British Business and General Aviation Association

Marek Kubala
Inquiry Manager
Transport Committee
House of Commons
7 Millbank
London SW1P 3JA

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Dear Mr Kubala,

The Use of Airspace

As part of your wider engagement with stakeholders, I am pleased to take this opportunity to submit written evidence on behalf of the 170 members of the British Business & General Aviation Association (BBGA).

The BBGA's members are engaged in a wide variety of activities within the General Aviation sector; including the operation of aircraft, maintenance, handling, airfield operation and insurance, among others.

Our aircraft-operating membership is almost exclusively made up of companies which use their aircraft as workhorses; either to train pilots or as a means to increase the efficiency of their own or their client's main business. The businesses that our members operate are not extravagant or run on a 'money-no-object' basis; they are businesses operating on margins comparable with other areas of industry, and either competing against foreign companies for work throughout Europe, or using their aircraft as a productivity tool for their own management team. A European Commission paper entitled "An Agenda for Sustainable Future in General and Business Aviation" published on 11th January 2008 has been provided to Government personnel and gives an idea of the important role which the commission recognises is performed by General and Business Aviation.

The 2003 White Paper understandably focused on the role of Air Transport in an ever more congested world. Looking back at the document today, it is apparent that the role of Business & General Aviation was in a large part overlooked. During the same time period, valuable Business & General Aviation has continued to be displaced from congested hubs in favour of scheduled Air Transport services, on the principle that "a full aircraft is an efficient aircraft." BBGA takes issue with this underlying sentiment, and believes that the United Kingdom needs to start challenging these perceived truths, and start to legislate to protect access to scarce resources by all users.

There is a consultation currently concerning the likelihood of London City Airport, a key Business Aviation hub, becoming fully co-ordinated. This will have direct impact on the City of London and our country's ability to generate wealth as we seek to recover from the present economic downturn. Luton is next, where today Business Aviation traffic makes up more than 22% of the movements. The large air carriers and the operators of the airport terminal shopping malls have scored a march on the small but comparatively far more valuable Business Aircraft user, and it is important to redress this imbalance. It seems anachronistic that a scheduled carrier laden with party-goers destined for a cheap weekend in Prague should have the legal right to displace traffic of far greater net worth to the British economy, but that is the case today.

In terms of airspace utilisation, our membership is ready and equipped to take advantage of the latest technologies and infrastructure improvements. These changes typically occur at a much slower pace than we would like. The introduction of 8.33kHz spacing for VHF comm radios is a case in point: All aircraft above FL245 have been required to carry this equipment in Europe since 1999, and yet the first UK 8.33kHz frequency was not introduced until 2005. Time and again, it seems as if the users are forced to 'invest' in infrastructure improvements, which for one reason or another turn out to be illusory at best or non-existent at worst. The current SES programme is vital for European airspace efficiency, and should be accelerated by EU Member States.

Summary
UK Aviation policy has been inattentive to the needs of Business and General Aviation for too long. To redress this imbalance, BBGA makes twelve key recommendations, as follows:

1) Economic value (including induced value) should be at the heart of every UK aviation policy decision.
2) Congested UK airspace should be addressed in an integrated fashion with those of its neighbours to enable rapid efficiency improvements.
3) Business & General Aviation should be given access rights to scarce resources which could then in turn be used as a model to protect low-cost carriers as Cap and Trade starts to impact their business model.
4) Airport capacity limits should be set with the primary aim of maximising the efficiency of the Air Traffic System
5) A systematic, cross-functional approach to airspace safety should be undertaken, with a data-driven approach to improving safety statistics.
6) The United Kingdom should re-double its efforts to drive up European Airspace efficiency metrics through the SES programme as executed by EuroControl.
7) The UK government should make it clear to the electorate that 'lifestyle' consultation responses will be of progressively lower value in the decision process in order to speed up attainment of environmental goals.
8) Government should speed the IPC and give it a clear brief including strategic principles for General Aviation and associated assets.
9) The UK should adopt a clearer, risk-sharing, approach to airspace efficiency initiatives, with the UK provider bearing financial risk in the event that promised efficiencies do not materialise despite investment by users and the agencies concerned.

1 What changes to the management of airspace could be required as a result of the additional airport capacity outlined in the 2003 White Paper? Are the White Paper's projections for increased passenger demand still accurate? Are all the measures to provide for increased passenger demand likely to be implemented?

Business Aviation comprises about 8% of Instrument Flight Rules (IFR) traffic in Europe. Recently, a Communication from the European Commission entitled "**An Agenda for a Sustainable Future in General and Business Aviation**" dated 11 January 2008 COM (2007) 869 Final stated that "*General and Business Aviation provides closely tailored, flexible, door to door transportation for individuals, enterprises and local communities, increasing mobility of people, productivity of businesses and regional cohesion*". As such, Business & General Aviation operates from a range of airports and aerodromes transporting people and goods directly between the two ends of their journey. For Business Aviation to function efficiently, it must have equitable access to all airports and the airspace must be managed with maximum efficiency as its goal. And yet, in the UK we see airport capacity limits being set no in relation to what makes sense from an airspace design point-of-view, but purely from the point-of-view of what makes sense to people living around an airport. The recent decision backing the expansion of Stansted Airport, General Aviation less than 10 seats was handed an arbitrary limit of 10,000 movements which was inserted by local government representatives without consultation and without any clear reason for doing so. That GA can be marginalised at the hands of local government without the DfT being aware is a result of not having an inclusive plan for access to scarce resources by all forms of aviation.

In the mid-term, it seems unavoidable that significant investment will have to be made to improve the efficiency of some UK airspace nearing its capacity limits. For example the London TMA is already at its limits at some periods. Single European Skies is designed to improve the interoperability of adjacent airspace blocks, and it seems sensible to press ahead with these advanced navigational capabilities without delay.

In the light of governmental targets for climate change mitigation, it is likely that long-term aviation traffic projections will have to be scaled back. At some stage, we as a society will have to decide whether we are content to allow only the richest to travel by air, or whether a more equitable sharing of resources is possible. BBGA would like to see this equitability addressed now in terms of airport access and airspace design. Once appropriate ratios are arrived at for all users to share scarce resources, they could all be scaled back as necessary to meet environmental obligations.

Recommendation 1: Economic value (including induced value) should be at the heart of every UK aviation policy decision.

Recommendation 2: Congested UK airspace should be addressed in an integrated fashion with those of its neighbours to enable rapid efficiency improvements.

Recommendation 3: Business & General Aviation should be given access rights to scarce resources which could then in turn be used as a model to protect low-cost carriers as Cap and Trade starts to impact their business model.

Recommendation 4: Airport capacity limits should be set with the primary aim of maximising the efficiency of the Air Traffic System

2 Can safety be maintained as airspace is increasingly utilised? Is there a suitable interface between military and civilian arrangements for Air Traffic Control?

The UK can be justifiably proud of its ATC safety record, including the interface between civil and military control. The forthcoming ATSOCAS changes will further improve the interface in areas outside Controlled Airspace, and the work of NATS and the CAA in this area is to be applauded.

However, in some areas it is apparent that the views of industry concerning safety are ahead of the authorities; for example, the following are established BBGA positions on safety:

- The mandatory carriage of TCAS II / ACAS in congested airspace, regardless of aircraft weight.
- The mandatory requirement for two-crew operation of complex aircraft in congested airspace.
- The introduction of high-performance procedures to suit business jets arriving and departing at airports.
- The redesign of airspace to harmonise transition altitudes.

The adoption of the four points above would significantly enhance operational safety for all users of congested airspace, and should be addressed in a cross-functional manner involving industry and the various agencies involved. We would encourage a systematic approach to safety in UK airspace, and an approach to apply six sigma methodologies across the functions involved in safety regulation, airspace design and aircraft operation.

Recommendation 5: A systematic, cross-functional approach to airspace safety should be undertaken, with a data-driven approach to improving safety statistics.

3 Is the current approach to planning and regulating the use of UK airspace adequate? Would an Airspace Master Plan covering the period of the White Paper be beneficial? Could a piecemeal approach to individual developments necessitate additional redesigns subsequently?

The UK, taken individually, manages its airspace well. However, times are changing and a new approach is necessary for airspace management. Increasingly, the interface between UK airspace and those of neighbouring Member States are the bottleneck for efficiency improvements, and it is here, as part of a EuroControl / SES initiative that the UK should focus its efforts.

Recommendation 6: The United Kingdom should re-double its efforts to drive up European Airspace efficiency metrics through the SES programme as executed by EuroControl.

4 How are the effects and aircraft noise taken into account when changes are made to the use of airspace? Who should be consulted about such changes? How should the balance between conflicting interests be struck?

BBGA's belief is that recent consultations have been well-run and fully inclusive. The care taken with the recent TC North consultation really underlines that point. However, it will become necessary, in order to meet CO2 targets adopted by government, increasingly to override the 'lifestyle' views of consultees in the interests of the greater good of reducing climate change. These unavoidable consequences of government policy relate to all aspects of human activity and not just aviation, and should be made clear to the population as a whole without delay.

Recommendation 7: The UK government should make it clear to the electorate that 'lifestyle' consultation responses will be of progressively lower value in the decision process in order to speed up attainment of environmental goals.

5 How does the management of airspace in the rest of Europe affect flights into the UK? Is there an opportunity to integrate our plans for changes to airspace management more effectively with those of other European countries?

The design, planning and management of airspace in Europe needs to move towards increased levels of integration, including integration across national boundaries. The European Commission has made it clear that it will not accept national 'interests' to override the creation of effective and widespread Functional Airspace Blocks (FAB's) which are widely accepted to be the primary method of driving airspace utilisation efficiency up, and user costs down. Airspace users are impatient for these changes, and look to national governments to speed the long-awaited improvements to international airspace design.

6. What opportunities are there to apply new techniques and technologies to reduce wasteful flying on indirect routes and excessive 'stacking' while planes wait to land? How can the potential of any such opportunities best be realised? Could environmental benefits be gained as a result of such improvements?

Clearly there is a major role for technology to improve efficiency and reduce environmental impact of aviation. The following areas of focus are the most important:

- The adoption and use of Required Time of Arrival (RTA) as a collaborative tool to sequence arriving traffic, especially long-haul flights.
- A seamless approach to flow management including all aspects of the journey, gate-to-gate and across international borders.
- The application of user-defined trajectories for the enroute phase of flight.

7 In relation to the redesign of UK airspace, is the allocation of the roles and responsibilities of each of the interested parties – Department for Transport, the CAA, airport operators, NATS, etc – appropriate and clearly understood? Are the structures of the parties appropriate for undertaking the roles that they should play?

BBGA's belief is that there should be greater strategic cohesion between the domestic agencies listed. For example, no one is clearly tasked with safeguarding aerodromes with the result that many are facing threats from development on or near the site of the aerodrome. There is no plan relating to the distribution of aerodromes and how they should interface with airspace to make maximum use of available capacity, with the result that we as a country will almost certainly not end up with an optimally designed airspace infrastructure. A more inclusive version of the White Paper analysing the entire inventory of the nation's assets would be welcomed by this association.

As stated above, the future of an efficient airspace infrastructure is increasingly going to have to look outside our national borders for solutions, and it is here that linkages need to be greatly improved. EuroControl should be required to coordinate national ATC agencies in such a way that the efficiency of the network as a whole is optimised.

8 Do airspace management considerations delay the planning processes in relation to airport development proposals? How will airspace management considerations be taken into account by the proposed new Infrastructure Planning Commission and the relevant National Policy Statements on airport planning?

Airspace management considerations seem to play at best a minor role in airport development proposals. The Infrastructure Planning Commission must be independent from Government, but set within a clear national policy framework. This framework is largely absent outside the largest airfields and scheduled carriers. Establishing a national spatial infrastructure plan that includes the needs of General and Business Aviation will be key to establishing where major projects will be located and why. This must be linked into airspace considerations, as aviation infrastructure consists of both land and air assets.

The Farnborough airport situation is a case in point. Its owners have clearly invested millions of pounds into the development of perhaps Europe's finest and most modern Business Aviation terminal. And yet, it operates under movement limitations dating back to its days as a military establishment and decided in isolation from any airspace considerations. Clearly, if the UK is serious about multi-modal sustainable transportation policy, this is nonsensical. It is BBGA's hope that the IPC can address this situation.

Recommendation 8: Government should speed the IPC and give it a clear brief including strategic principles for General Aviation and associated assets.

9 What could be the implications for smaller airfields, recreational flying and helicopters of changes to airspace management to enable safe and efficient increases in capacity at the UK's major airports? How should an appropriate balance between conflicting priorities be determined?

If traffic is to increase at major airfields, the requirement for controlled airspace will certainly increase. The impacts to recreational and other users can be mitigated to some extent by adopting new technologies and procedures. Appropriate balance between conflicting priorities should be resolved through a value test. The majority of airline passengers are engaged in a leisure activity (vacation), comparable to the leisure pilots in GA. At some future stage we are going to have to invent a method of comparing the value and desirability of these and other activities which compete for a share of finite resources, be they infrastructural or actual. A low cost airline carrying passengers for one Euro each way does not contribute much to the National economy beyond the value of the fuel they burn.

10 Will it be possible to recruit and train staff in order that airspace changes can be implemented in parallel with additional airport capacity?

Yes.

11 Who should fund airspace changes? Is there likely to be enough funding to undertake the redesign required to bring about the necessary additional airspace capacity?

Recent events have clearly shown than anything is affordable if there is sufficient will to do so.

To date, users have funded airspace development and design through user fees, and there is no reason to assume that this principle will change in a wholesale fashion. However, the returns to users in the form of promised savings and efficiency gains have often been overstated at best or non-existent at worst. This needs to be addressed so that the agency/ies making commitments to efficiency improvements have more tangible commitment to a successful outcome. This could be in the form of a charging cap imposed in a similar fashion to rail operators which fail to meet standards agreed with their regulator.

At the light end of the operational spectrum, the Australian experience with ADS-B is worthy of study. In that case, the Australian government decided to share some of the cost-savings resulting from the decommissioning of radar stations to fund the adoption of Mode S ADS-B systems into light aircraft, which operationally would not have benefitted from the adoption of ADS-B, thus removing the last obstacle to the decommissioning of the radars and allowing the consequent cost-savings. This seems to be a pragmatic solution to a cost-benefit imbalance, which is worthy of imitation.

Recommendation 9: The UK should adopt a clearer, risk-sharing, approach to airspace efficiency initiatives, with the UK provider bearing financial risk in the event that promised efficiencies do not materialise despite investment by users and the agencies concerned.

Thank you for this opportunity to provide input into the future of Airspace in the UK. We very much hope that our response above indicates the level of thought that the BBGA has given to the topic, and look forward to engaging in further dialogue in due course.

In the meantime, I can be contacted at any time on the below numbers or via mobile phone on 07515-641889 if you have any questions on the content of this response.

Sincerely

Guy Lachlan
Chief Executive