

## CONSULTATION RESPONSE SHEET

CONSULTATION TITLE:

draft implementing rule on Standardised European Rules of the Air  
Enclosure 3



Please return this response sheet by **12 April 2010** to:

Mr Olivier MROWICKI,  
SES Mandate Manager SERA,  
EUROCONTROL,  
Rue de la Fusée, 96,  
B – 1130 BRUSSELS,  
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or by E-mail to [sesframework@eurocontrol.int](mailto:sesframework@eurocontrol.int)

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### **NOTES FOR THE USE OF THE CONSULTATION RESPONSE SHEET**

1. All comments on the associated Consultation material must be made using this response sheet. Comments submitted not using this sheet will be referred back to the originator.
2. As a minimum, Sections 1, 2, 4, 5 and 6 of the Response Sheet Main Page must be completed before returning the response.
3. Formal comments are invited on the contents of the draft implementing rule on Standardised European Rules of the Air (SERA) (Enclosure 1). *Please do **not** submit comments on the draft justification material (Enclosure 2).*
4. Comments should be as specific as possible, including a reason/explanation for the comment and, where applicable, a proposed replacement text.
5. Each response return must be signed and dated by an appropriate person with the authority to authorise comments on behalf of the stated organisation.

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## MAIN PAGE

### 1. ORGANISATION COMMENTING

Organisation Name:	Light Aircraft Association UK	
Contact Name: <sup>1</sup>	John Brady	
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### 2. GENERAL RESPONSE<sup>2</sup>

Acceptable without amendment:

Acceptable but would be improved with amendments:

Not acceptable but would be acceptable with amendments:

Not acceptable under any circumstances:

3. SPECIFIC COMMENTS: See pro forma over page.

### 4. COMPOSITION OF RESPONSE

This response consists of the following:

This Page **PLUS** (enter number)  attached comments sheets.

### 5. ASSOCIATION OF NAME WITH COMMENTS:

I do **not** agree to my name/organisation being associated with the comments provided.<sup>3</sup>

### 6. VALIDATION

Name: John Brady

Position: Vice-Chairman

Signature:

Date: 9 April 2010

<sup>1</sup> This is the person who is to be contacted directly to discuss or clarify the submitted comments. A single point of contact is requested.

<sup>2</sup> Show your overall acceptance position **on Enclosure 1** by an 'X' in the appropriate response box.

<sup>3</sup> Comments will be published with reference to their source unless a specific request is made **not** to do.

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**Organisation Name:** Light Aircraft Association UK

**Form No.**  **of**

**Paragraph Reference  
(Article/Recital etc):**

General

**Comment:**

The Light Aircraft Association of the UK represents some 8000 members concerned with General Aviation. We are concerned that your proposal meets the needs of commercial aircraft operations flying IFR in CAS but that operation is so structured that the Rules of the Air are of no real consequence to the operator. On the other hand, sporting and recreational aviation operating mainly outside CAS and which forms the overwhelming majority of aircraft on Union registers is effected significantly but appears to have been excluded from consideration prior to this point. Their interests and reasonable requirements have not been included in the draft.

In the UK, sporting and recreational aircraft account for 96% of aircraft, for some 78% of all pilots and have approximately 28% of the total aircraft seat capacity. We have no reason to believe the figures across the Union are different so we are clearly the largest group within civil aviation.

You must make the Rules of the Air appropriate and proportionate for this majority group.

**Reason(s) for Comment:**

General and sporting aviation interests have been excluded from the draft SERA.

**Proposed Change/Text (where applicable):**

See later comment sheets

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## COMMENTS SHEET<sup>4</sup>

**Organisation Name:** Light Aircraft Association UK

**Form No.**  **of**

**Paragraph Reference (Article/Recital etc):**

### **Comment:**

#### **Definition 2 Aerobatic flight**

As gliders and aircraft need to perform abrupt changes in attitude as part of normal operations either this definition should be changed and a difference filed.

### **Reason(s) for Comment:**

Draft does not take account of normal operations

### **Proposed Change/Text (where applicable):**

2. 'Aerobatic flight' means manoeuvres intentionally performed by an aircraft involving an abrupt change in its attitude, an abnormal attitude, or an abnormal variation in speed. ***"but excluding manoeuvres necessary for normal flight and flight training"***

<sup>4</sup> This pro forma may be copied as many times as necessary - ensure that each sheet is correctly numbered and that the main page shows the total number of pro formae you are submitting.

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### COMMENTS SHEET<sup>5</sup>

**Organisation Name:** Light Aircraft Association UK

**Form No.**  **of**

**Paragraph Reference  
(Article/Recital etc):**

**Definition 70**

**Comment:**

**Definition 70 Gliders**

This definition excludes self launching sailplanes and self sustaining sailplanes which are included in the equivalent EASA definition in FCL 101. These rules need to be made consistent with FCL 101 by amending it.

A difference would then need to be filed.

**Reason(s) for Comment:**

Rule inconsistent with FCL101.

Rule ignores many gliders

**Proposed Change/Text (where applicable):**

**70. 'Glider' means a heavier-than-air aircraft that is supported in flight by the dynamic reaction of the air against its fixed lifting surfaces, the free flight of which does not depend on an engine.**

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### COMMENTS SHEET<sup>6</sup>

**Organisation Name:** Light Aircraft Association UK

**Form No.**  **of**

**Paragraph Reference  
(Article/Recital etc):**

**2.3.2.1 Pre-flight Action**

**Comment:**

This rule which is a direct copy of the ICAO equivalent requires that the pilot-in-command of an aircraft shall become familiar with all available information. In the internet age the volume of information available is vast and is not possible or necessary to review all information.

**Reason(s) for Comment:**

Rule is impracticable

**Proposed Change/Text (where applicable):**

**2.3.2.1 Pre-flight Action** *Before beginning a flight, the pilot-in-command of an aircraft shall become familiar **with sufficient information appropriate to the intended flight.***"

A difference will be needed

<sup>6</sup> This pro forma may be copied as many times as necessary - ensure that each sheet is correctly numbered and that the main page shows the total number of pro formae you are submitting.

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### COMMENTS SHEET<sup>7</sup>

**Organisation Name:** Light Aircraft Association UK

**Form No.**  **of**

**Paragraph Reference  
(Article/Recital etc):**

**3.1.2.1. Open-air assembly of persons**

**Comment:**

The phrase "an open-air assembly of persons" needs to be defined in article 2 otherwise any group of a few people could count as an assembly. In UK it is defined as 1000 persons and we propose this be adopted.

**Reason(s) for Comment:**

Rule is open ended.

**Proposed Change/Text (where applicable):**

**3.1.2.1. Open-air assembly of persons**

*Aircraft shall not be flown over ....**an open-air assembly of more than 1000 persons,** unless at such a height as will permit, in the event of an emergency arising, a landing to be made without undue hazard to persons or property on the surface.*

<sup>7</sup> This pro forma may be copied as many times as necessary - ensure that each sheet is correctly numbered and that the main page shows the total number of pro formae you are submitting.

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### COMMENTS SHEET<sup>8</sup>

**Organisation Name:** Light Aircraft Association UK

**Form No.**  **of**

**Paragraph Reference  
(Article/Recital etc):**

**3.1.2.1. *Minimum heights for VFR and IFR flights***

**Comment:**

Our comments on this section are listed under para 4.6 and 5.1.2

**Reason(s) for Comment:**

Rule is a duplicate of 4.6 and 5.1.2

**Proposed Change/Text (where applicable):**

See our comments on paragraph 4.6 and 5.1.2

<sup>8</sup> This pro forma may be copied as many times as necessary - ensure that each sheet is correctly numbered and that the main page shows the total number of pro formae you are submitting.

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### COMMENTS SHEET<sup>9</sup>

**Organisation Name:** Light Aircraft Association UK

**Form No.**  **of**

**Paragraph Reference  
(Article/Recital etc):**

**3.1.4.1 Dropping or spraying**

**Comment:**

Dropping ballast in the form of water is a normal part of safe glider flying and dropping a tow rope is a normal part of safe glider tug operations.

**Reason(s) for Comment:**

Rule prohibits normal operations and calls up another unspecified union regulation.

**Proposed Change/Text (where applicable):**

Rule should be deleted

<sup>9</sup> This pro forma may be copied as many times as necessary - ensure that each sheet is correctly numbered and that the main page shows the total number of pro formae you are submitting.

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### COMMENTS SHEET<sup>10</sup>

**Organisation Name:** Light Aircraft Association UK

**Form No.**  **of**

**Paragraph Reference  
(Article/Recital etc):**

3.1.7 Aerobatic Flight

**Comment:**

Aerobatics are a normal part of safe aeroplane and glider operations.

**Reason(s) for Comment:**

Rule prohibits normal operations and calls up another unspecified union regulation

**Proposed Change/Text (where applicable):**

Rule should be deleted

<sup>10</sup> This pro forma may be copied as many times as necessary - ensure that each sheet is correctly numbered and that the main page shows the total number of pro formae you are submitting.

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## COMMENTS SHEET<sup>11</sup>

**Organisation Name:** Light Aircraft Association UK

**Form No.**  **of**

**Paragraph Reference  
(Article/Recital etc):**

**3.2.3.1 and 3.2.3.3.3 Overtaking.**

**Comment:**

This rule is more complex than the ICAO definition and requires the overtaking aircraft to alter heading to the right and for the aircraft being overtaken to maintain its heading and speed.

The rule does not take into account the protocols which have been developed and implemented for normal safe glider flying: if translated into Community law they would preclude safe exercise of these protocols.

You have not drafted a common difference to cover this

**Reason(s) for Comment:**

Thermal Flying

While using thermals it is normal for gliders to circle together, with gliders joining and leaving each other as tactical soaring opportunities change. The rules are not appropriate to this normal, safe flying.

Soaring

Since the sport's very inception, gliders, of all sorts, have soared hills and mountains – safely. A crucial part of the procedures that have evolved is the standard protocol that all turns must be made away from the hill. For a glider being overtaken, this is possible only if the overtaking glider does so on the side of hill.

**Proposed Change/Text (where applicable):**

3.2.3.1 The aircraft that has the right-of-way shall maintain its heading and speed. *A glider may continue with circling flight.*

3.2.3.3.3 *Overtaking.* ..... the overtaking aircraft, whether climbing, descending or in horizontal flight, shall keep out of the way of the other aircraft by altering its heading to the right, ..... *. A glider overtaking another glider may alter its course to the right or to the left*

<sup>11</sup> This pro forma may be copied as many times as necessary - ensure that each sheet is correctly numbered and that the main page shows the total number of pro formae you are submitting.

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**Organisation Name:** Light Aircraft Association UK

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**Paragraph Reference  
(Article/Recital etc):**

**3.2.4.1.2 b) Lights to be displayed on the manoeuvring area**

**Comment:**

Although in accord with ICAO, the requirement to light or illuminate stationary aircraft is not practicable at many small aerodromes. Many aerodromes are not equipped for night operations and most have no provision for general illumination of the area. Position lights cannot be left on as aircraft batteries would be exhausted.

General illumination would be contrary to Union policies on energy use

**Reason(s) for Comment:**

This rule may be suitable for commercial airports but it is impracticable for smaller aerodromes.

**Proposed Change/Text (where applicable):**

*b) **Where practicable**, unless stationary and otherwise adequately illuminated, all aircraft on the movement area of an aerodrome shall display lights intended to indicate the extremities of their structure*

A difference will need to be filed

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### COMMENTS SHEET<sup>12</sup>

**Organisation Name:** Light Aircraft Association UK

**Form No.**  **of**

**Paragraph Reference  
(Article/Recital etc):**

**3.2.3.4.2 Hold at all runway holding positions**

**Comment:**

In accord with ICAO, this rule requires aircraft to hold at all runway holding positions unless cleared by the aerodrome control tower but some aerodromes do not have a tower or have a tower that is not always in operation or have an ATC officer who is not able to give clearances.

Moreover "control tower" is not defined or used elsewhere as a source of clearance.

Aircraft must also hold before entering a runway to take-off as well as to cross so the proper wording would be "hold before entering"

**Reason(s) for Comment:**

The phrase "aerodrome control tower" is not defined and whilst many small aerodromes have a "control tower", many do not offer an "air traffic control service" all the time. Some do not offer it at all. This rule is inappropriate for small aerodromes which comprise the majority of aerodromes within the Union.

**Proposed Change/Text (where applicable):**

*3.2.3.4.2 **At a controlled aerodrome** an aircraft taxiing on the manoeuvring area shall stop and hold at all runway-holding positions unless an explicit clearance to **enter** ~~cross~~ the runway has been issued. ~~by the aerodrome control tower.~~*

A difference will need to be filed

<sup>12</sup> This pro forma may be copied as many times as necessary - ensure that each sheet is correctly numbered and that the main page shows the total number of pro formae you are submitting.

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### COMMENTS SHEET<sup>13</sup>

**Organisation Name:** Light Aircraft Association UK

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**Paragraph Reference  
(Article/Recital etc):**

3.2.4.2 display of lights

**Comment:**

Paragraph 3.2.4.2 appears to be a rule on display of lights on the ground outside the hours of darkness duplicating paragraph 3.2.4.1 but its sequence has been changed from ICAO making it barely understandable.

**Reason(s) for Comment:**

The first line refers to "such lights". What lights? This phrase needs to be repositioned at the end.

For the reasons given in our comments on paragraph 3.2.4 this is unsafe.

The warning light system of many aircraft (eg PA-28R Arrow, PA-34 Seneca, PA-27 Aztec and PA-44 Seminole) are constructed such that when navigation lights are switched on the warning and indicating lights in the cockpit, including the undercarriage position lights, are dimmed. This is designed for flight at night but if navigation lights are switched on by day in bright conditions the warning lights cannot be seen creating a safety hazard to the aircraft, its occupants and persons and property on the ground.

It is unsafe for certain aircraft to display navigation lights during daytime either on the ground or in the air.

**Proposed Change/Text (where applicable):**

Paragraph should be deleted and a difference filed.

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### COMMENTS SHEET<sup>14</sup>

**Organisation Name:** Light Aircraft Association UK

**Form No.**  **of**

**Paragraph Reference  
(Article/Recital etc):**

**3.2.6.1 d) land and take off into the wind**

**Comment:**

Helicopters often land out of wind, due to their manoeuvrability, especially at private sites.

Balloons always have to land downwind for obvious reasons

**Reason(s) for Comment:**

Rule does not take account of helicopter and balloon operations

**Proposed Change/Text (where applicable):**

d) *except for helicopters and balloons*, land and take off into the wind unless safety, the runway configuration, or air traffic considerations determine that a different direction is preferable.

A difference will need to be filed.

<sup>14</sup> This pro forma may be copied as many times as necessary - ensure that each sheet is correctly numbered and that the main page shows the total number of pro formae you are submitting.

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### COMMENTS SHEET<sup>15</sup>

**Organisation Name:** Light Aircraft Association UK

**Form No.**

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**Paragraph Reference  
(Article/Recital etc):**

**3.3.1.2 a) Flight Plans required for any IFR flight.**

**Comment:**

This paragraph extends the requirement for flight plans well beyond the ICAO requirement and for no useful or safety purpose. We object to this extension.

It requires a flight plan for all IFR flights whereas ICAO only requires it for IFR flights in advisory airspace.

**Reason(s) for Comment:**

There is no purpose in filing a flight plan for an IFR flight in airspace in which no ATC separation is provided.

This rule would require a flight plan for a flight which includes a minor portion operated under IFR, for example to cross a CTR.

This rule would require a flight plan for a VFR flight which includes a minor portion operated under IFR when climbing or descending in Class G airspace.

None of this is necessary for safety reasons.

The volume of flight plans generated for VFR flights with a minor IFR portion would overwhelm the ATC system.

The burden on sporting and recreational aviation would be substantial. It is not proportionate regulation.

**Proposed Change/Text (where applicable):**

3.3.1.2 A flight plan shall be submitted prior to operating:  
a) any IFR flight *within advisory airspace*.

<sup>15</sup> This pro forma may be copied as many times as necessary - ensure that each sheet is correctly numbered and that the main page shows the total number of pro formae you are submitting.

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### COMMENTS SHEET<sup>16</sup>

**Organisation Name:** Light Aircraft Association UK

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**Paragraph Reference  
(Article/Recital etc):**

3.3.1.2 Flight Plans required for VFR flight.

**Comment:**

Para 3.3.1.2 omits the note included with the equivalent ICAO rule which defines the term "flight plan" as used in this paragraph. This note is vital to the proper application of the rule.

No common difference is listed to draw attention to the omission or the very significant and onerous requirements that would arise..

**Reason(s) for Comment:**

The rule requires a flight plan for all VFR flights to be provided with an ATC service. In the ICAO rules there is a note after this paragraph that says:

*NOTE: the term "flight plan" is used to mean variously, full information on all items comprised in the flight plan description, covering the whole route of a flight, or limited information required when the purpose is to obtain a clearance for a minor part of a flight such as to cross an airway, to take off from or to and at a controlled aerodrome.*

With that note included in the rule, filing a flight plan (for these purposes) would only mean calling on the radio for a clearance in the usual way so would not be a problem. The proposed rule would cause all VFR flights that need a clearance to taxi or which might need an ATC service during flight to file a full flight plan before take-off.

**Proposed Change/Text (where applicable):**

The ICAO note must be included at the end of paragraph 3.3.1.2

<sup>16</sup> This pro forma may be copied as many times as necessary - ensure that each sheet is correctly numbered and that the main page shows the total number of pro formae you are submitting.

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### COMMENTS SHEET<sup>17</sup>

**Organisation Name:** Light Aircraft Association UK

**Form No.**  **of**

**Paragraph Reference  
(Article/Recital etc):**

**3.3.1.4 Flight plan required for international flights least sixty minutes before departure**

**Comment:**

At the moment aircraft can depart from many Union countries as soon as a FPL is filed. As the whole purpose of SES is reduce the burden of transfer between national airspace blocks, it is inappropriate to apply this rule within the Union.

For flights crossing Union borders, the rule serves no useful purpose and will delay international traffic unnecessarily.

The rule serves no useful purpose for flights and should be removed by a difference with ICAO.

**Reason(s) for Comment:**

Inappropriate to apply this rule within the Union

**Proposed Change/Text (where applicable):**

Rule to be deleted and a difference files

<sup>17</sup> This pro forma may be copied as many times as necessary - ensure that each sheet is correctly numbered and that the main page shows the total number of pro formae you are submitting.

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### COMMENTS SHEET<sup>18</sup>

**Organisation Name:** Light Aircraft Association UK

**Form No.**  **of**

**Paragraph Reference  
(Article/Recital etc):**

**3.3.5 Closing a Flight Plan**

**Comment:**

It was established many years ago that VFR flight plans ending in the UK do not need to be closed when the destination does not have an ATC facility. This is sensible and should be adopted

**Reason(s) for Comment:**

Impracticable to apply at small airfields having no ATC service

**Proposed Change/Text (where applicable):**

Paragraph should be deleted and a difference filed

<sup>18</sup> This pro forma may be copied as many times as necessary - ensure that each sheet is correctly numbered and that the main page shows the total number of pro formae you are submitting.

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### COMMENTS SHEET<sup>19</sup>

**Organisation Name:** Light Aircraft Association UK

**Form No.**

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**Paragraph Reference  
(Article/Recital etc):**

3.4.4 Qualification of marshallers.

**Comment:**

Although compliant with ICAO, this rule would effectively introduce an EU wide national marshallers' licence which would be expensive and pointless.

Impracticable to operate for small airfields and flying sites.

Such rules are a matter for licensing and not for rules of the air and are beyond the competence of Eurocontrol.

Any authorisation should be a matter for local management

**Reason(s) for Comment:**

Introduces a licensing regime for any person guiding an aircraft. At small airfields aircraft guiding might have to be discontinued to comply with the rule.

**Proposed Change/Text (where applicable):**

The paragraph should be deleted and a difference filed.

<sup>19</sup> This pro forma may be copied as many times as necessary - ensure that each sheet is correctly numbered and that the main page shows the total number of pro formae you are submitting.

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### COMMENTS SHEET<sup>20</sup>

**Organisation Name:** Light Aircraft Association UK

**Form No.**  **of**

**Paragraph Reference  
(Article/Recital etc):**

**3.4.5 and 3.4.6 Defines clothing and equipment for  
marshallsers**

**Comment:**

This is copied directly from ICAO rule which is now out of date. Today at all main aerodromes all persons airside must wear high visibility jackets so marshallsers are no longer identifiable by these "distinctive jackets"

**Reason(s) for Comment:**

Rule no longer practicable

**Proposed Change/Text (where applicable):**

Delete rule and file a difference.

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### COMMENTS SHEET<sup>21</sup>

Form No.  of

**Paragraph Reference  
(Article/Recital etc):**

**Comment:**

**Reason(s) for Comment:**

**Proposed Change/Text (where applicable):**

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**Organisation Name:** Light Aircraft Association UK

**Form No.**  **of**

**Paragraph Reference  
(Article/Recital etc):**

3.9. Table 3-2 VFR Minima

**Comment:**

In Class C, D and E Airspace, VFR flight should be allowed by aircraft, other than helicopters, at or below 3000 ft amsl at a speed of 140 kt or less, which remain clear of cloud and in sight of the surface and in a flight visibility of at least 5 km.

Helicopters should be able to fly under VFR in Class C, D or E Airspace at or below 3000 ft amsl provided that they remain clear of cloud and in sight of the surface.

**Reason(s) for Comment:**

These rules currently apply in the UK and operate safely. Application of the proposed rule would require extensive use of special VFR clearances which are unnecessary and add burden to ATC services.

**Proposed Change/Text (where applicable):**

Amend airspace classification box associated with "*clear of cloud and in sight of the surface*" to C D E F G

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**Paragraph Reference  
(Article/Recital etc):**

4.2 VFR Rules

**Comment:**

Para 4.2 refers to an aerodrome traffic pattern but this is not defined or included in the definitions.

**Reason(s) for Comment:**

Loose drafting

**Proposed Change/Text (where applicable):**

Define aerodrome traffic pattern or change para 4.2 to remove the term.

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**Paragraph Reference  
(Article/Recital etc):**

4.2 VFR Rules

**Comment:**

Within a CTR or ATZ, neither the cloud ceiling nor visibility minima should apply to a helicopter operating below 3000 ft amsl provided that it remains clear of cloud, with the surface in sight and in a flight visibility of at least 1500 m.

**Reason(s) for Comment:**

These rules currently apply in the UK and operate safely. Application of the proposed rule would require extensive use of special VFR clearances which are unnecessary and add burden to ATC services.

**Proposed Change/Text (where applicable):**

Add new para 4.2 c)

***Helicopters are exempt from this rule***

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**Paragraph Reference  
(Article/Recital etc):**

4.2 VFR Rules

**Comment:**

The rule would prevent an aircraft approaching an airfield where there is no air traffic control unit that is authorised to issue such a clearance.

**Reason(s) for Comment:**

The rule would be impracticable at aerodromes with an ATZ but without an operational ATC service

**Proposed Change/Text (where applicable):**

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**Organisation Name:** Light Aircraft Association UK

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**Paragraph Reference  
(Article/Recital etc):**

4.2 VFR Rules

**Comment:**

Within a CTR or ATZ or traffic pattern, neither the cloud ceiling nor visibility minima should apply to an aircraft operating below 3000 ft amsl provided that it remains clear of cloud, with the surface in sight and in a flight visibility of at least 1500 m.

**Reason(s) for Comment:**

These rules currently apply in the UK and operate safely. Application of the proposed rule would require extensive use of special VFR clearances which are unnecessary and add burden to ATC services.

Aerodromes with no ATC service would be closed when conditions fell below 1500ft/5km

**Proposed Change/Text (where applicable):**

Delete para 4.2 and apply a difference if necessary

## CONSULTATION RESPONSE SHEET

CONSULTATION TITLE:

draft implementing rule on Standardised European Rules of the Air  
Enclosure 3



**Organisation Name:** Light Aircraft Association UK

**Form No.**  **of**

**Paragraph Reference  
(Article/Recital etc):**

4.3 Rules for VFR at night

**Comment:**

Para 4.3 a) requires a flight plan to be filed for flight outside the circuit but there is no valid safety reason for that. It should be deleted.

**Reason(s) for Comment:**

There is no safety requirement to file a flight plan for night VFR flights

**Proposed Change/Text (where applicable):**

Paragraph a) should be deleted.

## CONSULTATION RESPONSE SHEET

CONSULTATION TITLE:

draft implementing rule on Standardised European Rules of the Air  
Enclosure 3



**Organisation Name:** Light Aircraft Association UK

**Form No.**  **of**

**Paragraph Reference  
(Article/Recital etc):**

4.3 Rules for VFR at night

**Comment:**

Para 4.3 c) iii) requires that below 3000ft the pilot must be in sight of the surface. There is no safety reason why this should be so and at night it is very likely that the surface will not be visible making it impossible to comply. This rule should be deleted.

**Reason(s) for Comment:**

The surface is not normally visible at night making this rule impracticable

**Proposed Change/Text (where applicable):**

Delete para iii)

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draft implementing rule on Standardised European Rules of the Air  
Enclosure 3



**Organisation Name:** Light Aircraft Association UK

**Form No.**  **of**

**Paragraph Reference  
(Article/Recital etc):**

4.6 Minimum heights for VFR flight.

**Comment:**

The minimum height of 500 ft agl except when taking-off and landing would prevent the practice of engine failures after take-off, practice approaches and practice forced landings resulting in a reduction in training and safety standards. A protocol to allow these exercises needs to be included in the Rule.

**Reason(s) for Comment:**

Reduction in training and safety

**Proposed Change/Text (where applicable):**

Amend para 4.6 to include "*Except when necessary for take-off or landing, **or practicing approaches** or ~~except~~ by permission from the competent authority, a VFR flight shall not be flown*"

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**Form No.**  **of**

**Paragraph Reference  
(Article/Recital etc):**

**4.6 Minimum heights for VFR flight.**

**Comment:**

Currently UK rules require an aircraft "shall not fly within 500ft. of any person, vessel, vehicle or structure" This regulates flying below 500ft agl in a sensible way and we propose it should be adopted

**Reason(s) for Comment:**

Proposed rule does not allow normal flying training practise.

**Proposed Change/Text (where applicable):**

Add new para 4.6 c)

*"within 500ft. of any person, vessel, vehicle or structure"*

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**Organisation Name:** Light Aircraft Association UK

**Form No.**  **of**

**Paragraph Reference  
(Article/Recital etc):**

4.6 Minimum heights for VFR flight.

**Comment:**

Much of balloon training, both initial and recurrent, cannot be conducted without flight below 500ft AGL and for obvious reasons cannot and does not take place at a recognised site or aerodrome.

**Reason(s) for Comment:**

Rule does not allow flight training in balloons

**Proposed Change/Text (where applicable):**

Amend para 4.6 to “*Except when necessary for take-off or landing, **or for balloon flight** or by permission from the competent authority, a VFR flight shall not be flown*”