Response ID ANON-ZTPW-A5CM-U

Submitted to CAP1616 Airspace Change Regulatory Guidance Review- Engagement
Submitted on 2021-11-08 13:49:55

About you

Are you responding as a:

Member of the general aviation community

Other (please specify what type of respondent you are)::
British Gliding Association Ltd

Priorities for the CAP1616 Review

What do you think the review of the CAP1616 airspace change process needs to address the most?

Please tell us why you have responded in this way?:

Design principles are secondary to design objectives. This is a critical distinction. There is little merit in spending time and effort on process or principles unless there is absolute clarity on what the proposer is intending to achieve. ACP sponsors have all too often decided on their preferred solution to a perceived problem and spent the rest of the time trying to bulldoze that "solution" (created in isolation and often in genuine ignorance of the interests and behaviour of other airspace users) through the process and in some cases, extend the scope of the ACP beyond the statement of need. CAP1616 needs to ensure that sponsors approach other airspace users with the perceived problem, not with a pet solution. This would allow pre-ACP statement of need co-operative problem solving which might well deliver faster, cheaper, better solutions to the original problem. As a minimum it would deliver a common understanding of desired outcomes against which any changes could be assessed. The Statement of Need should be a declaration of a problem or aspiration that a sponsor has. This should trigger engagement with all stakeholders for collaborative discussion driving potential options for resolving the issue, which in turn should lead to relevant, appropriate and acceptable design principles.

Clarity of CAP1616 Regulatory Requirements

How clear is CAP1616 at specifying what the Civil Aviation Authority's (CAA) regulatory requirements are?

Clear

Please tell us why you have responded in this way?:

CAP1616 is reasonably well written.

Stages/Steps/Gateways in CAP1616

Do you think the number of stages/steps/gateways is appropriate?

Number of stages/steps/gateways - Stages:
Yes, it feels right

Number of stages/steps/gateways - Steps:
Yes, it feels right

Number of stages/steps/gateways - Gateways:
Yes, it feels right

Information During the CAP1616 Process

During the airspace change process, does the CAA provide enough information to you?

No

Please tell us why you have responded in this way?:

It is not always clear what involvement the CAA has had in a sponsor deciding to launch an ACP and the CAA's involvement in coaching the sponsor in the type of airspace change being proposed.

Scaling of the CAP1616 Process

Do you agree or disagree with the following statements about scalability in the CAP1616 process?

adequate apprporiate scaling opportunities - There are enough opportunities in the CAP1616 to scale the process:
Agree

adequate apprporiate scaling opportunities - The extent to which the CAP1616 process can be scaled is appropriate:
Agree

Please tell us why you have responded in this way?:

Our experience is that when applied to large and small ACPs, CAP1616 appears to be equally effective.

Public Evidence Sessions

Should the CAA keep the option of having a Public Evidence Session?

Yes

Please tell us why you have responded in this way?:

Formal Gateway for Temporary Airspace Changes and Trials

Should we provide a formal gateway for temporary airspace changes/trials in advance of targeted engagement/consultation commencing?

Yes

Other Comments

Are there any other comments you'd like to share with us with regards to the CAP1616 Airspace Change process? Please share them below:

Additional comments:

Gateway reviews
The current process does not assure the CAA that stakeholder input has been given appropriate credence by the ACP sponsor. Whilst we are not proposing additional stakeholder input to the process, it is recommended that there is some form of stakeholder representation or feedback mechanism during Gateway Reviews. That could be as simple as the stakeholder registering support or otherwise.

Post Implementation Review (PIR)
The post implementation review process requires CAA to review several data points re the new airspace and its operation. There is no review of the impact on airspace users operating immediately outside of and effectively excluded from airspace that was previously accessible.
To quote how the CAA will review actual v predicted CAT movements following an ACP, 'the CAA will consider the extent of any difference between the predicted and actual traffic figures and the extent to which the impacts of the change can be explained by those differences'. This methodology indicates that aspirational hockey stick growth figures commonly used as justification for controlled airspace are encouraged as they will only result in adverse comment in the PIR stage if those inflated numbers directly relate to a change impact. However, the review process does not consider the change impact on those operating outside the new airspace. It should do so.

Reclassifying controlled airspace
CAP1616 is designed primarily to consider growth of controlled airspace. Where airspace is reverting to class G through review or as a result of changing circumstances (eg reduction in CAT movements) it should be possible to accommodate the change within a CAP1616-lite that addresses the specific issues associated with removing controlled airspace and removes those specific to increasing controlled airspace.