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DfT Aviation Strategy Team  
By email

13<sup>th</sup> August 2018

Sir/Madam

**BGA COMMENTS FOLLOWING THE AVIATION STRATEGY ROUND-TABLE  
DISCUSSION HELD AT CAA GATWICK ON 7TH AUGUST 2018**

Thanks for your time at the recent round table event and for agreeing that additional comments could be submitted for consideration as part of the same consultation process. We are encouraged to note that DfT recognises that it is important that the entire spectrum of GA activities is considered within the aviation strategy. Any aviation strategy that captures GA needs to carefully consider the surprisingly wide scope of different GA activity. At the one end of GA are business jets, that are essentially small airliners, and heavy/fast ex-military aircraft, and at the other end and far more numerous are the air-sport aircraft, including microlights, gliders, paragliders and balloons flown purely for recreational purposes.

Please note the following issues that we believe should inform the aviation strategy and influence the associated policy outcomes. As noted at the roundtable event, GA strategy needs to be clearly stated in the aviation strategy rather than assumed through some warm words in an introduction.

**1. Air sport is not the same as Commercial Air Transport**

Air sport, including gliding, is an adventurous activity within which its participants accept a level of risk. In gliding, safety is managed using standard SMS processes and tools. Stated priorities are not harming any third parties and avoiding any airspace infringements. While it is important for all sectors of aviation to continually seek to improve their safety, it is inappropriate to compare commercial air transport safety performance to that of GA (other than perhaps business jet operations).

**2. One size does not fit all**

It is of paramount importance that the aviation strategy avoids mistakes of the past by recognising that one size does not fit all and to specifically establish the need for;

- The application of regulation to each sector which is proportionate to the complexity of the aircraft and the nature of the flight operation in that sector.
- Only the minimum regulation needed to ensure flight safety, access to airspace, free movement and efficient and cost-effective organisation for operations

**3. Cost of Regulation**

As with other air sports, gliding is a fundamentally volunteer managed activity which is funded by its participants taxed incomes. Cost of regulation is a significant issue. The

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BGA has a long history of self-regulation, which in recent years has been challenged by emerging EASA regulation and resulting CAA oversight of previously self-regulated activity. As a result, a significant amount of representative effort in UK and further afield Europe continues by the BGA, which is primarily focussed on minimising the cost of and maximising opportunities for participation in the sport. In air sport, lower costs support greater participation.

#### 4. Air sports contribution to UK PLC

GA's financial and other contribution to UK PLC is well established within the current GA strategy. A less well-known fact is that air sports including gliding additionally contribute to the Governments sporting future objectives of physical wellbeing, mental wellbeing, individual development, social and community development, and economic development. These points need to be included in the aviation strategy.

#### 5. Airspace

It is no secret that the UK's airspace structure is barely fit for purpose and that airspace modernisation is overdue. It's extremely important going forward that airspace is designed and managed to meet the reasonable needs of all stakeholders, including air sport. The aviation strategy will of course refer to airspace modernisation and the CAA's role in developing the associated strategy. We are encouraged to hear DfT state that controlled airspace should be minimised. The huge challenge for GA is that there are currently no plans to apply a strategy to lower airspace beyond maintaining the status quo, ie to leave the shape and management of lower airspace in the hands of airports and ANSPs under the guidance of the CAA's CAP1616 process. The known problems with the way lower airspace is shaped and managed today demonstrate why this is will be catastrophic for GA other than business aviation.

It is clear that a new approach needs to be taken to lower airspace design. It is necessary to facilitate the development and application of agreed lower airspace design principles, and regulatory change may be needed to achieve this. The UK Aviation Strategy provides the context and opportunity to establish the much-needed policy position to underpin the new approach and associated regulatory change.

#### 6. Airfields

Gliding and most other air sports do not require the sort of infrastructure needed by air transport or business jets. A typical gliding airfield will include a combined launching and landing grass or similarly surfaced strip of some 1000m by 50m. Other than a windsock, a method of launching (by towing with an aeroplane or more commonly by cable using a winch on the ground), and a storage facility, little else is needed other than airspace to fly in. When considering a sustainable network of airfields, it is extremely important that due consideration is given to un-licensed airfields, air-strips and other aircraft launching and landing sites and their access to open airspace. It may be of interest that there are gliding airfields which produce far more movements per year than many of the UK's licensed airfields.

#### 7. STEM

GA including air sport provides a great environment for encouraging and developing our future aviation and aerospace professionals. STEM awareness including future benefits is growing in aviation including within GA. Partnerships with schools and colleges and recognition of aviation skills relevant to professional development is slowly getting off the ground. Its clear that there needs to be a joined-up approach across government to

ensure that appropriate policies are in place to prevent barriers when STEM and future employment related initiatives emerge.

We'd like to comment briefly on the Aviation Strategy policy principles presented at the round table.

The aim of the strategy includes meeting the needs of consumers. The currently stated DfT interpretation of 'consumer' includes the entire spectrum of GA activities. However, people and governments move on and the aviation strategy needs to include a clearly stated definition of 'consumer' that establishes the entire spectrum of GA as a consumer. As such, all the "consumer" activities/entities should be listed as part of the published definition.

The policy principle 'Consumer focussed' doesn't align with the aim or the definition of consumer. It appears to shift emphasis towards commercial air transport by simply referring to passengers and businesses. Presumably consumers use businesses to consume, that some businesses are consumers, and not all consumers are passengers or businesses. So how about 'Consumer focussed: put consumers at the centre of everything we do'.

There should be a policy principle that addresses regulation. Over-regulation does not only apply to GA. We propose 'Only regulate where necessary: a regulatory environment that is proportionate to the complexity of aircraft and the nature of the operation'.

Thanks again for agreeing to consider our feedback. We would be very pleased to discuss any of the related detail with you.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Pete Stratten', with a long horizontal line extending to the right.

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