

**Notes of the first meeting of the Light Aviation Airports Study Group  
held at Aviation House, Gatwick  
on 24<sup>th</sup> February 2005**

Attending:	Geoff Caton	CAA ASD	Chairman
	Ben Alcott	CAA SIDD	
	Inez Bartolo	CAA ASD	
	David Beaven	CAA GAD	
	Maria Boyle	CAA ATSSD	
	David Corbett	GASCo	
	Dr Tony Evans	CAA Medical	
	Chris Finnigan	BMAA	
	Paul Fleming	CAA ASD	
	Graham Forbes	CAA PLD	
	John Haffenden	AOA	
	Janet Hoare	BBGA/BHAB	
	Gary Phillips	CAA ASD	
	Dorothy Pooley	GAPAN	
	Tim Scorer	GA Airfields	
	Terry Slater	BGA	
	Barry Tempest	PFA	
	John Walker	AOPA	
	Gary Beaton	CAA ATSSD	Secretary

## **1 Introduction**

- 1.1 Ron Elder, Head of the CAA SRG Aerodrome, Air Traffic and Licensing Standards Division, opened the meeting by giving a brief presentation outlining the objective of Light Aviation Airports Study Group (LAASG) and some of the influences that will affect the practicality of the Group's work.
- 1.2 He noted, in particular, the dominance of changes in European regulatory arrangements and the plans of the European Commission.
- 1.3 Presentation slides are attached at Appendix A.
- 1.4 Following the presentation, a number of questions relating to the European influence were raised.

One area of interest was the scope of the LAASG to make proposals that do not accord with future European rules. RE assured the Group that any such proposals made would be presented at the appropriate European forum but that there could be no guarantees that the proposal would be adopted.

It was queried also, how much effect the European rules have on airports. RE outlined the recently announced plans to place responsibility for regulation of aerodromes and ATM with EASA, although no timescale for these changes has yet been determined.

## **2 Administrative matters**

- 2.1 Geoff Caton formally welcomed all Group members to the meeting and invited each participant to briefly introduce themselves and to indicate the organisations that they will be representing.
- 2.2 It was queried why the Group's title referred to airports, rather than aerodromes or airstrips, which would be more meaningful for the types of

operation under consideration. GC advised that, whilst he understood the point being made, he believed that the work of the Group was well defined and that the meaning of the term would be understood.

- 2.3 There was discussion about the starting time and location of meetings. It was agreed that meetings should continue to be held at Gatwick but should start at 1030 to accommodate those with long distances to travel.

### **3 Terms of Reference and Working Method**

- 3.1 GC noted that the current regulatory arrangements are considered by the CAA to be stable and safe. He advised, however, that the work of the Joint Review Team would likely result in changes to the charges made by the CAA for some aspects of its work. The Study Group's primary task was to review the current regulatory arrangements and to make proposals for changes that may reduce costs whilst maintaining an appropriate degree of safety oversight. He stressed that this also offered the opportunity to resolve anomalies, particularly in legislation, that have developed over time.

- 3.2 GC presented the draft Terms of Reference (ToR) and invited the Group's comments.

There was some concern that paragraph 6, dealing with attendance at meetings, was unnecessarily restrictive. Some suggested that it would be preferable for Group members to send a substitute if they were unable to attend although it was noted that this had presented problems during similar work undertaken to develop the National Private Pilot's Licence. It was agreed to amend the ToR to permit substitution only if absolutely necessary.

- 3.3 GC advised the Group that due to other commitments he may be unable to Chair meetings beyond the Spring; Graham Forbes would then take the Chair.

- 3.4 Gary Beaton then presented the proposed Working Method.

- 3.5 There was general agreement that the proposals would enable the Group to do its work effectively. It was stressed that, as representatives of the Industry, it was incumbent upon group members to ensure the widest distribution of consultative material to those they represent. Thereafter, they would be responsible for filtering responses and presenting a consolidated view to the meetings, wherever possible. There was some discussion about the use of the internet and e-mail for distribution of information. Concern was expressed that large e-mail attachments were sometimes unusable (or simply never arrived at the addressee). GB advised that it was planned to have an area on the CAA website dedicated to the Group's work. Whilst this was primarily intended to make the output of the Group available to the public, he suggested that it may be possible to make material for review by Group members available in this way also. He agreed to investigate this possibility further.

**Action: Gary Beaton**

- 3.6 It was agreed that final notes of meetings should be made available within two weeks of the meeting taking place and that material for review prior to meetings should be available at least seven days before the date of the next meeting.

- 3.7 The agreed ToR and Working Method are attached at Appendix B.

### **4 Overview of previous work**

- 4.1 GC presented a brief summary of previous similar work conducted by the CAA leading, in 1996, to the introduction of the 'Special' category RFFS

cover. He also outlined work carried out in 2003 which concentrated on those licensed aerodromes at which flying training only was carried out, and included one proposal under which a Flying Training Organisation (FTO) would ensure that the facilities offered by an aerodrome were suitable and safe (although this proposal was not progressed in anticipation of the establishment of the LAASG).

- 4.2 A copy of this presentation (including some additional data that was not presented at the meeting) is attached at Appendix C.
- 4.3 Paul Fleming then summarised the present requirements placed on aerodrome operators and aircraft operators by ANO Article 101 *Aerodromes – public transport of passengers and instruction in flying*. He highlighted a number of anomalies and inconsistencies that arise from the present text. It was noted that although the legislation applies to microlight aircraft, a General Exemption to the requirements in respect of microlight operations had been in place for many years. Chris Finnigan was keen that, whatever the outcome of the Group's work, the regulation of microlight operations should not change substantially.
- 4.4 GC noted the recently introduced ICAO Standards and Recommended Practices (SARPs) relating to the certification of all aerodromes available to international flights and to flights for the public transport of passengers. There was some discussion about the practical application of these SARPs. GC explained that the SARPs and the associated Manual on the Certification of Aerodromes were open to interpretation in certain respects and that the manner in which the material would be implemented within the UK was still under consideration. It was suggested that it would be useful for Group members to review these documents; GB agreed to investigate the possibility of making them available on the CAA web site.

**Action: Gary Beaton**

- 4.5 GC also outlined the ICAO Universal Safety Oversight Audit Programme which is likely to highlight any deviations from ICAO SARPs.

## **5 Brainstorming the Group's future work**

- 5.1 Group members discussed anomalies that exist in ANO Article 101. There was considerable support for simplifying the present legislation. There was general agreement that one of the major costs associated with maintaining a licensed aerodrome is that associated with RFFS, although it was noted that there are other costs that may be more significant at specific aerodromes. Some members offered the alternative view that having an aerodrome licence provides cost savings, for example by reducing insurance costs, and that irrespective of the legislative obligations contained in the ANO, insurance requirements etc. may limit the commercial attractiveness of an aerodrome that chooses to operate without a licence.
- 5.2 There was also support for finding some form of 'half-way house' for some operations whereby the full licensing requirements are not implemented but an alternative, lesser, set of standards that provide adequate safety are used.
- 5.3 Whilst the Group has a 'clean sheet', it was agreed that the requirements contained in ICAO SARPs and European regulations have to be accommodated. There was some discussion about the differing arrangements that exist in some other European States. GC noted that many other States were having to review their present arrangements and that some States may be considering the regime applied in the UK.

- 5.4 There were concerns also that the increasingly demanding obligations placed on aerodromes by a variety of regulatory bodies were placing severe business pressures on some aerodromes. There was general agreement that the industry needs a viable entry level.
- 5.5 The key suggestions emerging from the discussions are summarised below:
- ◆ appropriate levels of safety would be maintained
  - ◆ all of the anomalies in Article 101 identified by the Group should be eliminated
  - ◆ the legislation should be simplified wherever possible
  - ◆ the arrangements in other States should be reviewed; UK operators should not be disadvantaged in comparison with operators in other States
  - ◆ it is essential for the future of aviation that a viable flying training sector exists within the UK industry
  - ◆ justification for some of the existing differences are no longer valid; for example, many microlights are essentially similar in design and operation to simple, conventional fixed wing aircraft
  - ◆ the Group should take an open-minded and holistic view when analysing existing or proposed arrangements; there are many factors other than aerodrome licensing or RFFS to be considered, just as there are more than flying training operations that may be affected.
  - ◆ JAR-FCL makes no mention of a requirement for a licensed aerodrome for flying training.

## **6 Actions**

- 6.1 Paul Fleming agreed to summarise the relevant aspects of ICAO Annex 14 and Doc. 9774 *Manual on Certification of Aerodromes*. Tim Scorer agreed to work with PF to identify the key elements of the documents.
- Action: Paul Fleming/Tim Scorer**
- 6.2 Barry Tempest agreed to update a Paper on the licensing of aerodromes for purposes of flying training that he produced 18 months previously, and to submit it for consideration by Group members. He also agreed to review ANO Article 101 with colleagues and to identify anomalies that currently exist.
- Action: Barry Tempest**
- 6.3 John Walker agreed, in consultation with colleagues, to investigate the implications of simplifying ANO Article 101 to utilise a 'break' point of MAUW 5700kg for certain requirements, and produce a Paper to encapsulate the work.
- Action: John Walker**
- 6.4 David Beaven and David Corbett agreed to co-ordinate an exercise to benchmark the arrangements in some other States.
- Action: David Beaven/David Corbett**
- 6.5 Gary Beaton and Inez Bartolo agreed to review the communication arrangements that can be used by the Group and to clarify the use of the website for distributing information.
- Action: Gary Beaton/Inez Bartolo**

## **7 Date of next meeting**

- 7.1 The next meeting is arranged for Thursday 31st March 2005, at Aviation House, Gatwick, starting at 1030.

Gary Beaton  
25 February 2005

# RON ELDER

## Head of Aerodrome, Air Traffic and Licensing Standards Division (AALSD)

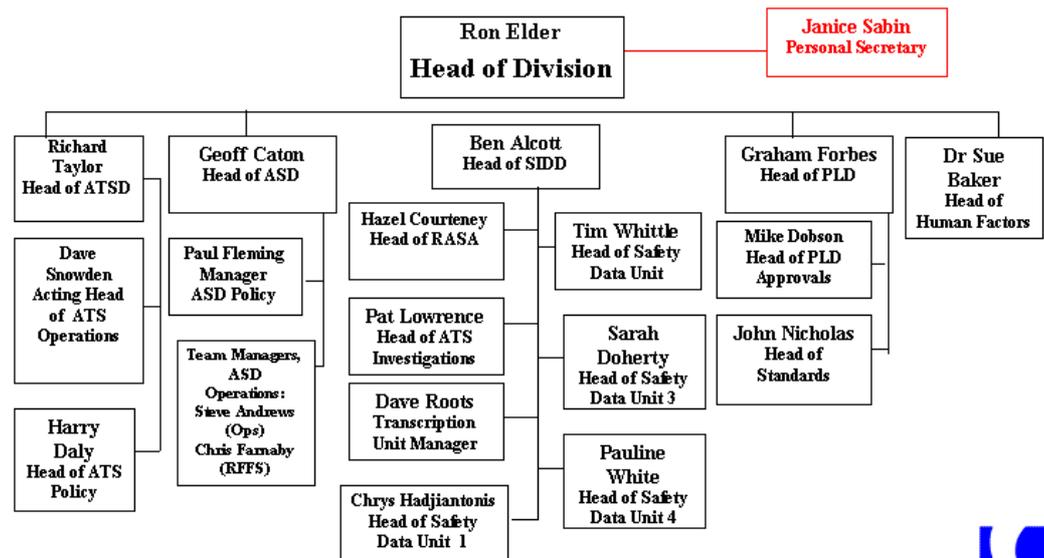
WELCOME!

Slide 1

Safety Regulation Group



### AERODROME, AIR TRAFFIC AND LICENSING STANDARDS DIVISION



Slide 2

Safety Regulation Group



## THE INTERNATIONAL REGULATORY SCENE

- ❖ ICAO – Universal Safety Oversight Audit Programme (USOAP)
- ❖ EASA - Up and Running
  - “Teething Troubles”
- ❖ SES - Moving along
  - Huge Agenda!

The latter both supervised by EC (different units)

- ❖ Other Players – JAA, ECAC, EUROCONTROL, EUROCAE

“The EC is the Only Game in Town”

Slide 3

Safety Regulation Group



## WHAT DOES THIS MEAN?

- ❖ Proceed with caution nationally
- ❖ Match the Pace elsewhere
- ❖ Stay close and influence
  - UK teams firmly embedded!
  - Major successes recently (EASA & SES CRs)

“Never under-estimate the scope for movement”

Slide 4

Safety Regulation Group



## UK CAA INITIATIVES

- ❖ Joint Review Team (JRT)
- ❖ General Aviation Spectrum
  - continual/measured review
  - within Legal boundaries
- ❖ Recent History supportive (e.g. NPPL; Restructuring internally)

“Risk-Based – Balanced – Proportionate – Sustainable”

Slide 5

Safety Regulation Group



## SO – PREPARED TO CONSIDER ALL ITEMS WHICH CAN BE MADE TO FIT INSIDE THAT FRAMEWORK

- ❖ Alter the level of Oversight
- ❖ More flexibility IF SAFE!
- ❖ Eliminate anomalies
- ❖ Benchmark other States

“MATCH YOU STEP FOR STEP”  
REPORT IN DECEMBER 2005

Questions?

Slide 6

Safety Regulation Group



**LIGHT AVIATION AIRPORTS STUDY GROUP**

**TERMS OF REFERENCE**

The CAA Safety Regulation Group (SRG) oversees UK aviation requirements, which meets the relevant international regulatory obligations. While a satisfactory safety régime currently exists in UK, SRG remains open to new ideas about how safety objectives may be met in the changing operational and legislative environment. The Light Aviation Airport Study Group (LAASG), whose membership has been drawn from areas of industry and regulatory departments concerned with ‘light aviation’ airports, and operations, has been established to address aspects of these obligations.

LAASG aims to provide an opportunity for creative thinking and the discussion and development of industry proposals, free from the restraint of preconceived assumptions. It recognises and reflects Industry’s desire to examine new regulatory concepts with the aim of meeting safety objectives in a practical, efficient and economically viable way.

2. In meeting this aim the LAASG will:
  - (a) Identify and assess the feasibility of potential changes to current regulatory arrangements and, in particular, to re-cast or eliminate inappropriate regulatory requirements and associated legislative anomalies;

- (b) Ensure that assessments of feasibility are where possible supported by verifiable data;
  - (c) Investigate and take advice on the legal implications of potential changes;
  - (d) Take account of regulatory arrangements in other States and Regions and of emerging International and European regulatory requirements and initiatives (e.g ICAO, JAA, EASA, Single European Sky) to avoid creating inconsistencies between UK, International and pan-European arrangements;
  - (e) Make recommendations for change to current regulatory arrangements,
3. The LAASG will report to the Head of Aerodrome and Air Traffic Licensing Standards Division (HAALSD) by 5 December 2005. The report will contain recommendations to the CAA intended to ensure that an appropriate level of oversight can be applied to light aviation airports whilst minimising associated regulatory costs. The report will address, *inter alia*, the following aspects:
- (a) Elements of the current regulatory framework perceived by Industry as inappropriate;
  - (b) Current arrangements deemed to be inappropriate or unnecessary (including the justification for their consideration);

- (c) Proposed amendments to regulatory arrangements;
  - (d) The implications of proposed changes, including operational safety legal cost aspects.
4. Interim reports shall be provided to HAALSD as and when the LAASG considers appropriate or necessary, for example, to gain approval to continue work on a particular matter.
  5. The LAASG will be chaired by Head of ASD with a Secretary and relevant representation drawn from CAA SRG staff, and members drawn from Industry who are considered best able to represent the interests of sectors affected by the matters under review.
  6. A quorum shall consist of the Chairman, Secretary and at least four Industry representatives. To ensure continuity, members shall not be substituted nor represented by proxy, if at all possible.
  7. The CAA SRG will host Study Group meetings (at Aviation House, Gatwick). Travel and subsistence expenses incurred by external members of the LAASG will, as is CAA practice, be borne by those members or the organisations that they represent.

## LIGHT AVIATION AIRPORTS STUDY GROUP

### WORKING METHODS

1. The Light Aviation Airports Study Group (LAASG) will meet at intervals of approximately six weeks. The frequency of meetings may be varied at the discretion of the Chairman to conduct the LAASG's work with optimum efficiency.
2. Material for consideration by LAASG members will be submitted to the Secretary and circulated to members by e-mail. When appropriate, the Chairman may request comments on such material to be exchanged by e-mail prior to discussion at meetings.
3. To make most efficient use of the time available, activity at meetings will, whenever possible, be limited to summary presentation of previously circulated material and discussion of that material.
4. The LAASG will identify topics considered to merit further investigation and record a brief summary of the potential or provisional impact or effect of each. Subsequent work packages, with clearly identified objectives and timescales for completion, will be established to conduct the detailed investigation.
5. At the discretion of the Chairman, the LAASG's work may be organised into two or more phases to facilitate the work in an efficient and orderly manner.

6. Industry representatives should endeavour faithfully to represent the widest practicable constituency of those affected by the work of the LAASG, irrespective of the organisation with which the representative is primarily associated.
  
7. Details of Industry representation, Terms of Reference and minutes of LAASG meetings will be publicly available on the CAA web site. Additional material will be made available at the discretion of the Chairman.
  
8. A dedicated SRG e-mail address has been established for communications with and within the LAASG. The address is: [laasg@srg.caa.co](mailto:laasg@srg.caa.co).



## LIGHT AVIATION AIRPORTS STUDY GROUP

### OVERVIEW OF LAASG/SCOPE (BRIEF HISTORY OF PREVIOUS REVIEWS)

LAASG – 24 February 2005

Slide 1



In 1996 a CAA Working Group comprising ASD, ATSSD, GAD, FLC and FOD representatives were tasked with identifying and then simplifying specific areas of CAP168 which could be applied to small aerodromes.

The Working Group proposed the following options to Industry representatives (mainly AOA, AOPA, GASCo, GAMTA, PFA and BHAB) :

LAASG – 24 February 2005

Slide 2



- a) **The introduction of a new type of aerodrome licence, applicable to small aerodromes conducting only flying instruction or flights for the purpose of public transport of passengers beginning and ending at the same aerodrome (A to A flights)**
- b) **Revised and simplified RFFS requirements; and**
- c) **A new CAP setting out the revised requirements**



**The initial reaction from Industry was supportive, especially with regard to the flexibility of RFFS requirements. However, several issues were raised:**

- a) **The need for a new category of licence was not accepted by all**
- b) **The definition of a 'small aerodrome' could not be agreed, and**
- c) **Aerodrome operators whose operations were not covered by the review, ie those that had limited scheduled public transport services, complained of potential commercial disadvantages**

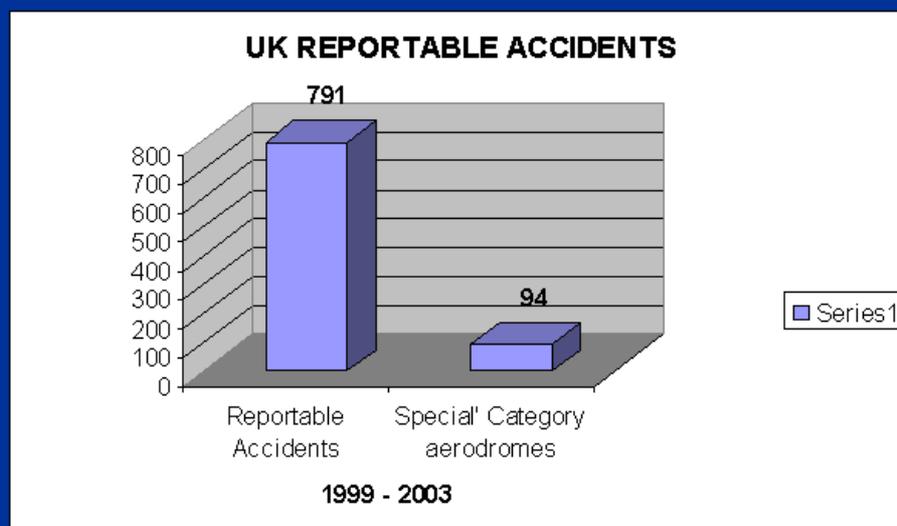


The task finally ended with a single, tangible outcome: the RFFS 'Category Special', covering operations by fixed-wing aircraft, up to but not including 9m in length, which are engaged in flying instruction; also, helicopters of overall length including the tail boom and rotors, up to but not including 15m, engaged in flying instruction.

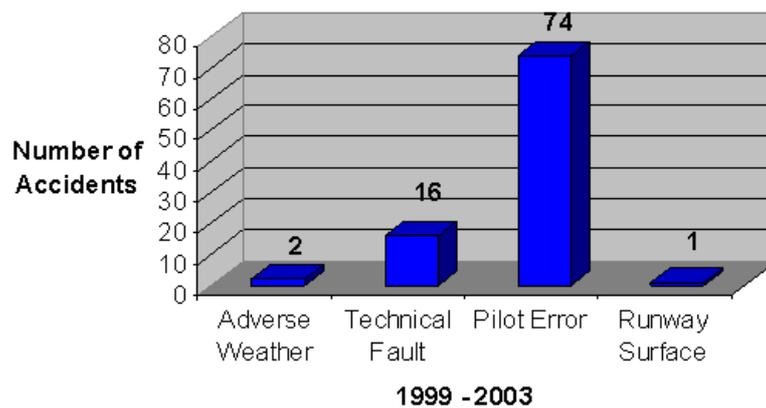


In 2003 the Low Category Aerodromes Team (LCA Team) was formed to look at accident statistics, as a pre-cursor to this important Light Aviation Airports Study Group. As the SG progresses with its review, accident statistics will be made available, as required.

- **The 2003 review looked at, amongst other things, whether a licensed aerodrome is necessary for flying training operations**
- **Alternatives**
- **Assessment of facilities when FTO seeks CAA approval**
- **Potential problems**
- **Consultation**



### Accident Statistics - Causal Factors



### Accident Statistics - Injuries Sustained





## LOW CATEGORY PROJECT TEAM CONCLUSIONS

- a) **Low Cat Aerodromes – Low Risk**
- b) **CAP XXX implementation contrary to Annex 14 certification**
- c) **ANO change**
- d) **Incorporate with FTO approval**

## Group members/representation and e-mail

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