

CAP1779: Proposed changes to VMC minima in class D airspace

APPG-GA Response

Q1: Do you agree with the CAA's assessment of typical weather conditions in the UK

The APPG-GA agrees with the CAA's assessment of the typical weather conditions which prevail in the UK. It is important to note that these conditions are different from most of the countries in which SERA currently apply.

Q2: Do you support the CAA's preferred option and the associated assumptions?

We do not accept the core assumption that the current arrangement must change as an absolute necessity. The current exemption on limitations for Class D works for General Aviation in the UK. It should be better recognised by those at EASA and ICAO that the prevailing climate in the UK, as evidenced by the CAA's data, necessitates some exemption on vertical distance from cloud to facilitate regular transits of Class D by GA. Basic Regulation flexibility provisions should be granted to permit continued exemption.

The consideration of this issue underlines the difficulties associated with excessively large volumes of Class D airspace that are an increasing feature of the UK's lower airspace. Minimising the size and volume of controlled airspace to that actually required is an increasingly pressing need that is not being addressed.

We agree that the CAA's preferred option (Option 4) is the most appropriate within the limited parameters defined in the call for evidence. However, this should not be taken as an acceptance of Option 4 given our serious reservations about the changes proposed.

We do not feel any of the options presented in CAP 1779 hold sufficient advantages over the current situation, when considering a wider picture, to warrant a change.

Q3: Do you agree with the CAA analysis of the projected workload change for ATC units and the effectiveness of the proposed mitigation?

The APPG-GA agrees with the CAA that a projected increased usage of SVFR will increase controller workload.

We also agree that Option 4 offers the greatest mitigations to this workload. Yet, we do not believe this mitigation will be sufficient and these proposals will lead to increased complexity for both controllers and pilots alike.

The proposal that the minima used in an entire block of airspace will be that observed by the tower will lead to inefficiencies.

It is possible that the visibility in the air nearby to an ATC tower or a part of controlled airspace away from the controlling airfield may be experiencing better visibility than at the tower location. Similarly, other areas could be experiencing worse visibility than at the tower.

However, even given this variation, having one standard by which controllers can work by would be the most viable option.

The removal of the requirement to separate SVFR traffic from other SVFR traffic would limit controller workload to an extent, but it is still important to note that workload will still be higher than is currently the case due to greater RTF demand from pilots requesting SVFR (as identified in CAP 1779 Para 4.10).

Q4: Do you agree with the CAA analysis of the potential impact on the provision of non-IFR flight? Are there any additional factors you feel should be considered?

The APPG-GA is concerned that these measures will negatively impact provision for non-IFR flight within Class D airspace.

As discussed above, controller workload will be a factor on days where conditions make SVFR necessary under the revised minima. If this is the case, then it is easy to imagine a situation where light GA will start to be regularly denied entry to airspace. This increases the mid-air collision risk and reduces the efficiency of those flights that are forced to transit around controlled airspace (CAP1779, Para 4.4).

Furthermore, we reject the assumption that SVFR procedures are common and well understood by Private Pilots. Currently the PPL syllabus only provides for the most basic understanding of what SVFR is. Student pilots are not required to practise these procedures, nor are they tested on SVFR transits in the RTF practical exam. For this proposal to be successful, training for pilots must change to place more emphasis on teaching the procedures to ensure efficient transit under SVFR.

If current and new pilots are not made more aware of SVFR procedures, then this will only increase the workload on the controllers having to talk to them. The workload for pilots using procedures they may not be familiar with would also be high.

Even a few instances of difficult or inefficient handling of the procedure would undermine the confidence of all parties involved. This would not only increase the likelihood of ATC denying entry for VFR pilots but it will encourage VFR pilots to simply route around controlled airspace, causing the increased risks associated with choke-points identified in CAP 1779 (Para 4.4).

If SVFR procedures are to become the most common way for GA to transit control zones, then their status in training must be elevated accordingly.

Q5: Do you agree with the CAA's assessment of safety impact?

Overall, the APPG-GA believes that the CAA's assessment of the safety impact does not address the whole picture and neglects an assessment of pilot behaviour.

We agree that improved separation from cloud will increase the efficacy of 'see and avoid' in Class D. We also agree that the proposed reduction to SVFR separation minima in visibility of 5km or more, at speeds of below 140, will not reduce safety.

However, it has been assumed that pilots will always request SVFR when attempting to cross Class D airspace whilst the cloud base is at or below 3,000ft.

Under current proposals, pilots would still have the option to transit without accepting SVFR if they complied with the visibility minima. This only encourages pilots to adopt a lower transit altitude below cloud, eroding the safety margin that higher altitude affords.

It seems reasonable to expect that some pilots, who are either not confident in SVFR procedures or simply do not want the hassle of the RTF workload, will choose to transit at low level.

The call for evidence doesn't contemplate that this scenario would not only be possible but also likely.

Furthermore, as discussed above, new measures make it more likely that pilots, either through their own choice or because of an ATC denial, will route around Class D airspace, increasing the collision risk at choke-points.

Therefore, the safety benefits should not be tested against the other options considered by the CAA, but rather it should be compared to what is available now. We feel that the CAA proposal offers negligible safety benefit over what currently exists.

Given that there is no safety justification for removing the current exemption, this exercise appears to be aimed at legislative tidying without regard for the impact on light GA.