

BRITISH HANG GLIDING AND PARAGLIDING ASSOCIATION
RESPONSE TO TAG Farnborough Airport – Airspace Change Consultation

1. GENERAL

- 1.1. This response is on behalf of the British Hang Gliding and Paragliding Association (BHPA). The BHPA represents over 90% of the some 7,000 hang glider, paraglider, powered hang glider and powered paraglider pilots flying in the UK. For further information on the Association please refer to our website www.bhpa.co.uk.
- 1.2. The BHPA objects to this proposal for a number of reasons that are to do with the process that has been followed, the content of the consultation document, and the implications should the proposal be approved. The details of the reasons are in the following subsections.

2. PROCESS

- 2.1. The Consultation Document is meant to come after all the affected parties have been informally consulted. Despite the BHPA making repeated approaches for over a year for a meaningful version of such an informal consultation the first offer of a dedicated meeting was for 07th April 2014, two months after the formal consultation document was issued! This is completely contrary to the ACP procedures.
- 2.2. The BHPA and its members found out about the consultation website glitch as a result of talking to other airspace users. Surely the BHPA, as a formal consultee, should have been directly informed about this?
- 2.3. The consultation method via the website is tortuous and heavily slanted towards getting a positive response.

3. CONTENT OF CONSULTATION DOCUMENT

- 3.1. There is a complete lack of an assessment as to the implications for those aircraft that will be displaced from the proposed airspace, and this despite the statements in the document, “[the proposed airspace] takes account of the needs of as many airspace users as possible”, and, “We believe that, on balance, the majority of stakeholders have had their requirements met by the proposed designs.” These statements can either display an extraordinary lack of awareness of the airspace surrounding Farnborough or a wilful ignoring of it, both of which paint Farnborough in an extremely poor light. If there is another reason we will welcome being informed of it.
- 3.2. The environmental parts of the document are again significantly far from the truth with respect to who will be overflowed, at what heights, and with what regularity as a result of the proposal.
- 3.3. The consultation document is excessively and intimidatingly long with undue repetition, including of things that are patently flawed. The poor quality of the consultation document should be reason enough for the consultation to be re-run.

4. IMPLICATIONS

- 4.1. Class D airspace is effectively closed to our pilots. The only exceptions to this are where a Letter of Agreement has been established to permit small areas of access that are both extremely limiting and erratic to the extent that they are effectively useless for cross country flying for the majority of our pilots. The attached plot shows the flights that we know would have been affected should the proposed airspace have been in place at the time. There are two direct effects from the proposed airspace:
- 4.1.1. A significant number of the flights would have been terminated considerably earlier due to there being insufficient Class G airspace to make use of the available lift.
- 4.1.2. All of the flights would have been significantly more hazardous due to the choke point effects of the proposed airspace forcing the existing other traffic into a considerably smaller volume of

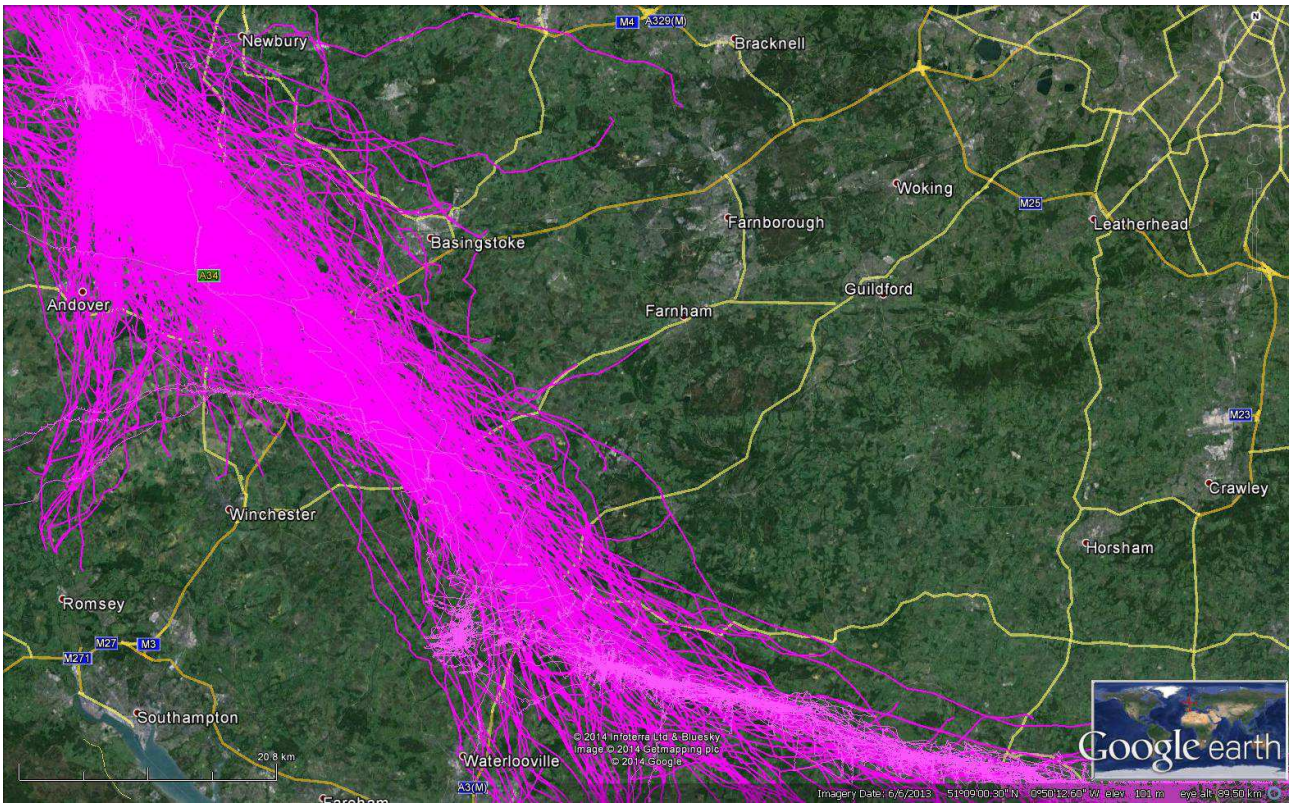
Class G airspace.

4.1.3. The severe extra limitations would significantly alter the activities of our pilots to the extent that they will no longer look to use certain sites upwind of the affected areas. In some cases movement of activities simply isn't possible and they will cease. This movement of activity, where possible, away from long established locations will affect the viability of those locations as continuing operations, and all because Farnborough wishes to expedite the flights of a very few bizjet passengers. This is completely disproportionate.

5. **CONCLUSION**

This proposal does not improve safety for anyone, there is no safety argument within the consultation document, indeed it significantly reduces safety for far more aircraft than those it is seeking to merely financially benefit. As such it is completely contrary to UK airspace policy. Additionally it comes at a time when there is considerable uncertainty over the environment within which it is framed due to both the on-going LAMP project and the yet to be confirmed outcome of SERA, both of which should be resolved prior to any further assessment of the need for controlled airspace in this part of the country.

Tom Hardie
ALO
BHPA
12th May 2014



Paraglider and Hang Glider Cross Country tracks flown between Farnborough and Southampton

(for the avoidance of doubt these aircraft are un-powered soaring aircraft)