

Appendix B: Response form

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Feedback

ACP-2020-099 Oban-Mull-Coll

We must regretfully OBJECT to your current proposal, based on insufficient consultation timescales of your revised proposals, the clear absence of timely contact with many important local stakeholders and an apparent absence of knowledge of, or impact assessment upon, existing GA operations in the area.

While we welcome your recent attempts to introduce mitigations in response to comments from other airspace users, these have resulted in a fragmented and confusing ACP in terms of the proposed and revised routings, as well as betraying some serious flaws in your research as to how the TDA may be implemented. We strongly recommend that Skyports withdraws the current ACP and resubmits it, in its entirety, with greater clarity and better developed proposals for its integration with existing airspace users.

In terms of consultation period, we were initially informed of your proposal on 11th January and began our review with local members and other stakeholders. We then received a second version of the proposal on 22nd January and the most recent revision to the proposal on the evening of Thursday 28th January, yet we are requested to meet a response deadline of Sunday 31st January. This is clearly inappropriate. We would be pleased to respond to a definitive proposal with associated time allowed for review.

As you will be aware, there has been significant public criticism regarding your justification for this trial as the carriage of Covid test and other medical samples in association with Argyll and Bute Social Care Partnership. It is noted that ACP-2020-038 at Craignure last year was also justified on similar grounds, with comments that ferry links had been reduced and that Mull was underserved by transport. You have since reported (Item 5 Assessment Meeting Minutes, 16th December 2020) that the previous trial was actually a proof-of-concept, with no post-engagement report or follow-up details on how many flights, what was transferred or weather limitations. A local LAA member who is also a medical practitioner has commented that there are 6 ferries a day each way Oban-Mull and a volunteer car courier service on Mull, so its practitioners are well served in terms of existing transportation.

While our objection is driven by the flight safety implications of your proposal, its potential denial of access to other legitimate airspace users and the lack of appropriate consultation, we strongly recommend that the CAA investigates the veracity of your justifications as part of their review of this proposal. If these justifications were proven to be disingenuous, it is potentially damaging to the credibility of the whole UAS industry.

It is also noted that you intend to progress your trials under the auspices of ACP-2020-055(Lochgilthead), based on its acceptance based on the 'lack of GA response' to the engagement process initiated by you last August. It is clear from our correspondence with the local aviation community that the majority were at the time unaware of this, again pointing to an inappropriate engagement strategy which I am sure you are now keen to resolve.

The Light Aircraft Association represents 7,700 members and oversees on behalf of the CAA, more than 2,600 active light aircraft on LAA-administered Permits to Fly. We speak as the largest powered sport flying body in the UK and also as a member of the GA Alliance, speaking for around 72,000 members of the flying community. We note that they have also responded in some detail and therefore will not repeat the items raised, but fully endorse their comments.

In addition, I have circulated your recent correspondence to the LAA West Scotland Strut, Highlands Strut and to the East of Scotland Strut, our three regional bodies representing members based in Scotland. Despite the claims made in your "Summary of Engagement" statements on p.11 of your proposal, few of these members were aware of the ACP before we contacted them, nor were some significant commercial operators and flying schools. I understand these local pilots, with significant experience of flying conditions in the area, are making their own submissions of which I hope you will take note and forward as part of your CAA submission. As you are aware too, tourism and summer visitors make a significant input to the local economy, many of whom fly in the area in GA aircraft. In particular these make a significant input to the viability of Oban and Glenforsa airfields and their surrounding communities. There is a general feeling that these airspace restrictions will potentially damage this industry.

The LAA considers that the UK airspace's default classification is Class G and there must be equitable access by all, including UAS operations. However we are concerned that this ACP has been prepared with little knowledge of existing GA operations in the area. This is evidenced by the subsequent plethora of changes in the third iteration of the Proposal. We welcome the proposal to move more routes over water and potentially away from Glenforsa airfield's area and schedule of operations. However we request that these included in the main body of the ACP rather in a 'response to comments' section which may not form part of the CAA's scrutiny of the proposal.

We must continue to question your proposed access arrangements, including the assumption of ADS-B carriage by all aircraft operating in the area. As a significant number of existing operators may not be carrying this equipment, this is unacceptable, and we would query the basic need to fully segregate airspace when most operations will be below 400 feet. The key to the successful integration of these activities may be an agreement and close communication with the relevant Flight Information Agencies (Oban and Scottish) to pass the information to locally operating aircraft - as with any other traffic. If necessary, we would be happy to assist in facilitating the appropriate contacts.

As stated earlier, we would be pleased to respond to a new, clearer and definitive proposal with associated time allowed for review. We would also strongly recommend that you present and illustrate your proposed routings and airspace configuration on ICAO-standard aviation charts.

Stephen Slater
CEO, Light Aircraft Association
31st January 2021