

Response ID ANON-34E5-VKXQ-B

Submitted to **Airspace change: a decision-making process for PPR (planned and permanent redistribution of air traffic) proposals**
Submitted on **2019-07-04 13:53:04**

About you

A What is your name?

Name:

Pete Stratten

B What is your email address?

Email:

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C If you are affiliated with any organisation, please tell us its name:

Organisation:

BGA and General Aviation Alliance

Yes

D Are you answering as:

Representative / national organisation or institute

E Where do you live or where is your organisation based?

East Midlands

F Is there anything else that you would like us to know about you in connection with your response?

More info about respondent:

The BGA is the UK governing body of sport gliding and a member organisation representing the UK's 80 gliding clubs and their 7000 members and owners of some 2300 aircraft.

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 Model Flying Association (BMFA); 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.

G Do you consent to your response being published?

Yes, with personal identifying information (name, organisation, respondent category, location, additional information - please note your email address will NOT be published if you choose this option)

General observations

1 Overall, what are your views on the CAA's proposed PPR decision-making process?

Significant modifications needed

Overall approach - comments:

The ANSPs and airports are biased towards establishing route changes and airspace changes that benefit their own operations. We do not agree with a process that effectively results delegating responsibility for oversight of a PPR or any other airspace change to the ANSPs and airports.

The related points are summarised as;

- Ensure ANSPs and airports are aware of CAA interpretation and how that applies
- Require suitable triggers to be established by ANSPs
- Ensure CAA has regulatory oversight of the process including triggers
- Require consultation and engagement with GA stakeholders
- Where PPR should have been established prior to any ACP, CAA enforcement action must apply
- CAA should conduct the PIR
- An appeals process is required, for example to address impacts on other airspace users that have not been adequately considered

Identifying a 'relevant PPR'

2 Do you have any comments on the way the CAA is interpreting the definition of a 'relevant PPR'?

CAA definition of RPPR:

It is not clear how that interpretation will apply in a legal sense (ie beyond the advisory nature of a CAA CAP), and how airports and ANSPs will be aware of the interpretation, understand how to apply the requirements and how the process will be overseen.

3 The CAA proposes that an air navigation service provider must introduce an internal 'trigger' process alongside its existing safety assessment that will always identify where a proposed change in air traffic control operational procedure is a 'relevant PPR'. Do you agree that this is the most appropriate way for an air navigation service provider to identify when it must follow our proposed PPR process before implementing such a change?

Yes

Comments on trigger:

Yes re a trigger, but an important question remains about how the CAA will establish that the triggers are in place. There needs to be a regulatory process that ensures that ANSPs and airports are complying with the entire process including triggers.

Proposed PPR decision-making process

4 Are there any aspects of the CAP 1616 airspace change process that you think are missing from our proposed PPR process and should be included?

Yes, something more is needed

Anything missing - comments:

The CAA appears to be leaving it to the discretion of the proposer to decide who to consult.

How will GA be made aware of PPR changes and how will proposers know which GA stakeholders need consulting with?

Clear direction is required within the process.

5 Where a PPR is proposed, can multiple workable options be developed for the change in air traffic control operational procedure, or are the only options either to do the PPR or to do nothing (i.e. a binary choice)? Please answer for each of the three types of relevant PPR.

Multiple or binary options? - Type 1:

Don't know

Multiple or binary options? - Type 2:

Don't know

Multiple or binary options? - Type 3:

Don't know

Multiple options - comments:

No comment.

6 Do you agree with our proposal that it is the air navigation service provider which produces a post-implementation report (as to whether the change has had the impacts and benefits predicted) rather than the CAA?

No, something more is needed

PIR as ANSP report - comments:

We don't agree. The PIR process used under CAP725 has proven to be ineffective. The CAP1616 PIR process is untested.

The CAA needs to be engaged in the production of all PIRs, including PPR PIRs.

Temporary changes

7 Do you agree with the CAA's proposal that it would be proportionate to apply a scaled process for a temporary 'relevant PPR' proposal lasting no more than six months?

No

Temporary changes - comments:

The issues we have described relating to permanent PPR changes apply, including a requirement for CAA direction and oversight of process.

Implementing the new process

8 Is there anything specific that the CAA can do to aid the implementation of our proposed PPR decision-making process?

CAA aiding implementation:

No comment.