

General Aviation Pilot Licensing Review Phase 2: Detailed proposals – Helicopters

A consultation

CAP 2974E



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Please reply to this consultation via our website: <https://consultations.caa.co.uk> by **22nd May 2024**.

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Summary

Introduction and how to respond

1. In October 2022 we published [CAP 2335](#) (General Aviation Pilot Licensing & Training Simplification – Phase 1: Strategic Direction), as part of a 3-phase programme to simplify pilot licensing and training for the UK's General Aviation (GA) community.
2. The subsequent GA community response ([CAP 2532](#)) showed strong support in several key areas for updating our current legislation with regards to licensing and training.
3. This consultation (phase 2) will explore these key areas in more detail, to ensure that we are working towards the goals of the community, whilst maintaining safety and legislative compliance where appropriate.
4. The consultation closes on **22nd May 2024**. Please submit responses via our website: <https://consultations.caa.co.uk>.
5. The outcome of the consultation will help finalise the proposals for the simplification of licencing and training. The final proposals and legal drafting will be developed with the Department for Transport and presented for legislative amendment in Spring 2025.

Specific Proposals

Single ICAO compliant licence

- Consolidate current licences that offer similar privileges in favour of a single ICAO compliant licence.
- Consider allowing the use of mobile devices with flight planning and monitoring software during the navigation flight exercises.
- Allow the use of Global Navigation Satellite System (GNSS) as an alternative to Very High Frequency Omnidirectional Range (VOR)/Non-directional Beacon (NDB) when conducting Ex 25c of the syllabus.

Sub-ICAO licence

- Consider the consolidation of the current licences that offer similar privileges in favour of a single sub-ICAO licence.

Theoretical Knowledge

- Maintain the content and number of questions of the theoretical knowledge but consider combining topics to reduce the number of exams being sat.
- Consider changes to the theoretical knowledge examinations validity periods.
- Consider allowing the use of mobile devices with flight planning and monitoring software during the theoretical knowledge training and examinations.

Flight Instructor Certificate

- Consider a review of the prerequisite theoretical knowledge and teaching and learning as well as the course requirements for the Flight Instructor Certificate (Helicopters) (FI(H)).

Chapter 1

Background and scope

Background

- 1.1 The CAA is now continuing with the project to simplify General Aviation (GA) flight crew licensing and training, and this paper consults on detailed proposals for helicopters. Similar consultations are being undertaken for aeroplanes, balloons and airships, sailplanes and gyroplanes.
- 1.2 We undertook a first strategic phase of this project looking at the broad licensing architecture for the different aircraft categories, culminating in the public consultation [CAP 2335](#) in October to December 2022. That consultation elicited 1,246 responses, and we published [Consultation Response Document CAP 2532](#) setting out its detailed findings.¹
- 1.3 Following the closure of that consultation, we started Phase 2 of the project in May 2023 to develop more detailed proposals across the different aircraft categories in the scope of this project. In keeping with our collaborative approach towards policy development and rulemaking, we reconvened the working group that assisted with the first phase of the project, enlarged its membership, and split by aircraft category to provide a focused analysis: aeroplanes, sailplanes, balloons and airships, helicopters and gyroplanes.

Scope

- 1.4 This consultation proposes changes to private pilot licences and associated ratings and certificates to act as pilot in command of helicopters as defined by UK Part-FCL and Schedule 1 of the Air Navigation Order 2016 (The Order) as 'means a heavier-than-air aircraft supported in flight chiefly by the reactions of the air on one or more power-driven rotors on substantially vertical axes.
- 1.5 This project will not cover the following areas:
 - a) Commercial operations other than private pilot instruction. Pilot licences allowing commercial operations in aeroplanes or helicopters, including public transport and commercial air transport, as well as integrated flight training with the express purpose of training from no previous experience to air transport licences are all outside the scope of this project.

¹ For more information on this project, see our dedicated project microsite on the CAA website:

<https://www.caa.co.uk/general-aviation/pilot-licences/licensing-training-simplification/>

- b) Private operations in complex aeroplanes and helicopters. Although operations in, for example, corporate aviation are technically part of the international general aviation definition, the specific characteristics and needs of the markets in which those aircraft operate mean that we regulate them separately.
- c) Ratings and rating exemptions for historic/ex-military aircraft, as well as display pilot qualifications.
- d) Unregulated activities to operate non-Part-21 gliders such as unregulated sailplanes and Self-Propelled Hang Gliders (also known as 'paramotors' or 'powered paragliders').
- e) Finally, Medical Certification and the Pilot Medical Declaration, although linked to licensing are not considered in this review.

1.6 Note it is unlikely that the assimilated EU law (previously known as retained EU law) and the Air Navigation Order 2016 (ANO 2016) will be consolidated during the timeline of this project. Whilst we will endeavour to remove inconsistencies between the two legal frameworks, Part 21 aircraft will remain regulated under the assimilated EU law and non-Part 21 aircraft under the ANO 2016.

Market Size

1.7 The UK GA helicopter community and fleet includes (data accurate from November 2023):

- Less than 100 LAPL(H) and NPPL(H) holders
- 3167 holders of UK PPL(H) issued in accordance with the ANO 2016.
- 3559 Part-FCL PPL(H) holders
- 72 non-Part 21 helicopters, 33 of which are home-built helicopter types.
- 807 Part 21 helicopters, of which 405 are single engine piston helicopters.
- 18 Approved Training Organisations (ATO) offering theoretical and flight training towards a private helicopter licence.
- 46 Declared Training Organisations (DTO) offering theoretical and flight training towards a private helicopter licence.

Considerations

1.8 We have not been able to change the definition of Part 21 and non-Part 21 aircraft, as defined in the UK Basic Regulation.

1.9 We are not proposing any changes to Part 21 Operational Suitability Data (OSD) or previously published Operational Evaluation Boards (OEB) with respects to identified training requirements for flight crew when operating a specific aircraft.

About you

In accordance with our public law obligations, we welcome and will equally weight all submissions to this consultation. However, to help us better understand the results of any technical questions, we would like to know if you participate in aviation and in what capacity (select all that apply to you):

- Helicopter flight crew licence holder or student
- Helicopter instructor or examiner
- Other GA aircraft flight crew licence holder or student eg PPL(A), PPL(BA), NPPL(A) etc
- Other aviation flight crew licence holder eg CPL(H), ATPL, military
- Other aviation licence holder, eg other aircrew, air traffic controller, aircraft maintenance etc
- Aircraft operator or training organisation management
- GA-related industry, eg insurance, manufacturer, distributor. Please specify:

- Position within a government, regulatory or related body
- Position within an aviation representative or professional body
- Frequent passenger in a GA aircraft
- None of the above, but I consider myself affected by GA licensing; eg local resident, etc
- None of the above: I do not participate in this part of aviation, but have an interest in these issues

Is your response a formal submission on behalf of an organisation?

- No
- Yes: organisation: _____

Please note that we would only expect one submission to be made per organisation.

Chapter 2

ICAO PPL(H)

Flight training

2.1 In the first consultation, we made the following statement:

Phase 1 Consultation Outcome – CAA Decision no.3

We will proceed in Phase 2 with the reassessment of the UK Part-FCL PPL(A) and PPL(H) requirements that go beyond those set out in ICAO SARPs Annex 1 Personnel Licensing, with respect to safety standards.

2.2 After further review, we have determined that the existing Part-FCL requirements for the PPL(H) are similar to those of ICAO Annex 1, and we do not believe any substantial changes are required to the qualifying experience or flight training syllabus for helicopters.

2.3 The current syllabus has been developed over the last two decades and many evolutions have been in response to safety recommendations from the Air Accidents Investigation Branch (AAIB)

2.4 We developed an AltMoC, published in [CAP 1300](#), allowing the use of GNSS as an alternative to VOR/NDB when conducting Ex 25c of the Part-FCL PPL(H) syllabus. We propose to incorporate this in AMC 2 FCL.210 PPL(H) – Training Course.

2.5 We developed an AltMoC, published in CAP 1300, allowing the use of GNSS in place of VOR/NDB when conducting Ex 25c of the Part-FCL PPL(H) syllabus. We propose to incorporate this in AMC 2 FCL.210 PPL(H) – Training Course.

Type ratings

2.6 We considered simplifying the format of type ratings for helicopters. But following internal and external discussions, it was identified that given the requirements in Part 21 operational evaluation boards (OEB) or operational suitability data (OSD) reports, which establish the flight training requirements for type ratings, this would prove complex and may not support an acceptable level of safety, so we are not proposing to make any changes in this area.

Combined licence document

2.7 The Phase 1 consultation proposed discontinuing the issue of the UK PPL under the [Air Navigation Order 2016](#) (ANO 2016). Whilst most licences are issued under UK Part-FCL, there is also a limited number of UK licences issued under

the ANO 2016, mostly to existing Part-FCL licence holders. A common reason for this is the endorsement of a type rating for a non-Part 21 aircraft.

- 2.8 Consolidation between the Air Navigation Order 2016 and the assimilated EU law is unlikely to take place within the timeline of this project, so we have developed the concept of a combined Part-FCL and ANO licence document.
- 2.9 The combined licence document would be based on the Part-FCL format, but with a section issued under the ANO, which would allow the endorsement of non-Part 21 type ratings. If possible, we could therefore discontinue the issue of the UK PPL(H) under ANO 2016 as a standalone licence document.
- 2.10 Existing ANO licence holders would be unaffected; we are not proposing to remove the licence for existing holders. Holders of UK licences may apply for a Part-FCL equivalent, subject to having a current rating and medical – on application we would issue a licence in the new combined format.

Question

Do you agree with our proposal to discontinue issuing new UK PPL licences under the Air Navigation Order?

- Yes
- No
- Familiar with the issues but am undecided either way
- No view/don't know

Chapter 3

Sub-ICAO Helicopter licence

Flight Training

- 3.1 The first consultation proposed a single sub-ICAO licence for helicopters, which would replace the existing NPPL(H) and LAPL(H). This proposal received support from consultees. We committed to:

Phase 1 Consultation Outcome – CAA Decision no.5

We will proceed in Phase 2 with the details around consolidating the existing LAPL(H) and NPPL(H) in favour of a single sub-ICAO private pilot helicopter licence, tentatively entitled the Private Pilot Licence (Light)(Helicopters), and then consolidating the syllabus with the ICAO PPL(H).

Combined licence document

- 3.2 As stated in Chapter 2, consolidation between the Air Navigation Order 2016 and the assimilated EU law is unlikely to take place within the timeline of this project. The NPPL(H) resides within the ANO 2016 and the LAPL(H) within Part-FCL.
- 3.3 To create a single sub-ICAO licence, we would use the same combined licence document concept as described in Chapter 2. This would likely mean ceasing to issue the NPPL(H) as a standalone licence, and when required, issuing a sub-ICAO licence under Part-FCL, but with a section for non-Part 21 type ratings.
- 3.4 Existing holders of the LAPL(H) and NPPL(H) would be able to continue to exercise the privileges of the licence they hold.

Question

Do you agree with our proposal to issue a combined licence document for the sub-ICAO licence?

Yes

No

Undecided

No view/don't know

Syllabus

- 3.5 The existing LAPL(H) syllabus is very similar to that of the PPL(H). The theoretical knowledge requirements are also the same. Whilst we are committed to retaining a sub-ICAO helicopter licence, it may not make sense to retain two very similar syllabi.

- 3.6 Since introduction in 2012, the CAA has issued a very small number of LAPL(H) and feedback suggests course completion times are similar to that of the PPL(H).
- 3.7 An alternative approach would be to only use the PPL(H) syllabus but issue a LAPL(H) if the applicant could only meet the LAPL medical standard.

Question

Do you believe the sub-ICAO helicopter licence should have the same or a different syllabus from the PPL(H)?

- Same as the PPL(H)
- Separate sub-ICAO syllabus
- Undecided
- No view/don't know

Do you have any comments?

Chapter 4

Theoretical knowledge

Number of exams

- 4.1 Currently there are nine separate exams for the PPL(H), one for each subject identified in ICAO Annex 1 and [FCL.215](#). These exams consist of five common papers and four that are specific to the aircraft category.
- 4.2 It is not mandated in regulation that each subject has a separate exam, and some EASA states combine subjects. The working group identified arguments for both approaches.
- 4.3 Some members advocated that having a higher number of specific exams made revision easier and that candidates can already combine exams if they so wished. Having multiple exams may also support the parallel integration of theoretical knowledge and flight training.
- 4.4 Others in the group believed that multiple exams made the theoretical knowledge course seem more onerous and that reduced exams would provide more motivation for candidates.
- 4.5 We propose to keep the overall number of exam questions for the PPL(H) to 120, as per the existing AMC material for the PPL. However, we are open minded as to the number of individual papers the questions should be distributed within.
- 4.6 The working group identified options that included reducing the number of exams to either seven or two. With seven exams, Air Law would be merged with Operational Procedures and elements of Flight Performance and Planning would be merged with Navigation and Aircraft General Knowledge.
- 4.7 In the case of two exams, all the aircraft category specific subjects would be merged into one paper and the common subjects into another.
- 4.8 We appreciate that this may end the widespread practice of training organisations requiring student pilots to pass the air law examination before their first solo flight, and the navigation, flight performance and planning examinations before their first solo cross-country flight.

Question

Which approach would you support to the theoretical knowledge exams?

- Combine exams into seven
- Combine exams into two
- No change to existing requirements
- Undecided
- No view/don't know

Do you have any comments?

Use of flight planning tools

- 4.9 Many licence holders take advantage of mobile devices for help with navigation and flight planning. The use of these mobile devices with associated flight planning and monitoring software, for example a tablet device and SkyDemon, has been a major development and is central to efforts to reduce airspace infringements. These systems can also be used with different electronic conspicuity devices to help with spotting other aircraft and mitigate against the risk of loss of separation or mid-air collision.
- 4.10 The syllabus currently being used supports the traditional navigation principles of deduced reckoning and map reading. Flight planning and track monitoring is calculated by using an analogue flight computer, for example Pooleys CRP 1.
- 4.11 We believe there are benefits for student pilots learning to use such flight planning software as part of the course. Not to replace the basic principles of navigation and flight planning but to improve the use of these systems and to gain improvements in pilots' airspace and situational awareness.
- 4.12 We are proposing to encourage the use of these devices as part of the theoretical knowledge training. We are not proposing, at this time, to allow these systems to be used in the examinations for navigation and flight planning and performance.

Question

Do you agree that we should encourage the use of mobile devices with flight planning and monitoring software in the Navigation and Flight Performance and Planning training?

Yes

No

Undecided

No view/don't know

- 4.13 We are also proposing to encourage the use of mobile devices with flight planning and monitoring software during flight training, specifically the navigation exercises.
- 4.14 Student pilots will still need to know how to plan and monitor a flight using those basic principles and systems for the Skill Test.

Question

Do you agree that we should encourage the use of mobile devices with flight planning and monitoring software during the Navigation exercises?

Yes

No

Undecided

No view/don't know

Validity periods

- 4.15 We are proposing to extend certain validity periods, we have had to balance this with concerns about skill and knowledge fade, if we were to remove the validity periods completely.
- 4.16 We are considering changing the 18-month period within which all examinations must be passed for the issue of the licence, to a rolling validity period. This means if an examination goes outside of the 18-month period, the candidate does not have to retake all the examinations again – only the examinations that have fallen outside of the 18-month period.

Question

Do you agree with amending the validity period of the examinations to change the 18-month period in which all examinations must be passed within a certain period to a rolling validity period?

Yes

No

Undecided

No view/don't know

- 4.17 We are also considering amending the validity period for successfully passed theoretical knowledge examinations to give applicants more time to apply for a licence. It is proposed that the validity period will be extended from 24 months to 36 months.

Question

Do you agree that we should amend the validity period of theoretical knowledge examinations from the current 24 months to 36 months?

Yes

No

Undecided

No view/don't know

- 4.18 With the data we are now collecting in the eExam system, we have seen a slight increase in the number of candidates who have failed to pass an examination within four attempts.
- 4.19 If an examination candidate fails to pass an examination within four attempts, they forfeit any examination passes they have already and have to start again, after a period of theoretical knowledge training.
- 4.20 Many of these student pilots have not continued with their training for a pilot's licence.
- 4.21 We would like to better understand why these student pilots are ceasing their training and if the requirement to retake all of the examinations again was a factor in them stopping their course.
- 4.23 We would also like to see what alternative options there are to requiring all of the examinations to be retaken.

Question

If a student fails any one exam four times, is the requirement to retake all of the examinations again a factor in a student pilot stopping their course?

Yes

No

Undecided

No view/don't know

Question

Do you have any suggestions how we could replace the requirement to retake all the examinations where a candidate has failed to pass an examination within four attempts?

Suggestions: _____

Chapter 5

Other issues

Flight Instructor theoretical knowledge

- 5.1 Applicants for a Flight Instructor (FI) Certificate who wish to teach for the PPL(H) are required to hold a CPL or have passed the CPL theoretical knowledge examinations. This is an ICAO Annex 1 requirement which we will maintain.
- 5.2 The FI course also includes theoretical knowledge instruction covering teaching and learning techniques, understanding of the syllabus and aviation technical knowledge.
- 5.3 Concerns have been raised to the CAA about the competence, depth of and application of appropriate theoretical knowledge by some flight instructors. We are considering a review of the prerequisite theoretical knowledge and the course teaching and learning and theoretical knowledge instruction requirements for the FI.
- 5.4 We need to ensure that the prerequisite and course training requirements prepare an FI to be competent and to be able to deliver quality flight and theoretical knowledge training to student pilots.

Question

We would appreciate your comments and suggestions on how we can improve the prerequisite theoretical knowledge and the course teaching and learning and theoretical knowledge instruction requirements for the FI.

Comments: _____

Other comments

- 5.5 We are also open to comments regarding helicopter flight crew licensing issues not mentioned in this consultation.

Question

Do you have any further comments or issues regarding helicopter flight crew licensing that you wish to raise?

Comments: _____

Abbreviations

ANO	Air Navigation Order 2016
AOC	Air Operator's Certificate
ATO	Approved Training Organisation
DfT	Department for Transport
DTO	Declared Training Organisation
EASA	European Aviation Safety Agency
FCL	Flight Crew Licensing
GA	General Aviation
ICAO	International Civil Aviation Organisation
IR	Instrument Rating
LAPL	Light Aircraft Pilot Licence
MEP	Multi-Engine Piston
MET	Multi-Engine Turboprop
NDB	Non-directional beacon
NPPL	National Private Pilot Licence
PPL	Private Pilot Licence
SARPs	Standards & Recommended Practices (ICAO Annexes)
SEP	Single Engine Piston
VFR	Visual Flight Rules
VOR	Very High Frequency Omnidirectional Range Station