

Response

Submitted to Draft Airspace Modernisation Strategy 2022-2040
Submitted on 2022-03-31 18:30:01

About you

A Are you responding in an official capacity on behalf of an organisation?

Yes

Organisation name:
British Gliding Association

B What is your name?

name:
Pete Stratten

C What is your email address?

Email:
pete@gliding.co.uk

D Are you answering as:

General Aviation (GA), including representative organisations

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?

Anything else about you?:

The British Gliding Association (BGA) represents the interests of all gliding clubs in the UK and some 7000 glider pilots and owners of around 2200 aircraft.

The BGA is a member of the GA Alliance and supports the A4AT/GAA response to this consultation.

The BGA looks forward to continuing to work with the CAA and other stakeholders to develop and implement fit for purpose modernised airspace.

G Do you consent to your response being published?

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(organisation, name, respondent category, location, additional information - please note your email address will NOT be published if you choose this option)

Views on the overall strategy

1 Do you agree with our overall approach in the refreshed Airspace Modernisation Strategy?

major modifications needed

overall approach reasons:

We offer the following detail.

General.

The draft AMS does indicate CAA intent for a more efficient and positive future for all airspace users. The concepts of integration and flexibility that provide access to more airspace along with pilot managed trajectory are positive.

Detail within the draft AMS suggests a disconnect between those positive AMS concepts and what ATC experts are inputting into the strategy. For example, much of the draft AMS delivery appears to be predicated on aircraft using an ATC service, which is counter to the view that the strategy should where possible be facilitating the removal of the need to be tied to an ATC service.

It is difficult to visualise within the draft AMS what modernised airspace will look like. The same applies to how the benefits will be delivered.

It is noted that AMS delivery and how it will be paid for are not described in any detail.

Proposed developments within the draft AMS that are supportive of recreational GA operations are couched in terms of possibly or potentially. Unless the AMS is designed from the outset to deliver change that supports all stakeholders including recreational GA, future budgetary challenges will result in a far worse situation than is currently the case.

It appears that the impacts of several elements of the strategy have not been tested against a range of GA activities, for example gliding operations.

The Government and the Regulator use the term General Aviation (GA) as a catch all for activity other than CAT and military flying. An important and the largest subset of GA is described by its participants as 'recreational aviation', which includes gliding. 'Leisure flight' isn't a generally recognised description, presumably as that could include holiday flights, which constitute a large part of most airport commercial air transport activity.

Airspace Classification and Design.

Over recent years, the BGA has responded to a variety of CAA airspace modernisation and design engagements and consultations. The BGA is aware of at least one CAA working group that has been working on future airspace concepts that to date appears to have had little external scrutiny or engagement other than with the military.

The draft AMS leans on possible new concepts developments in airspace design that will potentially improve integration, but also describes changes that in reality will increase segregation through vastly increased controlled airspace. Stated justification for changes that increase volumes of controlled airspace by developing CTR's around airfields that provide control to IFR traffic include alignment with ICAO, and EASA requirements which are not legally required in the UK. While it is right to refer to policy developments and propose changes to facilitate airspace modernisation within the AMS, policy development and decisions should of course be subject to the normal processes of engagement and consultation.

New airspace users are pushing forward ahead of electronic conspicuity and see and avoid technology developments, airspace design, and airspace policies. There is a significant timing challenge ahead in terms of balancing the apparent needs of RPAS development v shutting off large volumes of airspace that doesn't appear to be addressed in the AMS.

PBN design and the associated containment policy results in more controlled airspace than previous traditional procedures. An innovative and flexible containment policy that supports the AMS aim to minimise controlled airspace is needed. Examples of expanding airspace under PBN include Glasgow (already the largest CTR in the UK) and Edinburgh, both of which have both declared increases in controlled airspace requirements because of PBN requirements. Unless containment and other airspace policies are modernised by CAA, volumes of controlled airspace and therefore segregation will continue to increase as CTRs and CTAs subject to change under PBN are cemented in place.

Minimising airspace design is very much at the whim of the sponsoring airport which has to develop its own design baseline. To help address that the AMS should include the development of an airspace design 'playbook' that provides standard templates relating to IFR traffic volumes and associated modernised policy positions. ACP applications should be assessed diligently against those design templates and policy positions. Associated traffic projections should be challenged intelligently.

The CAA's airspace classification review has evolved so that is no real impact on established controlled airspace. CAA has already excluded any airspace that has been or will be subject to an ACP from the scope of the review and has excluded any airspace that could have an impact on the military. It would be beneficial for airspace review findings to be factored-in as a part of the required development of any ACP.

Assumptions.

The AMS notes that "collision risk is greater around smaller aerodromes with no surveillance capability themselves and in areas of high density".

Several small airfields provide far better total system situational awareness through use of EC than most larger airfields, which are entirely reliant on a human controller who in most cases will struggle to provide effective MAC risk reduction, particularly where multiple aircraft are involved. Great care is needed to ensure CAA policy is not informed by assumptions.

Electronic conspicuity.

The AMS does not clearly identify whether or how ANSP's will be required to equip to be interoperable with any electronic conspicuity other than Mode S transponders. NATS has made its position clear, limiting its ADS-B capability to offshore only. Military ATC units are not funded for ADS-B interoperability. There is no indication that other forms of electronic conspicuity that currently and increasingly provide a large part of GA with effective supported lookout and MAC risk reduction, have a place in the AMS. That is a significant concern.

A clear, expertly informed, risk-based, and well-defined electronic conspicuity road map is needed. Without that road map, it is difficult for the reader to understand how and when various changes and benefits that are reliant on electronic conspicuity can be delivered within the strategy.

Environment.

Aircraft using RNAV departures replicated from old procedures are flying lower, using more fuel and with an increased environmental impact compared to legacy procedures with controller intervention. Airport ACPs are presently cementing the position of the interfaces with upper procedures which will saddle the future airspace with environmentally damaging instrument flight procedures. The draft AMS does not make clear how that established sub-optimal airspace situation will be addressed going forward.

2 Have we captured the drivers for change adequately in Part 1, Chapter 2?

no

missing drivers:

The BGA recognises the need to consider international standards.

However, it is noted that the draft AMS describes the need for the establishment of controlled airspace wherever an ATC service is provided, citing a requirement to comply with ICAO standards but omits to note that ICAO and UK law allows the UK to establish differences.

The BGA and wider recreational GA has made clear in writing to the CAA and DfT on numerous occasions that such a policy will result in a 300% increase in lower controlled airspace.

The BGA would like to be assured that the CAA is not using this very detailed and therefore not widely absorbed consultation as a cover to implement new airspace policies that will have far reaching and damaging impacts on recreational GA. We provide detail later in this response.

3 Have we identified the right stakeholder groups in Part 1, Chapter 2?

yes

Describe missing stakeholder group:

Views on the delivery 'elements'

4 What are your views on the nine delivery 'elements'?

major modifications needed

Comments on delivery elements:

Table 4.3 item 9 describes electronic conspicuity for all aircraft <5700kg. The BGA recognises that electronic conspicuity is an essential enabler for greater integration. However, the AMS draft does not describe what 'electronic conspicuity for all aircraft <5700kg' means. Without the detail, the reader cannot understand the statement's implications.

User case 2 introduces a significant change indicating that it is mandated, when in fact under UK law it does not need to be, ie "Aligned with ICAO Standard and Recommended Practices (SARPs) and Procedures for Air Navigation (PANS), hence air traffic control service provided only in controlled airspace with ICAO Flight Information Service (FIS) outside of controlled airspace, when not co-provided with an air traffic control service." The impact will be to increase low level controlled airspace by some 300% by requiring CTR's around those airfields. The AMS cannot be predicated on changes in policy that fit an ATC-centric vision that have yet to be subject to specific full and effective engagement and consultation. In this case, the draft AMS incorrectly indicates that the change is a legal requirement and therefore a given.

5 Part 3 of the AMS will cover who is responsible for deploying the delivery 'elements' and related activities, and how. At this early stage, what are your views on any requirements we should have for those tasked with the deployment of those elements and activities?

views on requirements for those tasked with delivery:

Whatever delivery restructure or working group development takes place, it is important that there is equitable and well-informed representation. A classic justification used by CAA to illustrate that recreational GA needs have been addressed is that a working group CAA or military person is or was a GA pilot. That person's experience may be valuable but falls short in terms of being fully informed. This can only work with agreed representative expert involvement from recreational GA.

The BGA has pressed hard for the development of charity (the A4A Trust) that can support GA needs by engaging on the AMS and associated activities. We would expect the CAA to support a structured and meaningful recreational GA engagement process going forward.

Views on AMS governance

6 How effective has the AMS governance structure been, for example in terms of overseeing delivery of the strategy, stakeholder engagement or transparency?

wholly or mostly ineffective

explain modifications to governance:

We have identified ineffective as there is little or no feedback on how the governance is working. It appears that the AMS and associated policies are being developed by CAA and overseen by CAA.

It is telling that in the Governance Organisation chart, the (2019) GA engagement organisation is detailed as 'Airspace 4 All', which seems to indicate a misunderstanding about how recreational GA is structured where appropriate to provide an 'industry' input.

7 The refreshed strategy is broader in scope. What changes to governance are needed to deliver the broader strategy, including future approaches to funding?

Views on how to deliver broader strategy:

Integration is clearly important. As we discuss earlier in our response, there is a significant issue with airspace developments running ahead of modernising developments, including for example technology (eg EC), policies (eg re containment) and tools (eg design playbook). Although we had initially anticipated that the ACOG would adopt a role of co-ordinating those AMS activity/developments and therefore could address that important point, it's clear that ACOG is established to co-ordinate airports ACP's. Therefore there does not appear to be the necessary governance process in place.

It needs to be made clear to the DfT by the CAA that without funding, a meaningful AMS delivery cannot be successful.
A funding strategy and associated oversight group is needed.

The BGA looks forward to continuing to work with the CAA and other stakeholders to develop and implement fit for purpose modernised airspace.