

Introduction

The British Microlight Aircraft Association (BMAA) represents the microlight flying interests of its membership, currently numbering above 3700. The members fly 1800 regulated microlights and another, estimated, 300 deregulated microlights.

All microlights are flown for the purpose of recreation with the exception of those used for flight training and testing. Flight training and testing is carried out by persons approved for the purpose by the UK Civil Aviation Authority (CAA).

Microlight pilots hold a licence issued by the CAA to fly their aircraft and are subject to both flight currency and medical requirements to maintain licence privileges.

Microlight aircraft come in many shapes and sizes. Some are very simple with low performance and limited flight instrumentation and equipment. Others are more complex with flight performance that rival many of the traditional "light aircraft" designs and are equipped with modern radio aids and navigation equipment. All microlights are restricted to flying by day in VMC to comply with the VFR.

Summary

The BMAA welcomes the initiative of a total review of the structure of UK airspace. We understand the need to bring the current airspace structures into the modern world reflecting technical advances which will improve efficiency, enhance capacity and have beneficial environmental impact. We do however have concerns with the draft which we will express in this response.

Consumers

The strategy outlined in the document is largely driven to achieve improvements in airspace capacity and passenger experience in commercial air transport (CAT). This is understood, however we are concerned that the strategy apparently considers general aviation interests as significantly secondary to CAT interests. This is demonstrated in Section 5, Further policy considerations.

5.22 There are additional policy areas which may or may not be clarified though the new Aviation Strategy. These include:

5.23 Access for General Aviation: What policies should guide the future design and how that growth and General Aviation access are traded off against one another?

Government and CAA have stated that their intention is to make the UK the best place in the world for General Aviation. For that to happen we believe that it is vital that General Aviation's use of both controlled and uncontrolled airspace is equally considered and included within the modernisation strategy.

Legacy airspace

We completely understand the need for airspace modernisation for the benefit of CAT and support the initiative to completely overhaul the current airspace design to achieve the aims.

We are very concerned that although the draft strategy indicates that NATS will undertake significant redesign work of upper airspace and terminal areas there is no mention of a general review of the lower airspace, below 7,000 feet, specifically to see where underused or redundant controlled airspace might be returned to uncontrolled status. As the draft document points out most of General Aviation activity takes place outside controlled airspace below 7,000 feet. Ad hoc airspace development has created complex lower airspace boundaries compressing General Aviation traffic and increasing the risk of mid-air collision as well as inviting infringements. Legacy airspace is not designed for the modern aircraft performance or flight profiles that the modernisation strategy seeks to develop. As part of the overall airspace review we call for a review of all existing airspace with the intention to apply current operational practices in an attempt to simplify airspace structure and release underused airspace and any airspace rendered redundant following the review.

Airspace management responsibility

We are concerned that the current, and seemingly envisaged, planning of UK airspace is being left to industry with no overall National body responsible for oversight.

The modernisation strategy, like the FAS before it, relies upon industry, ANSPs and aerodromes, to propose airspace changes which in most cases are reviewed in isolation. The existing airspace structure is the result of this approach and suggests that without coordination, with the authority to mandate, an overall restructuring in line with the strategy will not come to fruition.

We understand that the CAA, as the regulator, will not propose an airspace change. To make the modernisation strategy work airspace change proposals cannot be left to industry alone. For example, if there is a situation where one or more changes are reliant on another, without which modernisation will not happen, it cannot be left to existing airspace managers to choose whether or not to cooperate.

Government must create a National body with overall responsibility for airspace planning and management with the power to enforce change where necessary. This would be similar to land planning authorities having a District Plan and the ability to compulsory purchase in order to meet the Plan's objectives. It is generally considered that the Nation having no power to control the use of the finite resource of airspace is not acceptable and this modernisation strategy must address this deficiency.

BMAA response CAP1690 specific questions

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

Mostly. We agree that there needs to be a complete overhaul of the UK airspace structure to meet the requirements for capacity, efficiency and environmental impact. However, we are concerned that if implementation is left to industry modernisation will not include a critical review of existing airspace with the intention of releasing what is underused or redundant.

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

Mostly, but the Government policy that sets out to make the UK the best place in the world for General Aviation is not, in our opinion, sufficiently considered and represented.

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

Mostly, but as in answer to Question 2 there is no specific initiative to benefit General Aviation in line with the Government's stated objective the UK the best place in the world for General Aviation. We also feel that there must be an initiative to review existing lower airspace with a view to releasing underused or redundant portions.

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

No comment

Question 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?

No comment

Question 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?

In our additional response we have expressed concern that if left to industry airspace changes will only be proposed where directly advantageous to the sponsor with no incentive to release underused and redundant airspace. The governance structure must have the power to enforce changes for the wider good without waiting for a sponsor.

Geoff Weighell

CE BMAA