proper analysis of overall airspace safety changes i.e. based on modelling and evidence rather than purely subjective opinion.
- 2. Sponsors must provide proper validation of forecast traffic levels. There is an expectation that data used, particularly forecasts, will be verifiable including details of any and all assumptions.

Airspace integration

- Sponsors must show how they are integrating their proposal within the overall UK
 airspace modernisation context, for example proposals which do not connect efficiently
 between upper and lower airspace (potentially under different airspace "management")
 would only inhibit overall airspace efficiency and therefore not receive our support)
- 2. Optimisation of the development work above and below the 7,000ft NATS en-route split.

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