

**APPG-GA Airspace Inquiry October 2018 - Call for Evidence
Response from the General Aviation Awareness Council (GAAC)**

Overarching policy objectives for airspace

The GAAC note, and strongly agree with, the statement in the Call for Evidence, that the UK's airspace belongs to everyone, that equitable access is paramount, and that removing a part of it from certain users must come with responsibilities. This must also, obviously, be accomplished alongside the need to maintain high levels of air safety. These two aspects should form the twin pillars of an overarching airspace policy. In addition, it is of relevance that a stated government aim is to make the UK the best country in the world for general aviation, and this should also be an aim of the airspace policy.

The government has already recognised the legitimacy of these objectives. Under the Transport Act 2000, Section 70 Para 2 (b) the CAA has a duty to 'satisfy the requirements of operators and owners of all classes of aircraft'. However there are many who would argue that with the current system of governance and management this is neither happening, nor possible.

It is worth noting that currently much of GA flies outside controlled airspace, but with the recent and proposed increases in certain controlled areas, this is becoming increasingly difficult in some parts of the country. This makes a full input into decision making by these airspace users crucial if the governments own objectives are to be fulfilled.

Governance and management of the UK's airspace

The governance and management of the UK's airspace should be in the hands of a body free from actual, and perceived, bias towards any particular aviation sector or grouping. One potential way of achieving this is to create a new body specifically to undertake this function, broadly analogous to the creation of the Food Standards Agency (FSA), which initially came into being for very similar reasons; the FSA is responsible for food safety and food hygiene across the UK. It is a non-ministerial government department governed by a board which ensures that it fulfils its legal obligations so that all decisions and actions consider relevant advice and the interests of consumers; it exists to represent the public interest.

It would also be of use to examine and review airspace governance and management in other countries, for example the USA, to identify other possible methods.

There are many different types of 'consumers' who need to utilise airspace in the UK, including commercial airlines, military flying, and 'general aviation (GA)' which itself covers many different types of flying. In addition, there are other types of aerial activities ranging from unmanned vehicles ('drones', model aircraft), through hang-gliding, gliding, ballooning, helicopters etc, all of which have a legitimate claim on access to airspace. Most of the activities have been around for a long time, and have their own broadly understood needs and characteristics, although 'drones' are relatively new and a rapidly expanding category with as yet considerable uncertainty about exactly how this airspace 'consumer' will develop long term.

Equitable access can only be accomplished if the needs of all these types of users are understood and taken into account in airspace design and classification. Thus, any body which has responsibility for airspace governance and management must include those who understand the needs of each type of activity, or have easy and reliable access to such knowledge.

Other factors which need to be taken into account by any body with responsibility for airspace are technological developments which influence navigation, visibility, or other aspects of airspace use, and the changing patterns and trends in airspace requirements. Again, access to and use of such information must be easy, routine, and ongoing.

Roles of parliament, ministers, and government

Taking again the model whereby the governance and management was undertaken by a non-ministerial government body, the initial role would be enabling, with the initial setting up of the body most probably requiring a relevant government initiated and sponsored act of Parliament, again analogous to the FSA. In the case of the FSA, the chair and deputy chair are appointed by ministers, it is supported by seven different agencies and public bodies, its other board members are drawn from across the spectrum of interested parties, and all members must declare all personal or business interests that may be perceived to influence their judgement on the business of the agency. It also has its own website outside the government site. Broadly, this appears to cover the type of organisation identified as necessary to provide governance and management with the minimum bias achievable.

Roles of the CAA and NATS

These organisations would both be available to provide relevant information from their own areas of expertise, to the body tasked with airspace management. However, no agency which is significantly funded by one particular sector of the aviation industry should have a major role in governance and management of airspace, both for reasons of bias and of perceived bias.

Measures to ensure efficiency, equitable access, and to monitor and and withdraw under-utilised airspace, and to ensure governance remains fit for purpose

Suitable terms of reference to ensure incorporation of these activities, plus relevant board appointments would be the main mechanisms for ensuring the above. The detail of these terms of reference would be part of the Act of Parliament which brought such a body into being. Under current systems of airspace management, the CAA has no power to deregulate Airspace without the consent of the original applicant.

Payment for governance and management

Any useful change in the way airspace decisions are made which makes the process equitable, representative, inclusive and open will need to be paid for. The possibilities include direct government finance (as is the case in the USA), support from across the airspace consumer spectrum or a mixture of these. Any agency, if significantly financed by a single user sector, would not be equitable, and at the very least, would be perceived as biased.

The government has stated its aim of making the UK the best country in the world for general aviation, presumably because it recognises both the direct and indirect benefits of a thriving GA industry to the UK. The former has been estimated at £3 billion pa, but more recent estimates suggest it might well be more, as many local business activities derive some of their income from nearby airfields. In addition, there is significant inward investment made by Businesses wishing to invest and develop activity in the UK, bringing billions of pounds of indirect benefit from GA Business Aircraft users. Other significant indirect benefits are very difficult to cost, but cover such things as inspiring the young to look to a career involving STEM subjects generally, and more specifically in the aviation industry, as a pilot, engineer, air traffic controller, manager, or other related work, all of which significantly underpins and supports the UK in commercial and military aviation, and the aerospace industry generally.

Thus it is not unreasonable to expect that there would be proactive financial support from both the government and the wider commercial aviation sector in financing of airspace governance and management. However, it is also not unreasonable to expect that other airspace users also contribute something directly or indirectly towards this management. Of course, in common with other fuel users, fuel for powered flight already attracts Fuel Tax and Duty, which might be considered as a contribution. However drivers also pay road tax (which was once intended for roads!), many boat keepers have to pay licenses for use of rivers and canals, which goes towards upkeep and maintenance, lock keepers etc, and a similar system for airspace users might be considered reasonable and practical if the fuel taxes were not considered contribution enough.

Footnote on the links between airspace and airfields

During the preparation of this response on airspace, a number of points were raised on the obvious and necessary links between airspace and airfields. Although not the primary focus of the airspace enquiry they are mentioned separately, here, for completeness.

It has been stressed that, unless a suitable strategy to maintain and enhance a network of airfields for use by the different sectors of GA flying is established, the value of any work on airspace planning is greatly lessened. One comment worth quoting in full is as follows: "There is no joined up thinking between government departments with regard to airspace and GA, with one department trying to close aerodromes and hence the airspace and another trying to promote GA whilst doing nothing to protect the airspace above them". Clearly ongoing strategic work on GA airfield networks, the newly enhanced place of such airfields in the National Planning Policy Framework (NPPF), and the government's policy and objectives on airspace must be linked, if the government is to meet its aim of the UK being the best place in the world for GA.

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