

GENERAL AVIATION ALLIANCE

Partnership in Aviation

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Civil Aviation Authority
Fao Mr Clive Grant

Class F - Input to Post Implementation Review

General

The consultation was clearly laid out and was unusually well provided with data (Class F Routes, Trajectory density plots, NATS May 2013) which helped to provide context for informed consultee input. The addendum consultation (Aberdeen Fillets) was also clear and the foreshortened timescale for response to it created no problems.

Communications and mutual sharing of issues and responses between GA and NATS were also a positive factor during the consultation.

Initial CAA decision

After what appeared to be a positive and co-operative consultation we were shocked and dismayed by the CAA's published decision. This created CAS at levels outside the scope of the consultation, at levels where in practice no PATM actually flew, for what appeared to be a single PATM rotation per day and in an area of great importance to Sporting and Recreational Aviation.

CAA Amendment of Initial Decision

With effect from July 2015 N560 between FOYLE and ERSON had its base raised from 5,500' to FL195, a most welcome adjustment and one which was in keeping with actual PATM traffic levels. The section between ERSON and INBAS was also raised from FL105 to FL125. The wording of the amendment included "Other than when notified during large scale Military Exercises such as Joint Warrior". It is unclear to us why the caveat might ever be required; any temporary requirement could be managed by temporary controlled airspace and notified by NOTAM in the normal manner.

We suggest that the phrase should be removed and the chart adjusted.

Disestablished Class F Routes

We are not aware of any problems arising from the disestablishment of several Class F routes. We have noted that PATM continues to route direct between Glasgow and Stornoway along the line of the disestablished A1D and have therefore taken voluntary steps to ensure that this route remains visible on gliding (the major GA user in the area at the levels used by the PATM) navigational software.

Routes to Orkney and Shetland

The CAA decision turned the previous Class F routes W4D and W5D into Class E+ Airways Y904 and Y905. We note that in practice a large proportion of PATM between Glasgow and Edinburgh elects to route direct to Kirkwall and Sumburgh, flying in Class G airspace alongside both the old (P600) and new airways.

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Routes to Connect Transatlantic PATM

The CAA decision turned sections of the previous Class F N580D\W958D into newly created CAS as Airways N580\Y958. We were told that these would provide a CAS environment below FL195 for PATM linking Glasgow\Edinburgh with US destinations; in the absence of A1D they could also provide a CAS environment for flights to and from Stornoway. It is clear that these routes are never used to link to Stornoway, and transatlantic flights appear to use the routes only randomly, often flying parallel to and just outside the new airways. This leads us to question the rationale for creating the airways in the first place.

N560 N of Glasgow

Our input to the original consultation explained our understanding of traffic between Inverness and airports to the South. Destinations from South of Glasgow pass high overhead Glasgow in Class C airspace and do not descend below FL195 until N of INBAS. Southbound departures to airports S of Glasgow also climb above FL195 before reaching INBAS. Only one PATM rotation per day, Glasgow - Kirkwall, flies below FL195 when S of INBAS. Analysis of current traffic patterns simply confirms the logic of our original submission.

The CAA's amendment appears to have recognised this in raising the FOYLE - ERSON base to FL195. Following this exact logic would inevitably also support raising the base between ERSON and INBAS to FL195 rather than FL125. If traffic levels S of ERSON do not justify a base below FL195 then the exact same traffic cannot justify a base of FL125 between ERSON and INBAS. Our request is therefore that the base of N560 is further raised to FL195 between FOYLE and INBAS.

We also note that PATM does not use the lower levels of N560 between INBAS and GUSSE. This area is important for operations at Feshiebridge and we believe that adjusting base levels would benefit gliding operations, minimise unnecessary radio traffic and have no impact on PATM operations. We therefore request that the base level between INBAS and LAGAV is raised from FL105 to FL150 and between LAGAV and NESDI from FL105 to FL125.

N560 N of Inverness

The CAA decision changed Class F route N560D into airway N560. It is clear from observing the few flights per day that PATM prefers to route direct between Inverness and Wick, Kirkwall and Sumburgh. This leaves the actual usage of the new CAS much below that which would have been anticipated at the time of making the decision, indeed there are days when it isn't used at all by any PATM. We request that the CAA assesses the justification for N560 N of Inverness based on current actual (not planned) usage, particularly in the light of the new agreement between Tain, Inverness and Lossiemouth signed in February 2016, and acts accordingly. We believe that the BONBY reporting point should be retained for planning purposes when Tain (D703) is planned to be active.

Yours Sincerely,
John Williams
For the General Aviation Alliance