

Civil Aviation Authority Call for Evidence  
Department for Transport  
Great Minster House  
33 Horseferry Road  
London  
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Friday 27 January 2023

### **Consultation on the effectiveness and efficiency of the Civil Aviation Authority**

The following is the consultation response on behalf of the All-Party Parliamentary Group on Aviation. This is a cross-party organisation representing MPs from all the major political parties. The following response is on behalf of the APPG and has been compiled following consultation with our working group Chairs, which represent various industry stakeholders.

Whilst we represent a wide range of political views, this response does not represent any official party political stance. For transparency, our Chairman, Robert Courts MP, initiated the review and consultation of the CAA whilst he was Aviation Minister.

We welcome the Government's review of the CAA and recognise that as it celebrated its 50th anniversary last year, it is the right moment to ensure that it remains a world leading regulation organisation supporting the crucial aviation sector. As the Transport Secretary made clear when launching the review, it's a sector that pre-Covid contributed at least £22 billion to GDP and directly provided at least 230,000 jobs (including more than 100,000 jobs in aerospace) across all regions of the country.

However, there is a feeling from those within the Aviation sector that the CAA is not quite shaping up to the modern age, that it could be more agile and that it does not have staff of the right quality and calibre to do what it needs to do. The APPG sets out in this consultation response some areas that we suggest should be considered. These are also reflected in a meeting held by the APPG with the Department of Transport Review Team during January 2023.

#### **Changing the funding model**

The consultation asks the question, *To what extent do you agree or disagree that you would be willing to pay more to increase the standards of customer service and access premium service functions?* Whilst we continue to support the CAA model that ensures

that it continues to be financially independent, we firmly believe that the CAA should consider a premium funding model.

Currently the system does not allow those that urgently require services to receive them in a prompt and efficient way. For instance the Passport Office uses a 1 week Fast Track service that for an additional fee ensures fast turnaround of renewals and changes. This is particularly vital to frequent international travellers in the business community.

By the CAA adopting a similar approach, it would allow a faster service for those that needed it. The premium fee would be able to cover additional staffing ensuring that regular applications do not fall behind in processing times due to additional workload.

### **Avoid unnecessary expense**

The consultation seeks views on whether the CAA offers good value for money. Whilst we appreciate that the CAA is a self-funded organisation, albeit the Government was required to step in during Covid, we still believe the CAA has the opportunity to become more efficient by both reducing bureaucracy and avoiding unnecessary expense.

For instance, the duplication of recertifying engines and components already certified by EASA or FAA is unnecessary. This is currently justified on the basis of UK Sovereignty. However, prior to joining EASA the CAA imposed 60+ UK essential and expensive extra safety requirements (CAP 480 UK Additional Requirements and special conditions). CAP 480 and all special requirements were cancelled when we joined EASA with NO safety loss.

Another example is the sending of up to three CAA Staff to examine approved organisations. Where the record justifies, such inspections could be delegated to qualified entities or carried out every three years rather than every year. Visits should continue only to those not reaching the required standard.

### **Failure to liaise with other Departments**

The APPG has concerns about the effectiveness of communication with other Government departments. Whilst we do recognise the importance of its independence, especially with its regulatory functions, there seems to be a lack of sync with the rest of Government.

This can be especially seen in skills. There were 349,190 apprenticeship starts in 2021/22, up by 8.6 per cent from the previous academic year. Apprenticeships are being strongly supported by the Government as an alternative to University, with funding of £2.7 billion. However, there are currently no approved Approved Training Organisations (ATOs) recognised by the Department for Education as able to accept Apprenticeships.

Airlines cannot therefore send potential pilots as apprentices. This is despite the airline industry making large contributions to the apprenticeship system through the Apprenticeship Levy. By comparison, the RAF offers around 1,500 apprenticeships each year to 16 to 24 year olds.

### **Staff retention and recruitment**

Industry feedback has been that the CAA has struggled with staff shortages and delays in dealing with many aspects of licensing. This has led to Airline transport pilot licence applicants waiting for weeks, if not months for responses. As we have already argued, a premium funding model could allow for the recruitment of more staff.

But due to issues around retention, we also make the case that the CAA should have a root and branch review of pay and conditions. In particular, how this relates to pay in the private sector and a review to see if talent is being lost due to non competitive pay scales.

### **Failure to protect airfields**

The APPG has further concerns regarding the loss of vital regional airfields. Currently the Airfield Advisory Team, an arm of the CAA, provides advice to Government, airfields, and local planning authorities.

However, it is not making any concerted effort to protect valuable airfields around the UK. As shown in Appendix 1, there is a growing number of airfields that are under threat around the UK.

The CAA should always state how important airfields are to the National Transport Infrastructure. Many of these were built using public funds and should be preserved. Once closed these airfields are lost forever as new airfields are not opened due to costs and planning issues.

We are highly concerned about the loss of airfields such as Doncaster Sheffield, which was built as an RAF base with public funds and now is due to be sold off for development.

There are also concerns raised that the CAA is not strongly behind the aviation sector when it comes to the protection of airfields. An example cited is at Eshott Airfield, where, in an attempt to render the Airfield unviable, a farmer erected high bales of straw on the extended runway centreline. This issue was raised in the House of Commons by the Local MP Anne Marie Trevelyan who stated that the CAA refused to assist the owners to enforce safety orders.

The CAA should be offering more support to airfields in cases such as at Eshott. We therefore argue that the current Airfields Advisory Team is an unnecessary expense

and delegation to a suitable independent organisation such as the General Aviation Awareness Council would improve results.

### **Support for the Heritage Sector**

The CAA needs to adopt a more reasonable stance when regulating the heritage sector. Consideration should be given to the Australian system on deregulation, whilst it would not necessarily need to go as far as this, there needs to be more flexibility in the system.

For instance, an APPG member had a replica plane that they wished to place on the UK register. However, the CAA said it couldn't be done on a permit under the LAA as it was too heavy and the only way it would be allowed was if it was put onto a UK Public Transport Certificate of Airworthiness. This would have cost at least £200,000 and there was no guarantee it would have been successful.

Yet this is despite the fact that this was not a safety issue. The plane was allowed to fly to the UK under its foreign registration. Therefore, the CAA failed to provide any oversight and highlights how a review of how the CAA supports the Heritage sector is vital.

### **Space Flight Licensing**

Under its new remit, the CAA is now responsible for space flight licensing. However, the question has been asked whether the CAA has the capacity and the right staff to be able to sufficiently fulfil their duties.

The recent launch failure in Newquay has raised questions about the CAA's sign off on various licences for the launch, and indicates that the CAA needs to expand their workforce in terms of the number of staff, and also skills and training.

### **Illegal Chartering**

The APPG for Aviation is of the opinion that there appears to be a loophole in the industry that allows for illegal chartering. In the industry, it is possible for people/a group to book a session on a small aircraft as an experience of flying.

However, in some cases this results in the aircraft landing at a different location, so in essence the user is being transported from A to B.

The CAA should regulate this, and restrict these sorts of experiences to an A to A experience, meaning that the user ends at the same place they began, and as such this would stop what is essentially illegal chartering in the industry.

## **Bureaucracy and streamlining the system**

The consultation asks the question, *To what extent do you agree or disagree that the CAA makes regulatory decisions and appeals decisions in an efficient and effective manner?* We argue that in particular the licensing system is far too complicated. The aim should be to simplify all regulations and application forms, which are far too often duplicated.

For instance, there is often a need to repeat similar or the same information on multiple forms. Having one master form or a central database with key information, would save large amounts of paperwork for those going through application processes.

We have also had feedback that the CAA often has overstaffed inspections, sometimes there are three or more people in attendance for airfield inspections.

## **Conclusion**

The APPG welcomes the consultation that was launched by the Government looking into the CAA. As we have highlighted, feedback we have received shows there is a clear need for a root and branch review of how the CAA operates.

This review should have clear intention to remove bureaucracy, unnecessary rules and process within the CAA. The sort of good housekeeping that any organisation that is involved in regulation or the public sector should do.

The Aviation APPG would welcome continued input and engagement with the Government in any large-scale reform or review of the CAA.



## Appendix 1



### AERODROMES UPDATE (Updated 31 December 2022)

Aerodrome	Current Status
Bourn	Site earmarked for some 3,500 homes in 2031 Local Plan adopted by South Cambridgeshire District Council on 27 September 2018. The Council approved a planning application for the development on 19 February 2021 subject to the completion of prior conditions.
Cambridge	Marshall Aerospace and Defence Group will be vacating the aerodrome by 2030 and have signed an option to lease land at Cranfield. An outline planning application for the new facility at Cranfield has been submitted to Central Bedfordshire Council and was validated on 2 November 2022. The Cambridge site has been put forward for a major housing development in the First Proposals for the new Greater Cambridge Local Plan issued for public consultation that ended on 13 December 2021.
Chalgrove	Site included in South Oxfordshire District Council 2034 Local Plan adopted on 10 December 2020 for a 3,000-home development with a new runway for Martin-Baker Aircraft (MBA) operations for which development a planning application was submitted by Homes England (HE) the land owner. The application was withdrawn on 21 May 21 pending a review of the plans after the CAA recommended that the proposed development be discontinued as it was incompatible with MBA's current site operations. HE has stated that they will use their CPO powers if negotiations about the development with MBA (their tenant) are unsuccessful.
Chatteris	Anglian Water held a first public consultation ending on 21 December 2022 on a proposal for the aerodrome site and its surroundings to become a new water reservoir.
Coventry	Outline planning applications for an electric vehicle battery Gigafactory on the aerodrome site were fully approved by both Warwick District and Coventry City Councils on 30 March 2022. The applications were referred to the Secretary of State at the Ministry of Levelling Up, Housing and Communities who in a letter dated 26 January 2022, declined to decide them.
Deenethorpe	Central Government has accepted the site for development as a 1,500 home Garden Village. East Northamptonshire Council (now part of the new North Northamptonshire Council) approved the site masterplan on 15 October 2018. A planning application for the development is awaited.
Doncaster Sheffield	The aerodrome has been notified as being without any aviation facilities with its associated airspace reverting to Class G. An application for a Judicial Review and an injunction against the aerodrome's closure was refused on 1 December 2022. An ACP application has been made to permanently delete the aerodrome and associated airspace from relevant documents.
Dunsfold	Planning application for mixed use development with 1,800 homes on site approved by Waverley Borough Council on 14 December 2016 but called in for a Public Inquiry the result of which was Central Government approval for the application on 29 March 2018. Protest groups appealed these decisions in the High Court but the Court rejected these challenges on 5 November 2018. The development has now been granted Government Garden Village status. A Supplementary Planning Document for the development was adopted by the Council on 22 February 2022.
Elvington	York City Council draft Local Plan submitted for Public Examination on 25 May 2018 with public hearings commencing on 10 December 2019 includes a development of up to 3,330 homes occupying the middle section of the runway. Public consultation on major modifications to the Local Plan ended on 7 July 2021 and additional public hearings ended on 22 September 2022.
Fairoaks	Land owner of part of the site gave notices to vacant by February 2022 to some hangar and aerodrome building tenants which action did not affect the operation of the taxiways and runway which are in separate ownership. Public consultation ended on 9 May 2022 on Surrey Heath Borough Council's draft 2038 Local Plan Preferred Options document which states that the aerodrome is earmarked as a locally important employment site and notes its established use as an aerodrome.
Halfpenny Green (Wolverhampton Business Airport)	In September 2018 South Staffordshire Council approved a Site Allocation Document expanding on the previously adopted Core Strategy within the Local Plan which states that the aerodrome is allocated and protected for employment purposes. A planning application for the construction by MCR Property Group, the site owner, of 112 homes on south-west corner of site and aerodrome improvements, including construction of 3 new hangars, was refused on 28 October 2022.





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(Updated 31 December 2022)

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Long Marston	Aerodrome is designated in Stratford-on-Avon District Council Local Plan adopted Core Strategy for housing and has Government Garden Village approval for which a planning application has been submitted. Developer is Cala Homes in conjunction with site owner.
Manston	On 9 July 2020, the Secretary of State (SoS) made a Development Consent Order (DCO) for the aerodrome as a Nationally Significant Infrastructure Project which Order was quashed on 15 February 2021 as the result of a Judicial Review. After a public consultation and the issue of independent reports on the need for the development reviewing the decision to grant the Order, an amended DCO was made by the SoS on 18 August 2022. Opponents of the development have applied to the High Court for a Judicial Review of the amended DCO. On 9 July 2020 Thanet District Council adopted its 2031 Local Plan that safeguards the aerodrome.
<b>MoD Sites</b>	The following MoD aerodrome sites are planned for disposal in the years indicated:
Abingdon Aerodrome 2030	Site earmarked for Garden Village style development with 1,200 homes in Vale of White Horse District Council 2031 Local Plan Part 2 adopted by the Council on 9 October 2019. Under the Plan, the development area is restricted to the south of the old runway 08/26.
Brawdy 2028	Cawdor Barracks. Defence Infrastructure Organisation (DIO) have submitted site for mixed use development for the review of 2033 Local Development Plan 2 by Pembrokeshire Council but this is not included in the draft Plan issued for public consultation ending on 18 March 2020.
Colerne 2025	Aerodrome was originally expected to be sold in 2018. Local business interest in maintaining the aerodrome for aviation purposes.
Dishforth 2031	Aerodrome site being disposed of but not included for development in the 2035 Harrogate Borough Council Local Plan adopted by the Council on 4 March 2020 but site is expected to be considered during first five-year review of the adopted Plan.
Halton Aerodrome 2027	The DIO future vision document for RAF Halton & the Aylesbury Vale District Council (now part of the new Buckinghamshire Council) 2033 Local Plan adopted by the Council on 15 September 2021, exclude development of the aerodrome site.
Henlow 2026	Future of the site being progressed by a partnership between the DIO and HE. The Central Bedfordshire Council 2035 Local Plan adopted by the Council on 22 July 2021 expects the site to be redeveloped for alternative, non-military uses with due regard for the on-site heritage assets including the airfield.
North Luffenham 2026	Rutland County Council have withdrawn the draft Local Plan which included a 2,215-home community for the site, from public examination and are drafting a new Plan. The community development had been accepted under the Government Garden Village programme.
Scampton 2023	The Red Arrows display team relocated to RAF Waddington in October 2022. West Lindsey District Council have submitted an expression of interest in acquiring the site. The draft Central Lincolnshire Joint 2040 Local Plan submitted for public examination on 8 July 2022 calls for a masterplan to be developed for the site preserving and enhancing its heritage assets. Public hearings on the draft plan started on 15 November 2022.
Spitalgate 2028	Prince William of Gloucester Barracks. Future of the site being progressed by a partnership between the DIO and HE. Site earmarked for a Garden Village style settlement in South Kesteven District Council 2036 Local Plan adopted by the Council on 30 January 2020.
Swanton Morley 2029	Robertson Barracks. There is no reference to the closure of the Barracks in the definitive Breckland Council 2036 Local Plan adopted by the Council on 28 November 2019.
Tern Hill 2029	Clive Barracks. Shropshire Council submitted its draft 2038 Local Plan for public examination on 3 September 2021 which includes a 750-home mixed use development of the Barracks site leaving the airfield intact. Further public hearings on the draft Plan are scheduled for 17/18 January 2023.
Topcliffe 2031	Alanbrooke Barracks. Due to close under the Future Soldier army restructuring programme.
Wethersfield 2025	Future of the site being progressed by a partnership between the DIO and HE with new prisons and housing being considered.





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<b>Aerodrome</b>	<b>Current Status</b>
<b>MoD Sites</b>	
Wyton Aerodrome 2022	DIO in partnership with property developer Crest Nicholson has proposed a 4,500-home development on the site which is not included in the adopted 2036 Huntingdonshire District Council Local Plan.
North Denes	The aerodrome (Yarmouth Heliport) with two grass runways is for sale having been disused since 2015 on the cessation of North Sea helicopter operations.
Nottingham City (Tollerton)	With the support of the land owner, site and adjoining land earmarked for up to 4,000 homes in Local Plan adopted by Rushcliffe Borough Council on 8 October 2019. A planning application for development proposals to the north and west of the aerodrome has been submitted.
Panshanger	HE has bought the aerodrome site from Mariposa Investments. A public consultation by Welwyn Hatfield Borough Council ended on 1 May 2020 into providing additional housing sites for the Local Plan which schemes preclude a realigned grass runway to the north of previous runway 11/29 proposed in the current draft Local Plan. Latest public hearings on the Local Plan ended on 17 March 2021. An outline planning application to re-open the aerodrome has been submitted.
Peterborough / Sibson	Huntingdonshire District Council submitted an unsuccessful bid for a 2,500 home Garden Village on site. The Council subsequently withdrew their support for the proposal but the site is still listed in the Council's Housing and Economic Land Availability Assessment.
Plymouth	FlyPlymouth, a local social enterprise aerodrome support group, plans to reopen the aerodrome and start regional airline services. Sutton Harbour Group, the site lease holder, have proposed a mixed-use development although the Plymouth City / South-West Devon Joint Local Plan adopted in March 2019 retains the site for aviation use at least until the first five-year review of the Plan.
Popham	Site land owner has submitted the site for a 3,000-home development in the Strategic Housing and Economic Land Availability Assessment (SHELAA) and the site is provisionally shortlisted for development as part of the Local Plan review by Basingstoke and Deane Borough Council.
Redhill	Tandridge District Council public consultation on four potential Garden Village sites including Redhill ended on 9 October 2017. The draft 2033 Local Plan submitted for Public Examination on 18 January 2019 with hearings ending on 28 November 2019 ruled out the site for a Garden Village and allocated it protected status as an Important Employment Site. Part of the site is within the boundary of Reigate and Banstead Borough Council whose adopted Local Plan makes no mention of the aerodrome.
Retford / Gamston	Full planning permission granted by Bassetlaw District Council on 25 October 2021 to convert hangars 6 to 11 into a vehicle testing facility and for dual use of the runway for autonomous vehicle testing and aircraft.
Rougham	West Suffolk Council's Local Plan review preferred options document public consultation ended on 26 July 2022 and proposes the airfield site for employment led development with some housing.
Thurrock	Thurrock Council have received and validated a planning application for development of 750 houses, a medical centre and employment units on aerodrome site.
Wellesbourne Mountford	Stratford-on-Avon District Council Core Strategy stated policy is to "Retain and support the enhancement of the established flying functions and aviation related facilities at Wellesbourne Airfield". The Council rescinded the owner's permitted development rights and initiated negotiations for an agreed purchase of the site whilst also taking CPO action to acquire the site. Under a MoU dated 30 August 2019, which expired in January 2022, between the Council and the site owners, the CPO action was suspended to allow the owners to propose limited development of the site whilst retaining the aviation facilities. On 25 August 2022 the parties signed a new 2-year MoU which continues suspension of the CPO action whilst plans are submitted for limited development of the site retaining a 917m runway and enhancing the current aviation facilities. An ACP application has been made for the construction of a realigned runway 01/19 west of the current 18/36 runway.

Note: The previous entries for Fenland, Langar and Wycombe Air Park have been deleted as these aerodromes are not currently under threat of closure.