

The PPL Review

A review of private and recreational flight training in the UK

Available information, costs, regulatory requirements and associated hurdles

CAP 1216



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Foreword

As part of the General Aviation Red Tape Challenge, the CAA employed Edward Bellamy, the author of this report, to conduct some research into the process an individual is required to undertake to obtain a Private Pilot's Licence (PPL) or other similar qualification for recreational or private flying in the UK.

Particular focus was given to:

- Availability of information, including the ease of understanding
- Costs of training, both within training schools and those imposed by the regulator
- Regulatory requirements
- Any other associated hurdles

The work commenced in May 2014 and these findings are based on engaging with a variety of areas of the CAA, various instructors and, through email and the *Flyer* forum, the views of qualified and student pilots.

While issues relating to the regulation and administrative procedures of flight training establishments were highly relevant in this context, the exercise was intended to be primarily from the point of view of the prospective PPL rather than flight schools. Some issues considered, particularly in the area of cost, were strategic in nature and considered to impact on the overall health of the flight training industry as opposed to directly impacting on the process of obtaining a private or recreational flying qualification.

This report contains findings, some external feedback and recommendations as a result of the work. In some subject areas general comment has been made without an explicit recommendation – these are typically areas in which further discussion and engagement between the CAA and stakeholders would be helpful in the future.

Key findings

Broadly, the process of learning to fly was not found to be overly burdened by 'unnecessary bureaucracy' or 'disproportionate regulation' that is directly imposed by the CAA or EASA, although the Approved Training Organisation (ATO) approval and conversion process for establishments offering EASA licences has been a frequent complaint in the current period. It is not clear to what extent this has impacted on the individual who wishes to learn to fly; for the most part they will not likely notice any significant difference in the training environment or process at establishments that are currently in place. However, the long-term impact on the market for flight training could be negative in terms of cost and choice as the approval process may represent a barrier to entry in the market for flight training.

The current process is essentially 'fit for purpose'. From the point of view of the student, the quality of the training experience is primarily defined by the interaction between their time and money, the quality of the instruction and the impact of the weather. The quality of the training establishment or instructor used is a very important determining factor for the experience and it is difficult for the CAA to impact on that beyond the regulatory oversight it already conducts, which, as will be discussed, is of dubious necessity already. Consequently it is considered that the CAA's best approach would be to make prospective students aware of the issues to be considered and what questions to ask when selecting a school in order that they can make informed choices about their training.

The issue of the syllabus, both practical and theoretical, continues to be under consideration at the CAA. This report does conclude that the nature and role of theoretical knowledge, mostly for EASA regulated training, should be further reviewed to ensure that it plays an effective role in ensuring pilots have the most appropriate knowledge for the post training environment. Theoretical knowledge and the associated exams featured extensively in the external feedback and therefore this area deserves special attention in the future.

The area of cost was also investigated; findings conclude that while CAA fees are a frequent complaint, in the context of private flight training itself, the direct charges on a prospective licence holder are not excessive. The main components of an hour's flight training continue to be fuel, maintenance and the fixed costs associated with running a training establishment.

Addressing the following issues would likely improve the long term viability and health of flight training:

- Costs and regulations relating to initial airworthiness of aircraft – improvements in this area could encourage the development of better, cheaper and more efficient models
- Costs and regulations relating to continuing airworthiness and maintenance – these impact on the cost of aircraft ownership and therefore the cost of maintaining a fleet on training organisations

Recommendations

Recommendation 1

The CAA should consider some of the following options relating to information on learning to fly:

Option 1: Do nothing, leave information as it is and rely on flying schools and industry organisations and publications to produce guidance as the industry sees fit.

Option 2: Coordinate and rationalise the CAA's 'learning to fly' guidance, include links to relevant organisations such as BGA, BMAA etc and make the available guidance easier to understand.

Option 3: Comprehensively review the information provided by the CAA and produce a new set of guidance which covers the process and the different training options and strategies available.

In the short it is strongly recommended that option 2 is adopted and option 3 in the longer term.

Recommendation 2

In the context of future EASA consideration for GA regulation the CAA should continue to support a proportionate solution to organisational approvals for private flight training and support the removal of the requirement for ATO status in its current format.

Recommendation 3

The CAA should review the interpretation of competent authority oversight requirements which results in a UK prohibition on international training flights without prior agreements covering competent authority oversight. Practice in Europe should be taken into account.

Recommendation 4

The CAA should continue to influence and support EASA towards developing certification processes for LSA and CS-23 aircraft that reduce cost and disproportionate requirements in bringing newer and more efficient models to the market.

Recommendation 5

The CAA should seek international agreements relating to the mutual recognition of standards for the initial airworthiness of Annex II aeroplanes and microlights.

Recommendation 6

For licensing purposes, consider all conventional three axis control system aircraft above a certain weight (lower than the current threshold) as being in a single class, therefore allowing the PPL or LAPL to be gained at lower cost on aircraft that can currently only be used towards NPPL(M) training.

Recommendation 7

The CAA should review the effectiveness of requiring permission for flight training in non-EASA registered

aircraft as an oversight mechanism and consider allowing ATOs to be accountable for the decision to use non-EASA registered aircraft, in the same way they are for any other aircraft they may wish to use.

Recommendation 8

While this process has provided limited opportunity to investigate the quality instruction at the private level, it is an important aspect of the learning experience and the CAA should ensure that instructor training remains of a high standard and reflects the latest understanding of instructional techniques.

Recommendation 9

The CAA should support recent proposals at EASA that could allow examiners to have conducted some of the applicant's training for an EASA licence.

Recommendation 10

The CAA should review the fees and processes that examiners are subject to for initial and continuing certification of their privileges.

Recommendation 11

In future an in-depth review of the should be undertaken, covering role of theoretical knowledge in learning to fly, how effective it is in the overall process and how effective the current system of written exams is in the context of preparing PPLs for the post training environment.

Recommendation 12

The written exams and the relevant content should be constructed in such a way that encourages theoretical knowledge material to follow a more logical and contextual structure so that they will be of greater use for future reference, especially in the case of air law, flight planning and operational procedures.

Recommendation 13

The CAA should review the 'test notification' procedure to determine whether it is an effective oversight mechanism and whether or not such a mechanism is required. If notification 'in arrears' is satisfactory then simply adopt that as the standard mechanism or remove the requirement completely.

Recommendation 14

The CAA should review the licensing application forms to ensure that they only ask for relevant information and that the guidance for these forms is clearer and easier to understand.

Recommendation 15

The system that processes a licence application should automatically check all the relevant parameters needed to verify that a licence or rating can be granted rather than the use of manual checking of various systems. This should also allow applicants to track their applications online.

Recommendation 16

Temporary certificates which allow the applicant to exercise the privileges of a licence on successful completion of a skills test should be issued.

Recommendation 17

The CAA should continue to undertake investigations into the appropriate level of medical requirements for private flying.

Recommendation 18

While it is difficult for the CAA to compete with other European competent authorities that have different levels of public funding, it should consider reducing fees in areas (such as flight crew licensing) in which individuals have a choice of competent authority to attract more non-UK applicants.

Recommendation 19

In the context of recommendation 2 the CAA should review where the more labour intensive, and therefore costly, areas of the approval process are and mitigate them appropriately so that administrative complexity does not become a 'barrier to entry' in the flight training market.

Recommendation 20

The CAA should continue to work with EASA towards a proportionate continuing airworthiness regime that reduces the cost of maintaining aircraft.

Recommendation 21

The Government should implement the recommendations of the General Aviation Challenge Panel Final Report and continue to support the UK's flight training industry.