



Department
for Transport



GA Alliance
Partnership in aviation



General Aviation Strategy



March 2015



Department
for Transport

General Aviation Strategy

March 2015

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1. Forewords

General Aviation (GA) has been a driver of, and an inspiration to, Britain's aviation in the past and has the potential to do so again. For GA to have the future it deserves the Government must make it a priority, and this Strategy sets out how we have done so and what we plan to do next.

When we published our response to the Challenge Panel in October we noted GA's role in training future pilots and engineers, and employing skilled workers. GA still accounts for nine tenths of our aircraft and over half of our pilots, it directly supports almost 10,000 jobs and indirectly nearly 30,000 more. These are skilled careers, including aerospace engineers, those involved in advanced avionics and those training the next generation of pilots. And it is worth three billion pounds annually to the UK economy.

Yet for many years GA has been a Cinderella sector, suffering from a combination of under-recognition and over-regulation. The economic research into the value of GA that we publish alongside this Strategy shows the dramatic impact of this decline and the effect it has had on the sector's economic contribution to the UK. But importantly, it also recognises the need and the scope for renaissance so that the sector can thrive once more.

This research makes suggestions that we have drawn on in our strategic approach to what the Government, local authorities, domestic and international regulators and the

sector itself can do to support this regeneration. We all have important roles to play.

Exactly a year ago the independent aviation regulator, the Civil Aviation Authority (CAA), set up its first-ever General Aviation Unit dedicated to effective regulation that supports and encourages a dynamic GA sector. The unit's first annual report, published alongside this Strategy, shows how far, deep and enduring the CAA's recognition of GA has gone. The CAA can pride itself on many achievements over the past year, not least the launch of a comprehensive review of all sections of the Air Navigation Order affecting General Aviation, part funded by the Department for Transport.

Nonetheless, we are aware that the European Aviation Safety Agency (EASA) still determines much of the scope of regulation which impacts on GA. To this end, we have encouraged EASA to follow our lead in deregulating for GA and reducing burdens. We are supportive of the work which EASA Executive Director, Patrick Ky, is taking forward within the organisation, to improve the way in which GA is regulated at the European level. This is a once in a generation opportunity for EASA to make the regulatory system work better for GA, and we urge them to grasp it with both hands to make sure that they deliver meaningful regulatory improvements. Doing so will benefit those

involved in GA activities across the whole of Europe.

The Government and the CAA will continue to press for better regulation of GA at both the national and international level. But we can't do this alone, and we need the ongoing constructive support of the GA sector to help us deliver results that work best for the community and, just as importantly, to keep our feet to the fire.

Those who take part in flying rightly pride themselves on their independence of mind and spirit. At times this is reflected in the number of voices with which the sector speaks and the range of opinions put forward. In the light of this Strategy we would like to see the sector consider if it can simplify or coordinate the way that it is organised and presents its views, and whether there is any way that the Government can help it to do so.

We are under no illusions about the amount of work that lies ahead and this Strategy sets out how the relevant Government Departments and the CAA are working together to reduce burdens and simplify the regulatory environment in which GA operates. This is a key pillar of the Government's ambition to secure the UK's position as a global GA leader and to unlock the sector's potential for jobs and growth.

Robert Goodwill MP

Parliamentary Under
Secretary of State
for Transport
March 2015



**The Rt Hon
Grant Shapps MP**

Minister without Portfolio
March 2015



The publication of this Strategy provides a clear policy framework for General Aviation (GA) to enhance continued joint-working across Government and with industry.

The Home Office recognises the economic benefits of the GA sector and I am keen that we continue to work with them to ensure that immigration and security checks are conducted on GA flights in an effective and efficient manner. Border Force (BF) provides a range of services to assist the GA sector. This includes a Premium Service for conducting immigration checks and a 24 hour phone line for pilots to submit notification of arrival in an emergency.

However, recent events have underlined the importance of securing the border and having resilient checking processes in place for all modes of transport. The Counter Terrorism and Security Act provides the Government with an important legislative framework to collect advance notification on GA flights into the UK for security and immigration purposes. This is a significant development to enhance the security of the UK. My officials will be working closely with the GA sector to develop and then implement the detail of the requirements in the coming year.

James Brokenshire MP,
Minister for Immigration
and Security



We welcome the publication of this Strategy as another sign of the Government's commitment to the promotion of General Aviation (GA).

In the Civil Aviation Authority (CAA) we are determined to be a better regulator, reducing and improving our regulation of this key part of aviation in the UK. We have been acting fast to remove unnecessary regulation and we believe we have made good progress, at the same time we recognise that there is still a long way to go and we have not always got things right.

The GA Unit is supporting and encouraging a dynamic GA sector. And is already making a key contribution to fulfilling the Government's aspiration for GA to enjoy a safety regulation system that imposes the minimum necessary burden and empowers individuals to make responsible decisions to secure acceptable safety outcomes.

Going forwards a key role for us is to be effective in our influencing of the European Aviation Safety Agency (EASA) in delivering a proportionate regulatory approach to the sector across the EU. In conducting that vital work we value highly the support and effective representations of key members of the GA community. Much of the time we have a common interest and the ability for us to work together so effectively is an almost unique advantage compared to many other countries.

Whilst this report shows that the UK is making good progress this is by no means the end and we recognise that there is much more work to do to ensure that GA flourishes in both the UK and Europe.

Andrew Haines
Chief Executive,
Civil Aviation Authority



GA sector foreword

This is the first time in recent history that there is a specific Government strategy for GA. The GA members of the General and Business Aviation Strategic Forum (GBASF) welcome the Strategy and the declared vision to make the UK the “best place in the world for GA”. In the post-war period the UK was an undisputed leader in all aspects of aviation. GA was more than a part of that; it was a driving force and enabler of a culture of success in our aviation world with the opportunity to get involved as pilots and engineers. This fed the wider aviation interest and led to our being an undisputed leader in sporting and record breaking aviation activities. The strategic intent to regain that position is most welcome and well overdue.

The thrust to arrive at this statement of strategic intent started with the bringing together of GA sector representation and a CAA initiative to conduct strategic and regulatory reviews of GA in 2006. The 2013/14 UK Red Tape Challenge, again involving sector representatives and wide consultation, together with CAA and Government involvement at all levels, has accelerated that to the opportunities we see today. Critically this work has also included how we will ensure a sustainable future for VFR (Visual Flight Rule) users in the Future Airspace Strategy (FAS), as well as the importance of the network of airfields available to GA.

The move to Europe-wide regulation through EASA has been a painful and unproductive experience for many in GA. However, EASA's more recent sign-posting of a proportionate and risk-based approach is very welcome. Vitaly, this UK Strategy includes influencing the regulatory environment in Europe to see parallel change on a significant scale to revive GA's fortunes. We are grateful to all

involved. Without significant work from user groups, individual respondents, a sympathetic regulator and government we simply would not have arrived at this position. However, follow-through, especially from government departments, will be a vital pre-condition for delivery and success of the stated ambitions.

The UK has undoubtedly the best record in Europe when it comes to stakeholder transparency and involvement with Government and our CAA. GBASF brings together a coordinated focus of GA sector representatives with senior Government and CAA board members to advise and ensure progress of the interests of GA and “hold the feet to the fire” in terms of achievement. As part of this Strategy GBASF will formally report on progress at Ministerial level and act as a conduit for the individual sector groups represented within the GA Partnership.

Our expectation is that all involved in influencing the future of GA will engage to achieve the declared vision. That will include the GA sector itself with good engagement and positive response from Government, local authorities and the regulator on deregulation and delegation, sensible policy development and raising the profile of the sector. We need to make this Strategy and that vision happen.

Roger Hopkinson: GAA and Chairman GBASF,

Martin Robinson: CEO AOPA,

Marc Bailey: CEO BBGA



2. Vision

The Government's vision is of the UK being the best place in the world for GA as a flourishing, wealth generating and job producing sector of the economy.

Recent economic research into GA commissioned by the Government gives us an up to date picture of the current economic value of GA. The total economic impact of GA on the UK economy is around £3 billion of Gross Value Added and supports in excess of 38,000 jobs. While GA flying activity, the main determinant of this economic contribution, has fallen significantly in recent years, business aviation and air taxis have experienced growth in movements of around 7% since 2005. The economic value of flight hours has also risen, both in real and nominal terms.

The research paints a picture of a sector that has enormous potential. If the level of flight hours could reach or surpass 2006 levels, while maintaining the current economic value per flight, it would add some £0.7 billion to the UK economy.

While the sector has been in decline it is still possible, and it is the Government's intention, to reverse this trend. There are a number of reasons to be optimistic;

- UK GA has a strong international reputation;
- English is the language of international aviation;

- There are more private flights to and from London than any other European city;
- The UK has the second largest aerospace industry in the world reinforced by our strategic vision for UK aerospace – an ambitious plan to keep our industry at the forefront of the global market.¹

We are optimistic about the prospects for the future success of the sector because of the increased demand which we now expect from the growing economy and this Government's reform programme for GA.

¹ See [Industrial strategy: Government and industry in Partnership Progress Report \(2013\)](#)

3. Aims

In order to achieve this vision the Government will undertake and inspire work across four areas:

- **Thorough deregulation** for GA so that it is policed only to the extent needed to comply with international obligations and to provide appropriate safety and security;
- **Meaningful engagement** with GA by all Government Departments on relevant future policies;
- **Stimulating employment** in GA in terms of how many people are involved and how much they participate;

- **Supporting infrastructure that is appropriate in its extent, capability and location** to deliver a mixed, modern fleet of aircraft flying between appropriately equipped aerodromes across well-defined airspace.

We are working across Government, engaging and collaborating with relevant bodies in the other UK Governments, and more widely in order to achieve these aims for the whole of the UK.

4. Government commitments for GA

In this Strategy we have made a number of commitments to the GA sector. These are discussed in greater detail throughout the following sections of this document, and are listed below.

1. We commit to engaging more effectively with GA when developing, reviewing and modifying policies;
2. We will support GA sector initiatives to engage more people in GA and to celebrate its achievements;
3. We will promote apprenticeships in England and other GA training initiatives;
4. We will consider whether to continue meetings of the GA Ministerial Star Chamber;
5. We will offer financial support to the GA Air Navigation Order Review
6. We will legislate on the outcomes of the Review in 2016 and on other deregulatory matters from the GA Red Tape Challenge process after appropriate consultation;
7. We will introduce proportionate and flexible civil sanctions for Air Navigation Order offences;
8. We are committed to working with the European Commission and EASA to ensure the timely implementation of the GA Road Map;
9. We will seek to resolve the issue of access to Belgian airspace;
10. We will amend planning guidance on the National Planning Policy Framework for England so that it makes appropriate reference to GA aerodromes as part of a network;
11. We will circulate more detailed GA sector guidance from the General Aviation Awareness Council to planning authorities in England on GA matters;
12. We will encourage more proactive engagement between local aerodromes, local communities, Local Planning Authorities and LEPs;
13. We will improve guidance to GA on the use of military aerodromes;
14. We will look to introduce simpler, standard pre-notification periods for GA, simplify the GAR completion process, through an electronic submission option, and introducing a GAR emergency telephone line for notifying changes to GAR information;
15. We will consult on the proposals for requiring advance notification after Royal Assent for the Counter Terrorism and Security Act, and will aim for as much harmonisation as possible between the various advance notification requirements;

16. We will work with the GA sector to encourage the sector to develop standards in all occupations that they would like to see covered by apprenticeships in England in future;
17. Following a recommendation made by the GA Red Tape Challenge Panel we are reducing the CAA's rate of return from 6% to 3.5%;
18. We will ensure that in exercising its non-economic regulatory functions, the CAA has regard for the growth of GA and the rest of the aviation sector;
19. We will appoint a Small Business Appeals Champion to provide assurance to business GA and other commercial aviation sectors that the CAA's appeals and complaints processes provide clear and effective routes;
20. We will continue to engage actively with the GA community including on metrics for success, through the reports and work of the General and Business Aviation Strategic Forum.

5. Context

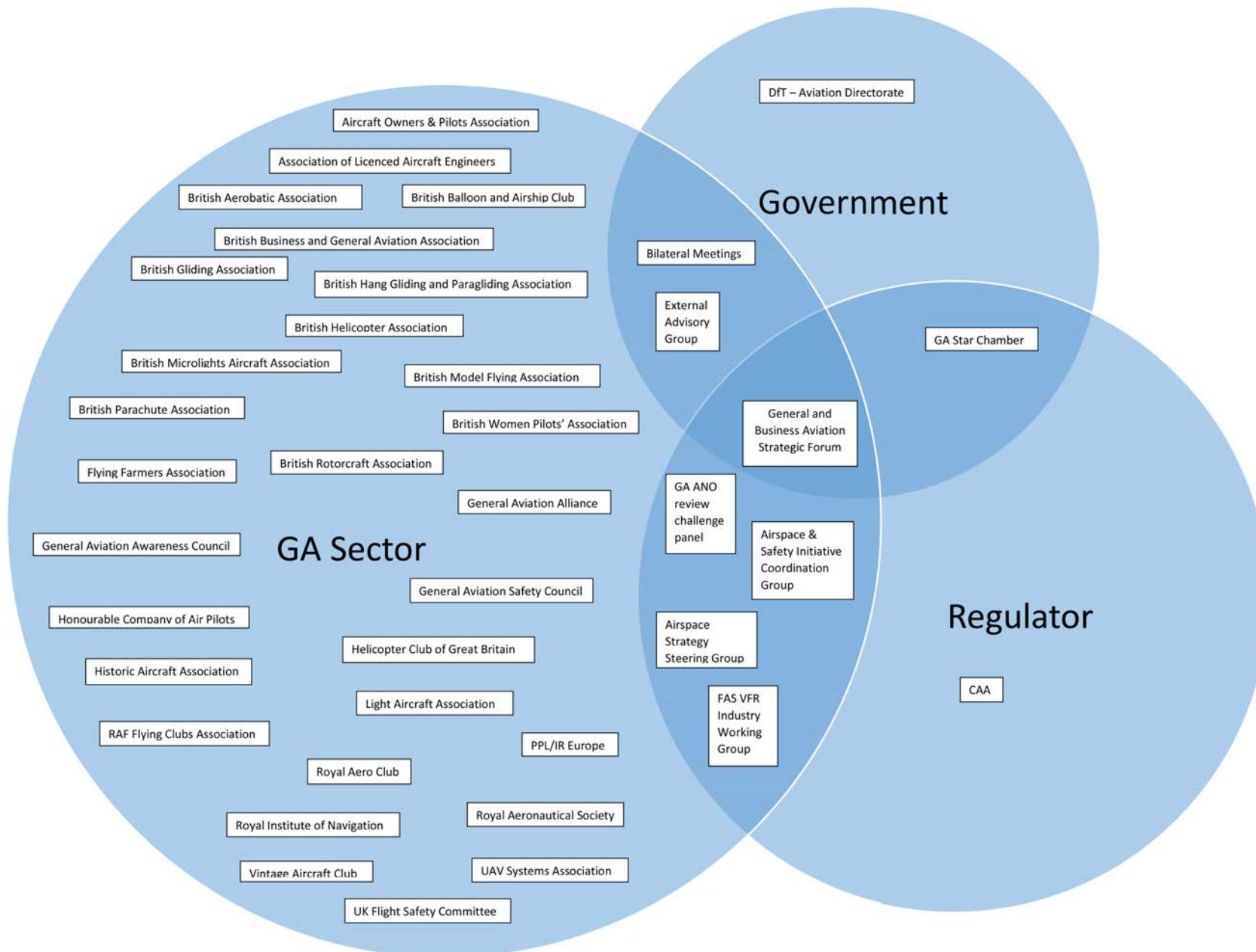
This Government recognised the importance of GA in its 2013 Aviation Policy Framework (APF) and has since striven to remove regulatory barriers to GA so as to boost the economic and employment potential that the sector is capable of making. The Aviation Red Tape Challenge (RTC) provided the deregulatory impetus the sector needed and the subsequent specific GA RTC drew more e-mail responses than any other RTC theme to date, and culminated in the establishment of an independent Challenge Panel of representatives from across the sector to suggest areas in which the regulation on GA could be improved. The Government's response to the recommendations from this process has led to action being taken by the CAA and across Government to develop a programme of work aimed at improving the conditions within which GA operates within the UK and on which this Strategy reports.

The establishment of the CAA's GA Unit is one of the most notable outcomes from the GA RTC. The Unit has so far undertaken sterling work to put into practice ideas which could improve the way in which GA is regulated, helping to reduce the burdens placed on both individuals and business.

The Government's work has included commissioning research into the economic value of the UK GA sector, to provide up-to-date evidence about its current state. This was especially important, since it is widely acknowledged that one of the longstanding barriers to reform in the GA sector is the lack of available data. The new research is published alongside this Strategy and has informed the Government's thinking in developing it, and slides summarising the key findings from this study are annexed to this Strategy.

Finally the EASA GA Road Map has set out the direction for increased action to tackle regulatory burdens placed on the GA sector at the European level. The Government and the CAA have pressed EASA to prioritise a deregulatory programme of work for GA and we will continue to work closely with it to reach agreement about the regulatory changes which it will make in order to support the GA sector and the timetables for delivering these.

Figure 1: Engagement between the GA Sector, the CAA and Government



6. What the economic research into GA tells us about our vision and aims

The Government's vision is of the UK being the best country in the world for GA as a flourishing, wealth generating and job producing sector of the UK economy.

The total economic footprint of UK based GA activity in 2013 has been estimated at about £3 billion, supporting over 38,000 jobs, 9,700 directly related to flying and the remainder to manufacturing. In Gross Value Added terms, this total includes:

- an economic footprint from GA flying operations of £1.1 billion;
- the export component of GA manufacturing of around £1.1 billion;
- the additional wider benefits deriving from the use of business aviation of at least £0.8 billion.

There are also additional benefits to associated industries such as tourism (see the Gliding case study below). If GA flying could be reinvigorated to levels similar to those of 2005 then the economic value of the sector could increase to some £1.8 billion.

The findings of the economic research into GA confirm that the Government has taken the right approach with policies aimed at supporting a vibrant GA sector with a programme of rigorous deregulation. We will continue to support the sector by achieving our four aims:

Thorough deregulation for GA

The research strongly indicates that GA users consider their sector to be over-regulated and the magnitude and detail of the responses to the GA Red Tape Challenge confirmed that there is a ready appetite for deregulation across GA, despite the greater sector responsibility that this could involve. Where deregulation is not possible then the CAA will consider the scope for removing as much of GA as possible from their regulatory oversight through delegation to sector-led organisations.

The CAA has already embarked on this process and full details of how it has responded to the Red Tape Challenge are contained in its GA Annual Report which it is publishing at the same time as this Strategy. Deregulation already achieved includes:

- deregulating all small single seat microlights less than 300 kg;
- allowing pilot controlled runway lighting at licensed aerodromes;
- successfully negotiating with EASA a 5 year extension of the UK Instrument Meteorological Conditions (IMC) rating;
- permitting the use of 8.33 KHz hand-held radios in Permit to Fly aircraft;

- delegating some gyroplane regulation to other organisations and also removing the over flight restrictions on type approved gyroplanes;
- developing the GA policy framework to deliver a better, transparent and more proportionate approach to the regulation of GA; for example, this framework allowed the first paid passenger flight in a Spitfire aircraft without the need for the operator to hold an Air Operator Certificate (AOC);
- allowing US/Canadian approved modifications to be installed in a non-EASA aircraft in the UK without separate UK approval;
- developing the framework to delegate airworthiness oversight to the GA community (the CAA is currently working with aircraft associations to allow this delegation to take place).

European regulation is often the basis for the CAA's regulatory regime. Further deregulation and delegation will need work by the UK Government and the CAA in transposing European regulation and for EASA to ensure that new Europe-wide regulation is simpler, lighter and better as EASA itself aspires to be in relation to GA.

Meaningful engagement with GA by all of Government

The economic research into GA confirms that the Government can better consult the GA sector. We agree that improved engagement with central and Local Government could be important factors in reviving the sector. Government Departments must better understand and recognise the economic importance of the sector and improve the

account that they take of it. They are committed to doing so.

The research also suggested that the large number of representative organisations in the GA sector can make its effective representation and ability to influence particularly challenging. We have set out at the start of this section (*Figure 3 – Engagement between the GA Sector, the CAA and Government*), our mapping of the organisations that we are aware of and how they interact with central Government and with the regulator and will return to this in the section on Governance.

Stimulating employment in GA

GA serves business functions, forms an essential part of the emergency services and is for many people a fulfilling leisure and sporting activity. However there has been a significant decline in the UK GA sector's activity overall in recent years, and particularly in relation to leisure flying. This amounts to a reduction of about 45% since 2005 at reporting airports. There has also been a marked decline in hours flown particularly for fixed wing aircraft. The economic research into GA suggests that the population of pilots and other GA users is getting older and has explored the reasons for this such as the attraction of rival options like drones and advanced computer flight simulators, and in addition an ageing fleet may be less attractive to younger fliers some of whom may go directly into professional flying. Where costs increase due to, for example, historic fuel cost rises, this can also discourage participation, some factors like fuel costs tend to be cyclic.

Innovative aircraft could help to improve this situation. The CAA's work to develop an experimental category of aircraft classification

to reduce the regulatory burden on innovation will support this. The GA sector should also consider how to find new ways of engaging with potential new recruits and particularly with younger flyers. This could include apprenticeships, competitions, engagement with education institutions and positive media representations. The Government stands ready to support such initiatives.

There is work the Government can do to improve the situation by promoting apprenticeships and other training opportunities and by celebrating the achievements and value of GA. There is also a role for the sector in encouraging those in it to champion it and to boost recruitment.

A good example of a successful company in GA where there is further potential for growth from additional deregulation is Cameron Ballooning, which is described below.

International comparisons

The economic research into GA is also a good basis for comparing the UK situation with that elsewhere in Europe and also with the USA. GA aircraft numbers in Europe between 2002 and 2008 were trending upwards until the start of the recession, and generally downwards thereafter. In the Netherlands and UK the fall began in 2009, in France and Germany in 2011, while Switzerland experienced a fall in all but two years of this period. By contrast the USA shows a more mixed pattern, with falls in 2003 and all years after 2008. Another interesting contrast is the ratio of GA aircraft to airports. In the European states named above it is between 40 and 77 (44 for the UK) while in the US it is 17. Not only does the US have vastly more aircraft and airports, it has vastly more airports in proportion to its GA fliers in terms of 2010-14 airport

estimates and 2010 GA aircraft figures. Of course this is not necessarily reflected in connectivity, as a GA aircraft in one of these locations will not be able to fly directly to each of the others ².



We have made direct comparisons between the UK and US GA sectors in three areas;

- Value of GA – both in absolute terms and as a share of the overall economy;

² General Aviation Manufacturers Association (2014) 2014 General Aviation Statistical Databook and 2015 Industry Outlook

Case Study – Cameron Ballooning

- *Cameron Balloons is a good example of a British GA company conquering the export market, becoming the best-selling brand of hot air balloons in the world. By harnessing Britain's GA heritage and world leading expertise Cameron Ballooning has provided a template for GA manufactures across the country, occupying a 42,000 square foot factory in the centre of Bristol and employing 55 people. Over the past 40 years they have manufactured more than 8,000 hot air balloons. At present over 5,000 of their burners are in operation and over 2,000 designs of baskets are available. In addition, they have produced nearly 1,000 specially shaped hot air balloons for use all over the globe.*
- *As successful as Cameron Balloons has been the ballooning industry provides an example of how further de-regulation could have immediate benefits to the UK economy. The company estimate the basic cost of running a hot air balloon for a sporting pilot making 12 flights per year to be £150/hour; and the cost of satisfying the regulators for the same pilot to be around £289/hour. Because the unit cost of balloons is so much lower than other aircraft, the cost of the bureaucracy has a disproportionate effect. As the cost of satisfying regulation has crept up the sector has suffered a gradual but noticeable decline. Between 2010 and 2013 the number of balloons sold by Cameron has fallen from 130 to 82. This example serves to highlight the magnitude of the gains available from continuing regulatory reform in the UK and more proportionate rulemaking by European and international regulators.*

Source: Cameron Ballooning

The direct economic impact of the GA sector in 2014 in the UK was £3bn or 0.21% of UK GVA³. This compares to the US GA sector whose direct contribution is £49bn or 0.26%⁴ of the US economy.

- Jobs – absolute and as a percentage of overall workforce;

In the UK the GA sector directly supports 38,000 jobs equivalent to 0.12% of all UK employment. In the US the figure is 255,000

jobs or 0.18% of employment⁵, which is fairly comparable and indicative of the well-developed state of the UK GA sector and the industries it supports.

- Value per job – to see how “high yielding” the jobs in the US GA sector are in comparison to the UK;

However the US GA sector appears to be more productive as it yields more value per job than its UK counterpart. GA yields around £192,000 of value for each job in the US compared to £79,000⁶ in the UK.

3 York Aviation (2015), Economic Impact of General Aviation in the UK.

4 \$75bn converted to GBP. PwC (2015), Contribution of General Aviation to the US Economy in 2013.

5 The UK figure is in Full Time Equivalent terms and the US figure includes part-time jobs, hence is an overestimate. The comparative figures exclude jobs supported in the wider economy.

6 The figures consider direct value added and direct employment only.

Supporting infrastructure that is appropriate in its extent, capability and location

Over the same period that the size of the GA fleet has declined, the number of aerodromes has also fallen. The economic research into GA has suggested that guidance could

encourage planners to support the maintenance of the level of availability and connectivity necessary for GA to be viable - what has been referred to as a strategic network.

The case study below highlights the achievements of one thriving part of the GA sector:

Case Study – Gliding

- *Gliding is a significant part of the GA community. The British Gliding Association (BGA) told us that there are 84 clubs in the UK with some 9,000 members, of which 7,000 are regular participants and around 6,000 are active pilots. Gliding is the “affordable way of flying” being significantly cheaper than powered flight.*
- *Cross country gliding is a very popular element of the sport and usually involves a ‘triangular’ course passing defined waypoints and returning to home base, but sometimes requires landing at an alternative aerodrome or in a field if the conditions are unfavourable. In the hands of an experienced pilot, and with the right conditions, a glider can cover as much as 300 kilometres in a single trip.*
- *BGA regards gliding as a sport activity rather than a transport mode, and its primary social benefit is as a recreational activity, providing physical and mental health benefits to participants. Although its direct and indirect benefits are captured in our economic assessment as a sub-sector of GA, its wider benefits form a component of the larger and significant economic benefits that derive from sports activity in the UK.*
- *Wider benefits are also derived from tourism impacts. An example of these benefits would be The Scottish Gliding Centre. The Scottish Gliding Centre operates with a combined turnover of around £0.4M. The club is typical in that it is open to all and, weather permitting, provides a national, regional and community asset that is open all year round and encourages visitors to the area.*
- *A conservative estimate of visitor spending in the region is £100 per bed night and, during one year, the Scottish Gliding Centre recorded 407 person-weeks booked (167 glider-weeks) equivalent to 2,849 bed nights. This equates to £0.29M of income to the local tourist economy. These visitors support local bed and breakfast establishments, hotels, restaurants and other leisure facilities, as well as playing a significant part in the finances of the club.*
- *The SGU represents 64% of gliding membership in Scotland. However, its reliance on visitors is much less than other clubs in Scotland. Making the assumption that a gliding club’s financial turnover is directly proportional to the size of its membership, and allowing for their increased percentage reliance on visitors, the value of visitors to the Scottish tourist industry as a whole is conservatively estimated at £0.45M per annum.*

Source: British Gliding Association.



Government commitments in this section

1. We commit to engaging more effectively with GA when developing, reviewing and modifying policies;
2. We will support GA sector initiatives to engage more people in GA and to celebrate its achievements;
3. We will promote apprenticeships in England and other GA training initiatives.

The following sections show how we are working across Government to pursue the goals of this Strategy for the GA sector.

7. DfT and CAA activities

Background

Both the DfT and the CAA have been actively seeking to reform and provide support in pursuit of the Government's vision of stimulating a thriving UK GA sector. We have already made significant progress in some areas and further action is planned in others.

1. Domestic

GA ministerial Star Chamber

To ensure the momentum of reform which arose during the GA Red Tape Challenge was maintained, in the Government's response to the GA Challenge Panel's final report it was agreed that a Ministerial Star Chamber would be established. This was chaired by the Minister without Portfolio, the Rt Hon Grant Shapps MP and included Ministerial level membership from across Departments whose policies impact upon the GA sector, together with the CAA. These were the Department for Communities and Local Government, The Ministry of Defence, the Home Office, Her Majesty's Revenue and Customs and the Department for Business, Innovation and Skills.

It was agreed that the Star Chamber should convene three times before the end of the current Parliament, primarily in order to oversee the work of York Aviation in producing its economic research into the GA Sector and to draw together and provide

agreement for the elements of this GA Strategy.

The Star Chamber has proved a useful forum for discussing the issues affecting GA across a number of Departments and Ministerial attendance at these meetings has demonstrated the importance of the programme of GA work to the Government.

Although there are no current plans for the Star Chamber to meet again, the Government remains open to this and will consider convening future meetings of the Star Chamber if the need arises in the next Parliament.

CAA GA reform programme

The CAA has formed a dedicated GA Unit and now has an expansive GA reform process in progress. Full details of this can be found in the Annual Report of the CAA's GA Unit which is published alongside this Strategy.

The GA Programme was established to deliver projects in line with the CAA response to the Government's Red Tape Challenge:

- Only regulate directly when necessary and to do so proportionately;
- Deregulate where possible;
- Delegate where appropriate;
- To not 'gold-plate' EU legislation.

This programme of work saw the introduction of the GA Policy Framework – a framework to deliver a better, transparent and more proportionate approach to the regulation of General Aviation. Using this new deregulatory approach has enabled a wide range of improvements, including the first paid passenger flight in a Spitfire aircraft, without the operator requiring an Air Operator's Certificate (AOC). Other examples include the complete deregulation of all small single seat microlights (less than 300kg), allowing pilot controlled runway lighting at licensed aerodromes and allowing US/Canadian approved modifications to be installed in a non-EASA aircraft in the UK without separate UK approval.

Examples of work planned for the future include reducing the medical standards required for the National Private Pilot's Licence, releasing a new Private Pilot training syllabus which will be more relevant for today's environment, in addition to introducing on-line theoretical knowledge examinations. The CAA has developed the certification basis which will enable the first ICAO Certificate of Airworthiness for modern Gyroplanes in Europe to be issued. In the future, a Gyroplane Commercial Pilot's Licence will also be developed and together,

this will enable gyroplanes to be used commercially in the UK (for example Border Control, Power line or Rail inspection and commuting). More detail on the work completed and the future programme plan can be found in the Annex to this Strategy and in the CAA GA Unit's Annual Report published alongside it.

GA Air Navigation Order (ANO) review

The CAA, with DfT oversight and financial support, is currently undergoing a detailed review of the Air Navigation Order (ANO) Articles which relate to GA. A challenge panel from the GA sector itself has examined each proposal for change or for no change to ensure that the CAA demonstrates an appropriate appetite for deregulation through this project. The Government also carried out its own challenge panel process. The CAA has this week launched a formal consultation on the themes of the review. A further detailed consultation on specific proposals for change will follow. The Government and the CAA intend that changes to the ANO will come into effect by the end of 2016.



Scope of the review

In defining the scope of the review, the CAA did not include any provisions that did not apply to GA activities or any activities that the CAA would not be able to alter, for example because they applied across Europe. The latter would be taken forward in the Government's and the CAA's work on deregulation at the European level. This resulted in the inclusion of about 65% of the ANO articles, with all of the relevant schedules also being reviewed.

The small number of exclusions covered:

- Articles relating only to areas of regulation that are covered by EASA implementing rules, for example the operation of EASA aircraft;



- Articles that relate solely to commercial air transport operations;
- Articles that relate to the approval or provision of air traffic services; and
- The Rules of the Air, since this separate piece of legislation, was reviewed in light of the adoption of the Standardised European Rules of the Air (SERA).

Objectives of the review

The review was conducted in accordance with the broad principles that the CAA has set out for the regulation of GA in the response to the GA Red Tape Challenge <http://www.caa.co.uk/docs/33/CAP1123%20CAA%20response%20to%20GA%20Red%20Tape%20Challenge.pdf> and further expanded by the GA Policy Framework <http://www.caa.co.uk/default.aspx?catid=224&pageid=16582>

Particular emphasis was given to only regulate directly when necessary, and then to do so in accordance with better regulation principles.

The key objectives of the review included:

- Ensuring that the ANO is compatible with the CAA's new approach to the regulation of the sector and establish the legal basis for the GA programme;
- When examining each article, review the CAA's general approach to the issue, with a view to developing a future approach that would be of benefit to the UK's GA sector, and determine how a future ANO will enable that;
- Where possible, consider how the ANO could be made shorter, simpler and easier to understand;

- As a result of the review process, produce a package of reform measures for consultation, which could then be reflected in amendments to the ANO.

The outcome of the review will depend on the results of the further work of the CAA and on the responses to the thematic and the detailed consultations which we commend to the GA sector to involve itself in as fully as possible. However the Government expects there to be significant benefits to GA arising from this review. The work that has gone into the review to date suggests that of the 182 Articles which are relevant to GA, some 36% will be significantly improved or simplified and 7% will be wholly removed.

As a result the ANO will be shorter, clearer and place less of a burden on GA and the changes introduced will have been arrived at consensually and transparently with the GA sector itself. The extent of the changes and the savings that will accrue to GA will be fully set out in the Impact Assessment that will be prepared for the detailed consultation to come.

It is not appropriate in this document to set out the 80 or so areas where changes are proposed for the Air Navigation Order. However they include:

- Extending who can register an aircraft on the UK register to allow foreign owned aircraft to undertake activities such as training;
- Scrapping certificate of maintenance requirements for non-EASA aircraft;
- Scrapping the different flight crew licensing requirements for non-EASA balloons;
- Improving various aircraft and radio communication equipment exemptions;
- Scrapping some provisions relating to gliders and their towing;
- Introducing a 'Skyway Code' a simple guide to assist understanding of day to day flying activities;
- Reviewing CAA involvement in parachute operations and flying displays;
- Allowing a greater range of non-ICAO compliant aircraft to do remunerated; operations via a new Special Category certificate of airworthiness;
- Deregulating the licensing of small single occupant aircraft;
- Removing the crew requirement to wear survival suits;
- Reviewing the need for certain medical certificates/declarations;
- Inviting comments on the regulation of voluntary organisations' ability to support the police in search activities.

Civil sanctions

The DfT and CAA are also developing proposals for an alternative to expensive and time consuming court action where those who fly fail to meet expected regulatory requirements. At present the CAA can utilise criminal sanctions as part of its licencing function to ensure compliance. This means in practice that when an offence is committed the CAA can bring criminal charges against an individual, which is prohibitively expensive and may be disproportionate, remove licences, which can be disproportionate, or send a warning letter to the individual concerned, which has no legal effect in securing compliance.

The proposed changes will give the CAA the power to use civil sanctions such as variable



monetary penalties, stop notices, restoration notices and enforcement undertakings. These new penalties can be applied much quicker and in a manner proportionate to the seriousness of the offence. This reform will give the CAA the powers they need to create a more proportionate and cost effective enforcement regime.

At the same time that we remove from the Air Navigation Order those parts of regulation that should not apply to GA, the Government will give the CAA the tools it needs for timely and flexible enforcement of the provisions that remain, and should remain. This will only have an impact on the tiny proportion of GA (and other) users who breach the rules, so as to bring them back into compliance as speedily and effectively as possible. We intend to consult on this later in the year.

2. European issues

European Aviation Safety Agency (EASA) GA Road Map

General Aviation is a high priority for the European Aviation Safety Agency (EASA) given the important contribution the sector makes to achieving a safe European aviation system. In partnership with the European Commission and other stakeholders EASA has created a Road Map for Regulation of General Aviation (the 'GA Road Map'). Through this EASA is dedicating effort and resources towards creating simpler, lighter and better rules for General Aviation. The GA Road Map also recognises that regulation is not always the best way of improving safety and that other tools such as safety promotion material can be equally effective.

Work on the GA Road Map is already starting to take effect. For example, the implementation date for the use of Approved Training Organisations for training for private pilots' licences has been deferred by 3 years. This will allow time to ensure that the regulatory regime for such organisations is made proportionate to the activities being undertaken. In addition amendments have been introduced to make the requirements for the maintenance of general aviation aircraft more appropriate. We are committed to working with the European Commission and EASA to ensure the timely implementation of the GA Road Map.

Amendment to the EASA Basic Regulation

The European Commission will be proposing amendments to the EASA Basic Regulation later this year. We will be seeking to ensure that the revised Regulation supports and

enables the introduction of proportionate regulation for General Aviation.

Access to Belgian airspace for UK permit to fly aircraft

The Light Aircraft Association has brought to our attention issues related to National Permit to Fly (PtF) aircraft flying into or across EU Territories. Whilst an ECAC (European Aviation Conference) resolution recommends that amateur build aircraft with a national non ICAO Permit to Fly be allowed to overfly and land in European states that is not fully implemented and there is no such agreement for ex-factory (orphan) PtF aircraft. CAA has already worked with France, Ireland and the Channel Islands developing a mutual recognition agreement to resolve this issue. However, the free movement into Belgium is a particular case where individual application is required for both classes of aircraft with a significant fee resulting in many aircraft taking long sea crossings to avoid Belgian airspace at higher operational risk. CAA and DfT will work to address specifically the Belgium issue and also support the European Federation of Light, Experimental and Vintage Aircraft (EFLEVA) in its endeavours to generally extend or replace the existing ECAC resolution to include ex-factory (orphan) PtF aircraft and progress the EU principles of free movement.

Fitness policy

The CAA is working together with EASA to develop a Fitness policy, using lessons learned from other professions and other countries. The current legal framework focuses primarily on competence which is the ability of an individual to meet certain standards. However, a competent individual may generate risks through their behaviour and safe aviation requires that a competent



individual must be fit and proper to carry out the responsibilities of their role. Hence, 'Fitness' is the suitability of an individual to perform their role. Greater clarity of responsibilities around fitness is intended to support further deregulation.

3. Airspace

The Future Airspace Strategy Visual Flight Rules (VFR) Implementation Group (FASVIG) was setup to develop a FAS VFR Deployment Plan to deliver tangible benefits for GA VFR users from 2015 to 2020 and to establish a sustainable future for VFR operations.

FASVIG launched its FAS VFR Implementation Programme on 28 March, a first step to the Deployment Plan, which sets out 'Packages of Change' that will ensure that the GA sector realises the following benefits:

- The importance of VFR operations is understood and recognised in airspace policy and decision making. Controlled and regulated airspace is rebalanced to reflect the needs of both VFR and Instrument Flight Rules (IFR) operations;
- Flexible management of airspace structures is widely implemented and based on greater engagement with VFR operators;
- The capacity of airspace structures to accommodate VFR operations is measured and maximised;
- VFR aircraft are not excluded from any airspace that is not being fully utilised for its intended purpose and airspace sharing is enabled in near real-time;
- The information and procedures needed to operate safely and efficiently in complex airspace structures is readily available and accessible;
- Airspace activities and restrictions are available and timely.

In addition, as part of the CAA's GA Programme, the Electronic Conspicuity project will, in 2016, provide a low cost, lightweight device that enables GA pilots to detect each other and take the appropriate action in accordance with the Rules of the Air.

There is also work underway to ensure that more proportionate instrument approaches are widely available for the GA sector.

Government commitments in this section

4. We will consider whether to continue meetings of the GA Ministerial Star Chamber;

5. We will offer financial support to the GA Air Navigation Order review;
6. We will legislate on the outcomes of the Review in 2016 and on other deregulatory matters from the GA Red Tape Challenge process after appropriate consultation;
7. We will introduce proportionate and flexible civil sanctions for Air Navigation Order offences;
8. We are committed to working with the European Commission and EASA to ensure the timely implementation of the GA Road Map;
9. We will seek to resolve the issue of access to Belgian airspace.

8. Departmental policy issues

1. Department for Communities and Local Government (DCLG)

The importance the National Planning Policy Framework provides for aerodromes is welcomed. The Framework makes clear that when planning for airports and airfields that are not subject to a separate national policy statement, plans should take account of their growth and role in serving business, leisure, training and emergency needs. The Framework also makes clear that plans should take account of the Framework as well as the principles set out in the relevant national policy statements and the Government Framework for UK Aviation.

However a key issue which emerged from the economic research into GA was the perception that low priority was being given to the strategic importance of GA aerodromes in the course of planning decisions and the potential for greater consideration to be given to these within planning policy in the future. There are three main problems;

Planning for new airfields

A new GA accessible airfield has not opened in the UK for many years, partly due to market conditions but also because of the difficulty of finding suitable sites. This has been at a time that a number of airfields have closed. The table below illustrates the reduction in the number of licensed aerodromes in the UK since 2008.

Opposition to new airfields is often high within local communities, especially where the potential benefits of a GA airfield to the area may be poorly understood, while the potential adverse effects are publicised and more readily appreciated. The recent GA economic research into GA recommends that the Government should continue to encourage planning authorities to ensure that they take the economic and employment role local airfields play into account in their Local Plans and in all planning decisions.

Table 1: Number of CAA Licensed Aerodromes 2008 to 2014

Year	2008	2009	2010	2011	2012	2013	2014
Number	144	144	138	134	129	128	124

Source: CAA

Upgrading new airfields

Existing GA airfields also find it difficult to gain planning consent to develop their existing facilities. Aviation is a sector where technology changes very quickly and in order to survive businesses must adapt to reflect this progress, such as by improving hanger facilities or creating all-weather runways. Improvements to infrastructure at airfields are increasingly vital to their ability to survive. Often airfields are situated on Green Belt land, which enjoys the highest protection in planning terms and where development is restricted.

Further steps the Government has taken

However we note that since this case, the Government has reformed the planning system to make it more positive in outlook and simpler to operate. For example, 78% of major applications were determined on time in July to September 2014, compared with 57% in July to September 2012, the quarter in which the Government announced its intention to designate poorly performing local authorities.

Prioritisation of other land uses

Though some local authorities are extremely supportive of GA airfields this is not always the case. York Aviation found through surveying airfields that many felt they did not have the full support of local authorities and Local Enterprise Partnerships (LEPs). While most of these bodies would acknowledge the clear value of GA infrastructure this appeared to be often overshadowed by the need for other land use priorities, in particular housing.

Airfields may often be located on substantial areas of land that may not be particularly profitable to operate and the owners may well see them as good development

opportunities for the construction of new houses. Of course it is for the owner of land to decide what to do with their property, within the law.

This is a particular problem for the GA sector, as airfields are more than likely to be classified as brownfield sites. The case study below, illustrates common concerns which many GA airfields have about being the potential target of development proposals by the owners of such sites for new housing.

In order to provide greater support for local GA airfields, the Government is issuing guidance about aerodromes to planning authorities with reference to the National Planning Policy Framework, so that the network of these sites is considered within Local Plans and taken into account in future planning decisions⁷. The GA sector has itself produced more detailed guidance for planning authorities and aerodrome owners and operators. This is being published by the General Aviation Awareness Council.

The Department for Transport will bring this guidance, as well as the research on the economic value of GA, to the attention of planning authorities and Local Enterprise Partnerships (LEPS) in England, so that they are aware of the issues being faced at many GA airfields.

The case of Sywell aerodrome below, illustrates what is achievable for airfields situated in the Green Belt who need to develop their facilities and how an authority can take a robust approach to alternative uses;

⁷ The guidance is in the Planning Practice Guidance Paragraph: 012 Reference ID: 54-012-20150313 at <http://planningguidance.planningportal.gov.uk/blog/guidance/transport-evidence-bases-in-plan-making/transport-evidence-bases-in-plan-making-guidance/>

Case Study – Sywell Aerodrome

Sywell is a licensed general and business aviation aerodrome located around 6 miles north east of Northampton and close to the M1 motorway. The Airport is operated by Sywell Aerodrome Ltd. and offers hangarage and maintenance for users. There are flying schools catering for fixed-wing, microlights and helicopters and there is an on-site hotel, conference facilities, and a museum.

Like many other aerodromes with grass runways, Sywell had been experiencing problems with waterlogging in the winter period and originally applied to its local planning authority for planning permission to construct an all-weather (i.e. hard surfaced) runway in February 1999, supported by an Environmental Statement (ES). However, after a period of around two years had elapsed without the application being determined, the aerodrome appealed the application on the grounds of non-determination.

However, in November 2001 the aerodrome submitted a second application and in March 2002 the local planning authority voted to approve this, subject to a number of conditions restricting aircraft movements and with a Section 106 agreement. As a result of this the appeal relating to the first application was withdrawn. However, a local opposition group mounted a legal challenge to the approval of the second application by way of judicial review in September 2002. A hearing was held in the High Court and it was determined that there had been some procedural errors in the local planning authority's decision making process and the appeal was upheld.

In June 2003 Sywell Aerodrome began work on a third planning application, which was submitted in June 2004, along with a revised ES. This was also appealed by the aerodrome on the grounds of non-determination in March 2005 and a Public Inquiry was set up in July 2006, which ran for two weeks. The Inspector allowed the appeal, subject to certain conditions, and his report was dated November 2006. But it was another year before planning permission was finally granted in November 2007. Work commenced in 2008 and the new all-weather runway was finally opened in February 2010.

In all, it took almost nine years from the first planning application in February 1999 to planning permission being granted in November 2007.



Local Enterprise Partnerships (LEPs)

During discussions of the GA Star Chamber DCLG suggested that greater engagement with the Local Enterprise Partnerships (LEPs) which operate in England would be an effective way of supporting GA airfields to achieve better outcomes from local planning decisions, as part of their strategy for economic development.

Localism has been at the heart of this Government's planning agenda. Therefore engagement with the LEPs has been key to the Government's efforts to date to secure greater recognition for GA infrastructure in planning decisions.

The Minister for Universities, Science and Cities, Greg Clark, held a conference call with the LEPs to advise them of the economic

research into GA. This has been followed up with meetings and correspondence in relation to specific LEPs responsible for areas where key GA aerodromes are based.

As we move forward, the Government will also encourage better and more proactive engagement between GA aerodromes and their local communities, local planners and stakeholders, including LEPs (in England) to promote the value of the activities which are undertaken at these sites.

A good example of positive engagement between a GA airfield and its local partners is below.

Case Study – City Airport & Heliport Manchester

City Airport & Heliport, formerly known as Barton Aerodrome, is a licensed GA aerodrome located around 6 miles west of the city of Manchester and around 10 miles north of the much larger Manchester Airport. It currently has grass runways and handled around 28,000 aircraft movements in 2013, with over 60 based aircraft. The Heliport is a dedicated premium helicopter facility and business centre established in 2012 and used by private helicopters but also by Sky and the BBC, the Police and Air Ambulance, Network Rail, and pipeline inspections. The Aerodrome is owned by Manchester Ship Canal Developments (a joint venture between Peel and Manchester City Council), who acquired it in 2002, since when more than £0.25 million has been invested in new facilities.

There are good relations with the Local Planning Authority (Salford) whose Core Strategy states (at para. 14.58) “The aerodrome has a valuable general aviation role, serving business, recreational, training and emergency service needs, not just for Salford but also for the wider sub-region. This helps to reduce pressures on the nearby Manchester Airport. It will be important to ensure that Barton Aerodrome continues to function effectively as a GA facility for Greater Manchester, balancing the potential to increase its contribution to local economic growth with the desirability of protecting and enhancing its distinctive heritage interest.

Community relations are very strong and there is an effective Consultative Committee in place. The Aerodrome hosts a ‘Family Fun Day’ with aircraft flying in from other aerodromes, which attracts visitors in the thousands. The Aerodrome also offers one week work experience placements to school, college and university students living within a 30 mile radius of the Aerodrome, to spend time in the Air Traffic Services and Operations Department. Places are in high demand.



2. Ministry of Defence (MoD)

GA access to military airfields

MoD policy is to encourage the civilian sector, including GA, to have access to military airfields wherever possible. These facilities are already used by the GA sector, but following discussions at the Ministerial Star Chamber, the Government has agreed to review the guidance which is available to the GA sector about access to MoD airfields. It has been accepted that the publicity currently available needs to be improved, for example to notify GA about the protocols which they should follow in order to make use of military sites.

Heads of Establishment at military airfields would still need to consider all requests for access to these airfields, to ensure that GA access is effectively integrated with military activity.

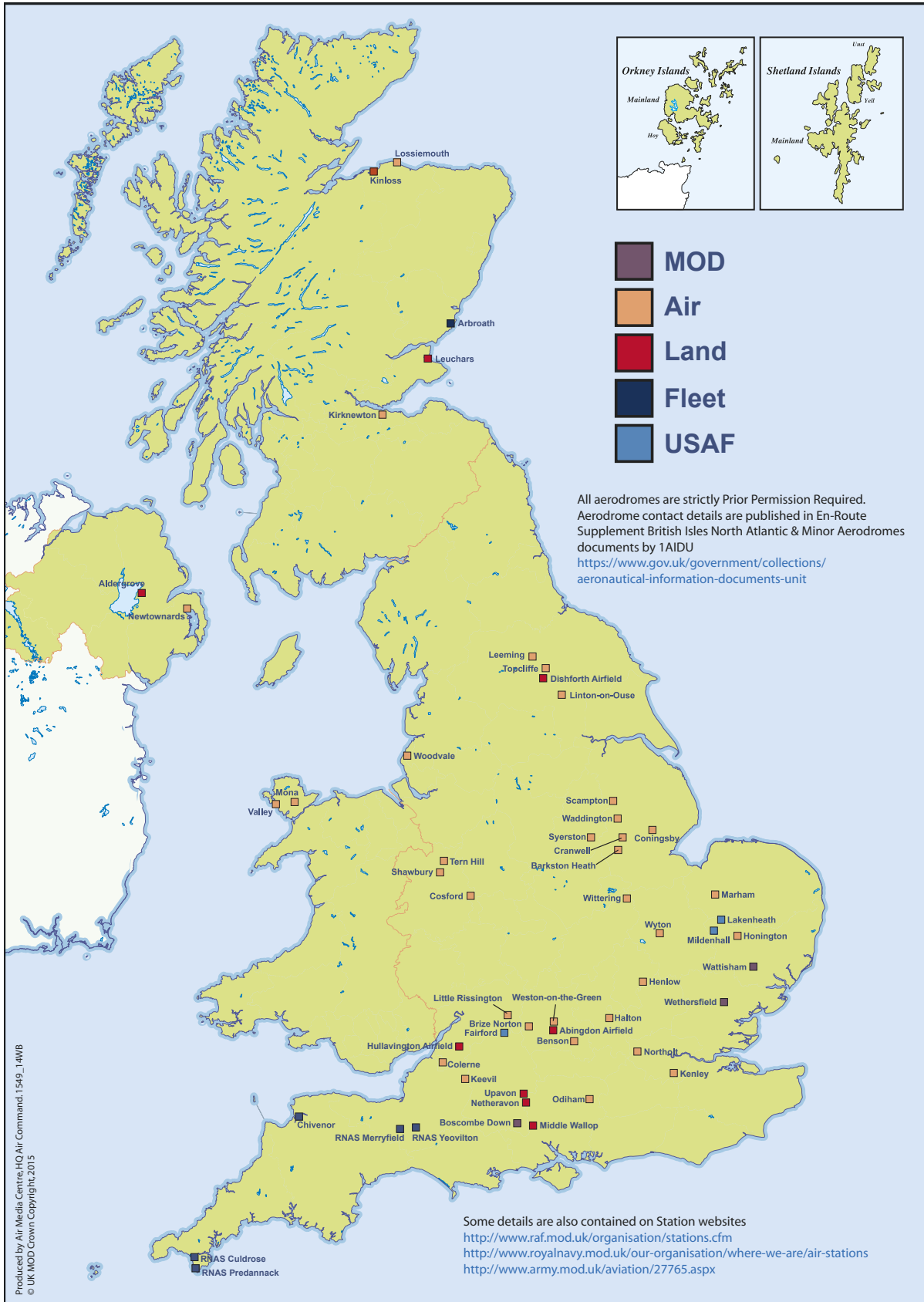
The economic research into GA has concluded that problems with GA access to MoD airfields is a communications rather than a structural problem.

The potential for GA to use MoD facilities is not always well publicised. Therefore, increasing knowledge within the GA sector of how it can gain access to MoD airfields is a simple and cost effective way of boosting the GA sector's usage of such sites. Guidance is already publicised by the CAA, but the Government can still do more to improve this messaging.

Consequently, MoD will work with DfT and the CAA to update this guidance, increase publicity around GA access to military airfields and make better use of communications technology such as emails where appropriate.

MoD are also in the process of rolling out standardised Defence Aerodrome Manuals (DAMs) for each of their airfields which will also contain the contact information which is replicated in aeronautical publications. Currently DAMs for around 15 of the 50 airfields have been rolled out and the rest will be finalised during the course of the year.

A map of MoD airfields is shown below.



The case study below, illustrates how MoD airfields can be utilised by the GA sector.

Case Study – Henlow Aerodrome

RAF Henlow is home to an active military grass airfield where flying has taken place continually since 1918. The airfield is active with military aircraft of 616 Volunteer Gliding Squadron, a service flying club RAF Henlow Aero Club, a service Microlight club and a civilian flying training school Henlow Flying Club. There are also a number of civilian owned and operated aircraft that are either hangared or parked adjacent to the airfield, who pay a monthly license fee for this access under the remit of the Wider Markets Initiative. In addition there are service and civilian model aircraft clubs that also operate on the airfield.

The Gliding Squadron operates Vigilant powered gliders, primarily at weekends but during the summer they conduct flying scholarship courses which run throughout the week. There are routine visits by military helicopters that utilise and integrate with other airfield users. The RAF Henlow Aero Club is formed of service personnel who own their own aircraft and store/operate them from RAF Henlow. Henlow Flying Club is a busy flying club operating 6 aircraft of mixed types and sizes (from two seater up to six seaters) providing flying lessons, corporate flying experience days and general flying club membership and use. The Meridian Microlight Club operates four aircraft. In addition to the two clubs there are in excess of 12 privately owned and operated aircraft that regularly utilise the airfield.

The airfield is operated in accordance with military regulations but assured by both the CAA and MAA. An Aerodrome Operator has been nominated who oversees the robust Safety Management System. A Defence Aerodrome Manual is in the process of being developed in accordance with MAA Military Regulatory Publications. The operation and management of the Henlow Flying Club is carried out in accordance with CAA regulations and subject to CAA inspection and approval. All aircraft that operate from the airfield do so in accordance with the RAF Henlow Flying Order Book, with all parties willing participants in the development and enforcement of airfield orders and Safety Management Systems. Integration of military and civil operators is conducted through robust procedures and accomplished with minimal issue. The airfield has a ground-to-air radio that is operated by Henlow Flying Club for the use and benefit of all airfield users. Quarterly Airfield User Group meetings are held to encourage dialogue and ensure that all users' needs and requirements are met. Emergency procedures are tested through table top and practical exercises involving a wide array of military, civil and emergency services.

Income is generated through both long term lets of buildings (the Henlow Flying Club Ops building), hangarage and parking fees, landing fees in accordance with Joint Service Publication (JSP) 360. Additional use can be offered on an opportunity basis. There are further initiatives to develop closer working relationships between civilian and military operators, for example the potential combination of fuel supplies to provide one source for both military and civil rather than the current two sources.

3. Home Office

GA and border security

We can and must do more to recognise burdens, use modern technology and harmonise the procedures of different state agencies at the border. Border security is a key priority for Government and GA provides particular challenges because of the unscheduled and unpredictable nature of the traffic and the high number of potential landing sites. It is important that we strike the right balance between reducing the regulation of the sector, with ensuring that we have the mechanisms in place to effectively manage issues which may arise.

Pre-notification periods for GA

Border Force (BF) and the police manage GA traffic through a process of advance notification, to allow these flights to be risk assessed, and staff deployed where necessary. The benefit of this to the sector is that many flights are cleared without the crew or passengers having to queue up at an immigration or police control. The timescales for advance notification should enable effective control of the border but not unnecessarily hinder the passage of GA traffic.

HMRC will consult on changes to the Commissioners' Directions before the end of this Parliament and hope to move to a two-hour notification period bringing much needed uniformity and predictability to what the sector is expected to do. HMRC and the Home Office are considering how to harmonise over burdensome notification periods to reduce the impact of these on the GA sector.


The GA sector has previously told us that they would like a 24 hour emergency helpline which they could call if there was an emergency and they had to change arrival point or time due to unexpected circumstances. This was launched on 1st March 2015 and the number will be +44 (0) 845 723 1110.

Simplification of the GAR completion process

BF has launched in partnership with the GA sector, a new online Collaborative Business Portal (CBP), which allows pilots and flight operators to report passenger information to BF and the police in advance, through an electronic General Aviation Report (GAR). BF is also looking to develop an enhanced interface which will enable the wider business community to submit GARs electronically. The aim is for the online CBP to be the main method of GAR submission, which will provide a simplified and streamlined approach for the GA sector.

The link below provides important information and guidance for GA pilots in relation to pre-notification and the GAR process.

<https://www.gov.uk/government/publications/general-aviation-operators-and-pilots-notification-of-flights>



Important information for pilots

General Aviation Reporting

There is now a new method of submitting General Aviation Reports (GAR) for pilots and their representatives on their journeys to and from the UK.



Pilots can now submit GARs using an **online system** that is available at www.aopa.co.uk. They will be automatically distributed to Border Force and the Police through this system as appropriate.

! Please remember the aircraft commander has a legal responsibility for all persons and goods carried.

For more information go to:
<https://www.gov.uk/government/publications/general-aviation-operators-and-pilots-notification-of-flights>

Or email Border Force at:
BorderForceGA@homeoffice.gsi.gov.uk

Working in partnership with

The provision of advance information about individuals on GA flights will enhance UK border security for national security, crime and immigration purposes; and mean that the operation of the UK's security and travel bans authority to carry ('no fly') scheme could in future be extended to GA flights.

Premium border services

The Government aims to provide conditions which enable the UK to remain internationally competitive for GA traffic, including providing the smoothest passage possible for incoming passengers. New arrangements have been developed to manage the provision of premium immigration services for the GA sector, in order to provide a level playing field, and a consistency of approach across the country. Border Force (BF) has defined a standard service for GA as being where the pilot is required to present the passengers to a pre-designated point; and as with standard scheduled services, BF will aim to clear all EEA passengers within 25 minutes of arrival, and non-EEA passengers within 45 minutes. Premium services are voluntary, and the standard service will continue to be provided free of charge

BF will charge for any premium services beyond this, working with flight operators who wish to purchase such services. This could include clearance of passengers on board aircraft, or in a private lounge. BF aim to provide a world class arrivals service for those who wish to purchase these premium services and will continue to engage with the GA business aviation sector on the implementation of the new arrangements which will be in operation from 1st April 2015.

Counter-Terrorism and Security Act

The Counter-Terrorism and Security Act is part of the Government's response to the events and intelligence that led to the recent increase in the UK's terrorism threat level. The Act includes enabling provisions for regulations requiring advance notification for arriving and departing GA aircraft for police and immigration purposes. The detail of the requirement (data content, timescales for advance notification, form and manner of data submission) will be in the regulations. The Government will consult on the proposals for the requirements and will aim for as much harmonisation as possible between the various advance notification requirements. The timing of this will be a matter for the next Government.

4. Department for Business Innovation and Skills (BIS)

Air Services Partnership

BIS welcomes the Air Services Partnership which is currently being developed by British Business and General Aviation (BBGA) as a positive step in addressing the skills challenges facing the sector. BIS and the UK Commission on Employment and Skills will continue to work with the BBGA to provide advice on best practice in engaging with the skills system.

Apprenticeships

The Government is currently reforming its apprenticeships programme in England to ensure that it better meets the needs of employers. This process involves:

- employers developing new apprenticeship standards setting out the knowledge, skills and behaviours needed for an employee to become competent in a particular occupation;
- introducing more rigorous assessment of apprentices with a particular focus on endpoint assessment; and
- giving employers more control over the funding of external training to encourage them to seek out the training that best meets their needs and the needs of their apprentices.

This reform process provides an opportunity for the GA sector to consider how it can utilise apprenticeships in the future to maintain and enhance the skills of its workforce and to develop apprenticeship standards that meet its particular needs.

The aerospace and GA sectors have already developed and secured approval for a number of new airworthiness apprenticeship standards in England (covering Aircraft Maintenance Fitter/Technician, Airworthiness Planning, Quality & Safety Technician and Aircraft Maintenance Certifying Engineer), and are also developing standards covering Aviation Ground Specialist, Aviation Operations Supervisor and Aviation Operations Manager.

The next deadline for submitting expressions of interest to develop new standards is 5 June 2015, and BIS will work with DfT and the GA sector to encourage the sector to develop standards in all occupations that they would like to see covered by apprenticeships in England in future.

Other UK Governments operate their own apprenticeship programme.

Case Study – Cotswold Airport Scholarship Scheme

Cotswold Airport, one of the larger GA aerodromes in the country, has raised its intake of scholars from 10 to 12 for its 2015 Aviation Scholarship. The scheme, which was introduced seven years ago provides teenagers from 14–18 years of age living in the Gloucestershire/Wiltshire area with the opportunity to experience all career options available within the aviation sector. The ethos is to provide them that vital initial experience that will put them on the first rung of the ladder to their chosen career path. Funded by Cotswold Airport's owner, the Scholarship programme has already helped change the lives of over 60 previous scholars, helping them embark on a career in an aviation based industry, whether it be military, commercial flying, engineering or air traffic control. During the scholarships, students receive tuition at the airport's aviation ground school, including flying lessons, experiencing at first-hand the work of air traffic controllers, flying instructors and engineers, whilst receiving guidance from aviation professionals.



Support for businesses in England

Businesses report that they often find it difficult to obtain support to help them to develop and grow. The Government has now made it quicker and easier for every business, both established firms and those starting-up, to get the help that they need. There is now a single place to go for help – www.GREATbusiness.gov.uk – supported by the Business Support Helpline (0300 456

3565), with expert advisers available on the phone or via web chat. This has been developed with business to provide a simple and straightforward way for them to get help to start-up, grow and find sources of finance. The website includes a new “My Business Support” tool (<http://mybusinesssupport.greatbusiness.gov.uk/>) to help businesses quickly and easily identify the support they require.

Business Growth Service in England

<http://www.greatbusiness.gov.uk/businessgrowthservice/>

The Business Growth Service makes it easier for businesses with the right level of ambition, capability and capacity to improve and grow. It brings together the best specialist advice so that businesses can fulfil their growth potential. Tailored packages of support will be offered to help businesses with:

- Accessing finance
- Developing new ideas
- Leadership & management skills
- Manufacturing
- Exporting
- Building networks

The Business Growth Service provides experienced advisers with expertise on what individual businesses need to do to grow, who are able to provide effective solutions. We encourage all GA businesses to consider whether they could benefit from advice or support from this service.

Support for business in Scotland

Business support is delivered differently in Scotland, where the Scottish Government is responsible and committed to maintaining a competitive business environment where businesses can flourish and grow.

The Business Gateway provides a first point of contact for all publicly funded advice to business. It offers a range of assistance and advice for start-up and established companies, including marketing, business advice and planning, financial management and sourcing financial assistance that may

be available to support new, established and growing businesses. Full details of Business Gateway services are available at www.business.scotland.gov.uk and you can call Business Gateway on 0845 609 6611.

Complementing support offered through the Business Gateway, Scotland's enterprise agencies – Scottish Enterprise (www.scottish-enterprise.com) and Highlands & Islands Enterprise (www.hie.co.uk) – offer a range of support and services to those businesses with the potential to grow, including working intensively with over 2,400 companies and offering them tailored account managed services.

Government commitments in this section

10. We will amend planning guidance on the National Planning Policy Framework for England so that it makes appropriate reference to GA aerodromes as part of a network;
11. We will circulate more detailed GA sector guidance from the General Aviation Awareness Council (GAAC) to planning authorities in England on GA matters;
12. We will encourage more proactive engagement between local aerodromes and local communities, Local Planning Authorities and LEPs;
13. We will improve guidance to GA on the use of military aerodromes;
14. We will look to introduce simpler, standard pre-notification periods for GA, simplify the GAR completion process, through an electronic submission option, and introducing a GAR emergency telephone line for notifying changes to GAR information;

15. We will consult on the proposals for requiring advance notification after Royal Assent for the Counter Terrorism and Security Act, and will aim for as much harmonisation as possible between the various advance notification requirements;

16. We will work with the GA sector to encourage the sector to develop standards in all occupations that they would like to see covered by apprenticeships in England in future.

9. Governance

Fees and charges/efficiency

Following a recommendation made by the GA Challenge Panel, the Government has recently undertaken a review of the rate of return which CAA is required to make against its cost of capital charges. The rate has stood at 6% since the late 1990's and was viewed by the aviation industry, and particularly those in the GA sector, as being unnecessarily high particularly when compared with the rates which other similar public bodies were required to make to Government.

Following the review the Government has agreed that the CAA's rate of return should be reduced to 3.5%, in order to bring this into line with the rates of return required by other similar bodies. This represents positive news for the industry and the Government hopes that this reduction will result in lower fees and charges for the GA sector.

The CAA is already required by Government to reduce the fees and charges which it places on the aviation industry by 3% in real terms by the end of 2015/16, based on its 2014/15 baselines. This is part of a continuing drive for the CAA to increase the efficiency with which it operates so that it is able to reduce the costs which are being placed on those who use the services which it provides.

Regulators' Code

The Government introduced a new statutory framework for regulatory delivery – the Regulators' Code – on 6 April 2014, replacing the Regulators' Compliance Code. This provides a clear, flexible and principles-based framework that supports and enables regulators to design their service and enforcement policies in a manner that best suits the needs of businesses and other regulated entities. The Regulators' Code applies to non-economic regulators, as well as local authority regulators. The CAA is required to have regard to the Regulators Code when developing policies and procedures.

Growth duty

The Government is also bringing forward a new duty for non-economic regulators to have regard to economic growth, in the new Deregulation Act. The duty requires regulators to consider the economic consequences of their actions as they carry out their functions, and to be proportionate in decision making, keeping regulatory burdens to a minimum. The duty will apply to over 50 non-economic regulators including the CAA and will come into effect later in 2015. The Government will ensure that the CAA has regard for the growth of the aviation sector, including GA.

Small Business Appeals Champion

The Government’s Small Business, Enterprise and Employment Act requires relevant Ministers to appoint “Small Business Appeals Champions” to regulators including CAA who are within scope of the Act. This measure is designed to aid economic growth.

The role of the Champion will be to ensure the regulator’s appeals and complaints processes provide clear, effective routes so businesses can challenge regulatory decisions when appropriate. Champions will publish an annual report detailing their assessments, with recommendations for any changes. Regulators will need to comply with those recommendations, or explain publicly why they have not done so. It is envisaged that this measure will be implemented in autumn 2015 and we will announce in due course how the Champion will be appointed

and operate in relation to the CAA, including with regard to GA.

CAA commitments to Better Regulation principles

The CAA has committed to the Government’s Better Regulation Principles:

- **Proportionality** – Deliver levels of safety that meet the needs of society and the awareness and acceptance of risk by participants and third parties
- **Accountability** – Understands, recognises and is open to challenge on both its costs and the cost of its interventions on the GA Sector
- **Consistency** – Delivers on the principles of better regulation and benchmarks itself against other national aviation authorities



- **Transparency** – Reform and rejuvenate the CAA's interaction with the GA Sector and ensure more involvement in the decision making process
- **Targeting** – Deregulate, delegate and only do what, by consensus, it is agreed the CAA is best placed to do or what only the CAA can do. Capitalise on the GA Sector's appetite, competence and resilience to take on responsibility. Focus resource in areas of poor safety outcome rather than routine compliance

The CAA's good practice will include the production of formal impact assessments for new policy changes where appropriate.

Reporting – GA Unit annual report

The CAA is publishing its first annual report on the work of the GA Unit on 28th March 2015.

This includes an overview of the role of the GA Unit, achievements from the last year, the GA Programme plan for the next year and success measures for the future.

Ministerial engagement

Ministers have demonstrated their commitment to the programme of work to support GA. The Ministerial Star Chamber has been attended by a number of Ministers from the various Government departments whose policies impact on the sector. The Minister without Portfolio, Grant Shapps chaired this group, and he has also met with and visited a range of GA stakeholders in the course of this work. This engagement sets a good foundation for a future Government to build on.

The General and Business Aviation Strategic Forum (GBASF) will report to the Minister for

Aviation annually, raising any concerns which it has about impacts on the sector. GBASF has an important role to play, as Figure 3 shows, it is the only body at the intersection of Government, Regulator and GA sector activity and so is uniquely placed to bring them together. We see continued engagement by the CAA and the Department for Transport with the GBASF as crucial to ensuring that the GA sector is party to the implementation of this Strategy. The Forum currently monitors both strategic and topical issues of concern to GA. Its terms of reference have been published by the CAA at <https://www.caa.co.uk/docs/224/20080420GASF.pdf>

Government engagement

The Government has committed to continuing meaningful and timely engagement with the GA sector by all Departments whose policy impacts on them: be it in relation to planning, aerospace, border controls, taxation or training matters.

Government commitments in this section

17. Following a recommendation made by the GA Red Tape Challenge Panel we have agreed that the CAA's rate of return should be reduced from 6% to 3.5%;
18. We will ensure that in exercising its non-economic regulatory functions, the CAA has regard for the growth of GA and the rest of the aviation sector;
19. We will appoint a Small Business Appeals Champion to provide assurance to business GA and other commercial aviation sectors that the CAA's appeals and complaints processes provide clear and effective routes;



20. We will continue to engage actively with the GA community including on metrics for success, through the reports and work of the General and Business Aviation Strategic Forum.

10. Metrics, success measures and delivery programme

Metrics

The lack of available and accessible data on GA has been a criticism which has been made both by the CAA during its 2006 Strategic Review of GA and in the final report published by the GA Challenge Panel. York Aviation in its report has also recognised that this is an issue, which makes it difficult for the Government or others to monitor the sector's progress.

Given that the availability of GA data has not changed between 2006 and 2014 the Government and CAA wish to address this lack of data to assess what information could be collected in the future in order to improve the way that the health of the sector can be monitored.

We commissioned York Aviation to look at the issue of metrics as part of their work and will have regard to the Key Performance Indicators that they have suggested in their report published alongside this Strategy and which could form the basis of a set of metrics which could be collected and used to monitor the future health and success of the GA sector. They are:

- Number of GA movements at all UK licensed aerodromes by category (e.g. business aviation and air taxis, training, private etc.) and by aircraft type, monitored on a monthly and annual basis; this information is already collected from a few commercial airports but not from all licensed aerodromes;
- Flying hours by UK registered aircraft by aircraft type, category, and weight; this information is already held in the G-INFO database, but an easier to understand summary analysis could be published on a regular basis;
- Flying hours by non-UK registered aircraft operating within the UK; this information is not currently available and may be difficult to achieve, but an examination of potential sources such as Aerodata, aircraft registration companies in the UK or Eurocontrol should be undertaken;
- Activities of flying training schools in terms of numbers of students embarking on an NPPL or PPL qualification, numbers obtaining licences, numbers of PPL licenses that lapse because of insufficient hours flown, and numbers going on to gain additional ratings or further qualifications such as the CPL; some of this information is already held by the CAA;

- Average age of the UK GA fleet by type and numbers of new aircraft types gaining certifications; this could be derived from the G-INFO database;
- The health of the ‘strategic network of aerodromes’ should also be monitored. It would be useful if there were a central source of information on the numbers of flying sites in the UK, their key characteristics in terms of infrastructure and activity, their geographical location, and the proportion of the total that are fully licensed. A comprehensive central resource such as this does not currently exist.

The collections of some or all of this data would be likely to require regulatory action by the CAA, leading to costs that would need to be met by the GA sector and we will assess the appetite of the GA community for these additional metrics.

Success measures

Because a key focus of the GA Strategy is on issues which are deregulatory, many of the success measures are a matter for the Regulator and are therefore detailed in the Annual Report of the CAA’s GA Unit which is published alongside this Strategy and they are not repeated here.

We are certainly not complacent about the amount of work involved and the time that it will take. Two important priorities are Influencing EASA and making airspace reforms and these are a long game. Even relatively straightforward changes to secondary legislation often take between one and two years to achieve due to the need to consult fully and the limitations imposed by Parliamentary timetables.

Government success measures

Success measure	Goal	How measure is to be reported
Planning authorities in England use the new guidance issued to them	Increased awareness by planning authorities in England of the value of GA	Invitation to respond to guidance when it is disseminated
GA engagement in Government consultations	Increased Government engagement with GA when policies are reviewed and developed	In summaries of responses to consultations
Greater GA use of military airfields	GA access to military airfields is simplified	GA sector feedback to DfT at regular meetings
Number of regulatory provisions disapplied from GA or removed	Reduce the quantum of regulation applying to GA	Statutory instruments drafted and introduced into Parliament



Delivery programme

Similarly the CAA's GA Unit Annual Report sets out a programme for the delivery of deregulation and delegation. The Government has a key role to play in achieving this by delivering deregulatory change through secondary legislation.

11. Annexes

Annex A

Summary of findings from the economic research into GA

The full report can be accessed at the link below;

<http://www.gov.uk/dft#publications>

General Aviation Economic Research Study: Summary of Key Findings

Department for Transport

March 2015

The total economic impact of GA on the UK economy is around £3.0 billion of Gross Value Added (GVA) and supports in excess of 38,000 jobs

- For the purposes of this research, we took a broad definition of 'general aviation' (GA) to refer to all flying activity other than that undertaken by commercial air transport operating to a schedule and military flying. GA therefore includes business aviation.
- While there are some difficulties in combining the quantitative outputs from the different pieces of analysis undertaken in this study, primarily relating to uncertainty around the extent to which benefit is retained within the UK and to which different strands of analysis interlink, a reasonable estimate can be made of the total impact on the UK from activities associated with GA. In Gross Value Added terms, this total includes:
 - an economic footprint from GA flying operations of £1.1 billion;
 - the export component of GA manufacturing of around £1.1 billion;
 - the additional wider benefits deriving from the use of business aviation of at least £0.8 billion.
- Combining these figures would suggest a total economic impact on the UK economy of around £3.0 billion of GVA. While this figure should be regarded with some caution, we believe it provides a reasonable representation of the magnitude of the total impact of GA activities on the UK economy.
- We also estimate that there are around 9,700 jobs supported by GA flying activity in the UK, measured at the aerodrome level, and around 28,400 jobs supported by GA manufacturing, making a total in excess of 38,000 jobs supported.

The wider economic and social impacts of GA are significant.

- Significant wider economic impacts arise from the use of GA aircraft for business purposes such as air taxis and the additional connectivity this offers over either commercial air transport or surface transport modes. Business aviation in particular offers major benefits to users in facilitating inward investment or supporting export markets. This can take the form of corporately owned aircraft, fractional ownership, chartered air taxis, or the use of private aircraft for business purposes.
- Quantifying this wider economic value, in terms of the long run impact on inward investment, trade and productivity, is extremely difficult given the lack of data. However, as an illustration of the potential based on a series of assumptions, we estimated that there could be a long run impact on UK GDP of around £815 million per annum from business aviation alone (noted in the figures above).
- There could also be benefits that arise from GA flying in terms of enhancing quality of life and the physical and mental wellbeing of participants as they pursue their GA flying activity. The sporting activities undertaken by some sub-sectors of GA flying also form part of the wider socio-economic benefits of sporting activity generally. However, these impacts cannot sensibly be quantified.
- The use of GA by the emergency services such as the Police and Air Ambulance also contributes important benefits to society.

However, there has been a decline in activity in the sector in recent years

- There has been a significant decline in flying activity in the UK GA sector in recent years. CAA aerodrome movement data shows a decline in aero club and private flying of around 45% since 2005 at the reporting airports. By contrast, business aviation and air taxis have experienced growth in movements of around 7% since 2005. Whilst this market is recovering from the recession, there is evidence of more sluggish growth in recent years and a slight fall in 2013, although anecdotally 2014 is reported as seeing an upturn.
- A further perspective is provided by the number of flying hours by UK registered aircraft recorded by the CAA (and supplemented by hours recorded by the British Gliding Association). The decline in hours flown by light aircraft is particularly marked, with fixed wing aircraft from 751kg to 5,700kg down by 50% on 2005, and fixed wing aircraft of under 750kg down by 35%.
- This clearly has an implication for the economic impact of the sector. A previous study identified the economic value of GA to the UK economy at around £1.4 billion in 2005, which equates to around £1.7 billion at 2013 prices. This suggests that the fall in the economic value of the sector since 2005 in real terms has been around 39%.
- There is perhaps no single overriding reason for the decline, but clearly the recession had a significant impact, with business travel falling and disposable incomes heavily squeezed. However, there are other factors which may have contributed in some degree, including costs, the age of the fleet, the lack of new student pilots and the burden of regulation, particularly that imposed by the European Aviation Safety Agency (EASA).

Reviving the GA sector to 2005 levels could add a further £0.7 billion to the economic footprint

- The strong link between the economic value of the GA sector and the level of activity suggests that if GA can be re-invigorated then the economic contribution of the sector could be increased and potentially reach levels similar to those observed in the pre-recession era. By way of demonstration, if flying hours were to increase to levels similar to that seen in 2005, the economic footprint of the sector, based on the current valuation, would be around £1.8 billion (rather than the £1.1 billion referred to above).
- We considered constraints that may be holding the sector back in terms of being able to return its economic footprint to pre-recession levels and what opportunities may exist to encourage a return to growth. In this report, we have given particular consideration to issues such as the strategic network of GA aerodromes in the UK, flying training, business aviation, and product innovation.
- The CAA's current and future work programme to address the regulatory burden on the sector clearly remains critical, but it may not be sufficient in itself. There is a significant threat to the future of GA flying from 'disruptive technologies' such as drones and advanced computer flight simulators. The industry must evolve or risk continued decline. Attracting new student pilots into the GA sector is fundamental to its future. The sector also needs to consider its image and market itself in such a way as to broaden its appeal to younger people.

Recommendations for Government consideration

Planning and the Network of UK Aerodromes

A	It is recommended that Government should consider preparing and publishing, in consultation with the GA industry and other relevant stakeholders, policy guidance for local authorities in dealing with planning issues affecting aerodromes; this guidance should explicitly acknowledge the strategic network of UK aerodromes as a national asset and the aim should be to bring a consistent approach to decisions taken by local planning authorities and, thereby, to offer specific protection to the strategic network. The report provides an initial framework of issues that might be considered in drawing up such guidance.
B	The report sets out a particular role for Local Enterprise Partnerships (LEPs) in supporting the positive economic benefits that derive from local aerodromes and recommends that Government should take steps to promote a more 'joined up' approach between the strategies of LEPs and the planning system.
C	It is recommended that Government and local authorities should encourage GA aerodromes to be proactive in engaging with their local communities, with local planners, and with other local stakeholders (such as LEPs) to identify and promote the social and economic value of the activities undertaken on their sites, as well as mitigating the adverse environmental impacts of their operations as far as possible.

Training

D	<p>Training is a critical component of the health of the GA sector. Without new student pilots feeding through, the industry may continue to decline. It is recommended that Government should consider ways in which it can support GA training providers and make it easier for student pilots to take up flying. Specifically, further consideration should be given to:</p> <ul style="list-style-type: none"> • the case for lifting VAT on some forms of flying training; • the case for exploiting the provisions of EU Directive 2003/96/EC to allow fuel used for flight training in a commercial organisation to qualify for fuel duty relief; and • encouraging practical links between local GA aerodromes, training providers, and other Government training initiatives such as those in the STEM subjects.
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Recommendations for Government consideration (cont'd)

Business Aviation/Air Taxis

E	It is recommended that Government should recognise more explicitly the economic importance to the UK of the business aviation sector, both in terms of its direct economic footprint and the wider and often unseen benefits it can bring to the UK economy. Consultation with the industry on matters such as APD and Border Controls should be improved so that ways can be found to alleviate the constraints on the business aviation sector and thus facilitate its growth and economic impact. The use of air taxis for business purposes could be facilitated by more robust support for a strategic network of aerodromes in the UK.
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Regulation

F	The work of the CAA and its GA Unit to date has brought significant benefits to the sector in lifting regulatory constraints and has been welcomed by the industry as a whole. It is recommended that Government should continue to support the current and future work programme of the CAA and its dealings with EASA in this area and ensure the CAA's work is adequately resourced.
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Product Innovation

G	The GA sector must find ways of marketing itself to a newer, younger generation of students, without which it will continue to decline. Product innovation is a key component of this as young people find it increasingly less attractive to take up flying in increasingly ageing aircraft. The CAA's consultation on easing airworthiness and operational approval for experimental light aircraft designs is a positive step forward and it is recommended that Government should consider whether there are other opportunities to encourage and support the GA manufacturing industry in the UK as it develops new and innovative aircraft designs more likely to appeal to the younger market.
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Future Monitoring

- The research has also flagged up a lack of accessible and robust data that covers the whole of the GA sector. It is noted that the routine monitoring of the UK GA sector in future whether by Government or by any other party will prove to be extremely difficult unless this issue is addressed. It is recommended that consideration be given to incorporating this into the CAA's future programme of work.

- Ultimately, the research has shown that the economic contribution of the sector is directly linked to the volume of flying undertaken so the simplest proxy measure for the health of the sector is the number of flying hours, to which all other measures would be secondary. However, recommendations have also been made regarding other areas of data collection which will assist with monitoring the future health of the sector.

Annex B

Map of UK GA airfields

A higher quality version available at
<http://www.ead.eurocontrol.int/eadbasic/pamslight-6789B2281F6440AAF6ADBA5C779C044F/7FE5QZZF3FXUS/EN/AIP/AD/EG AD 1 3 en 2015-02-05.pdf>

