

House of Commons, London, SW1A 0AA

Chair: The Rt Hon Grant Shapps MP | President: Sir Roger Gale MP | Ambassador: Carol Vorderman, MBE

Baroness Sugg CBE
Department for Transport
Great Minister House
33 Horseferry Road
London, SW1P 4DR

27 February 2019

Dear Liz,

The Air Navigation (Amendment) Order 2019

As you are aware, the All-Party Group on General Aviation has taken an even closer interest in the progress of drone regulation since the first drone interference at Gatwick Airport in December 2018. Shortly after the incident, we engaged a dedicated panel of drone experts to advise us on the issues surrounding unmanned aircraft within which we include model aircraft and UAS systems.

Broadly, as a group we welcome the provisions of the latest Statutory Instrument (SI 2019 No.261) amending the Air Navigation Order to introduce enhanced regulations which apply to drones. We especially support the education initiatives that were announced, and we hope that these will complement the good work already being conducted by drone organisations.

However, we do have some important concerns with regard to how the model flying community fits in with the new regulations. As we see it, the amendment unfairly disaffects model flying clubs who have operated safely for almost 100 years.

In its response to the 'Future of Drones in the UK' consultation, published in January, the Department for Transport stated "The Government recognises the long-standing safety and education cultures which model aircraft flying associations promote and has therefore been examining ways in which the impacts of regulation can be minimised."¹ Yet, model flying clubs who previously enjoyed concessions/exemptions appear to have been offered no ongoing concessions in the new regulations.

Long established model flying clubs have been allowed very little time to make the required changes and will face difficulty in implementing the regulations in the short time frame provided. Clubs operate from fixed locations, sometimes close to or even within the boundaries of aerodromes. These clubs have now been forced to seek new permissions. Some operators are reluctant to issue these permissions due to a perceived increase in their liability.

¹ Government response to future of drones in the UK consultation, pg 15, Para 2.23 - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/771673/future-of-drones-in-uk-consultation-response-web.pdf

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Model flying is fundamentally different to drone operations in several respects. Model aircraft are unable to operate beyond visual range of the pilot. The aerodynamics and control systems of model aircraft means that they require a greater level of pilot skill to operate. Consequently, pilots must be trained to a higher level than hobby drone flyers. Above all, there is an established community and model aircraft are rarely operated outside of a club environment. Clubs operate within the existing ANO and established community codes of practice and police themselves. In addition, their members all carry extensive liability insurance.

As it stands, the Government's policy is out of step with the approach taken by EASA in their basic regulation. The APPG-GA therefore believes more explicit provisions need to be made to reduce the impact on tried and tested model flying clubs.

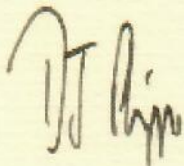
Given the events at Gatwick, it is clear that greater regulation is necessary. However, we feel urgent action must be taken to provide a proportionate solution for model flying groups.

We would be grateful for any clarification you can provide on this matter.

Yours ever,



The Rt Hon Grant Shapps MP
Chair of the All-Party Parliamentary Group on General Aviation



David Phipps
Chief Executive of the British Model Flying Association

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