

GENERAL AVIATION ALLIANCE

Partnership in Aviation

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FARNBOROUGH AIRPORT CONSULTATION

I am writing on behalf of the General Aviation Alliance (GAA) in response to your airspace consultation launched on 3rd February 2014. The GAA is a group of organisations representing, as far as possible, all UK General Aviation (GA), and Sports and Recreational Aviation interests (S&RA). The Alliance coordinates some 72,000 subscription-paying members of these bodies, and it is estimated that in total more than 100,000 people participate overall. Activities cover parachuting, hang gliding, gliding, ballooning, sport and recreational flying in light and microlight aircraft, and in helicopters. The objective of the GAA is to co-operate and engage with government departments and other relevant organisations and bodies on regulatory and directly related matters to support and progress the activities of the sector. The GAA takes a balanced view on proposals to establish controlled airspace and where it is shown to be necessary it gives support.

This response has been agreed by the member bodies of the GAA and represents the view of their constituency of 72,000 airspace users.

The proposal is dis-proportionate, unjustified and highly detrimental to other airspace users and particularly to S&RA. It has provoked unprecedented levels of opposition from individual pilots as well our individual member associations, all of whom have submitted comprehensive and specific responses. In this document we therefore summarise the key over-arching concerns that have an impact right across our sector.

THE CONSULTATION PROCESS

The documentation is of an intimidating length (250+ pages). Despite this it somehow fails to cover essentials such as an assessment of the impact on the safety of all airspace users. It presents noise and environmental information in a confusing and misleading manner. In that light its comment (at Part E 2.11) that "We believe that, on balance, the majority of stakeholders have had their requirements met by the proposed designs" is quite extraordinary. If this is indeed TAG's belief it is abundantly clear that they have no appreciation of or concern for the needs of other airspace users. The only alternative explanation is that they have stated

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something which is simply untrue. In either case it belies an attitude which ought to disqualify any ACP sponsor as being unfit to participate in the process.

We also have major concerns over the manner in which the response questions are structured. This appears to be an attempt to shepherd those who respond into limited areas where their answers might best suit TAG's purpose. The alternative method of responding with a free form response (such as this one) covering the proposals as a whole does exist, but requires inappropriate determination from a reader to discover it.

We also know that on-line responses have been lost, at least for a significant period, and that those who submitted during that period received an on screen confirmation of their input. Through our member organisations we have tried to publicize this failing in the hope that inputs would be re-submitted but there can be no certainty that this happened. The 10 day extension to the consultation deadline was welcome of itself but cannot fully compensate for the original fault. The consultation process has been indisputably compromised.

STRATEGIC CONTEXT AND TIMING

Because of the uncertainties generated by FAS, LAMP, Airports Commission and SERA there could hardly be a worse time to present or decide on a proposal that seeks to create large quantities of lower level CAS in SE England. Regardless of the face-value merits of the proposed airspace any decision to approve it would fly in the face of imminent nationally strategic decisions. Rather than reiterate the detail here we refer readers to the clearly laid out logic in the LAA's response.

Without a safety case and without any credible reason to support their growth predictions we can only surmise that TAG are "trying it on" in an opportunistic attempt to acquire the aviation equivalent of a ransom strip in the hope that neighbours and planning authorities are "asleep at the wheel".

PROPORTIONALITY OF THE PROPOSALS

TAG is not a public air transport operator, it is a private business that makes up less than 10% of movements in the area in question. Its proposals are predicated on unsubstantiated rapid growth; this is against a background of declining numbers and a track record of false predictions.

We find it remarkable that any sponsor should propose new Class A airspace in lightly used areas at the very time when the London TMA is being down-graded from Class A to Class D. One user of the airspace has likened the proposal to a limousine company trying to buy up two lanes of the M25 – we find that a useful analogy to convey the attempted sequestration of airspace by TAG against the interests of the majority of legitimate users.

SAFETY OF ALL USERS

We are dismayed and astounded that explicit safety concerns (repeatedly raised by our members during pre-consultation) are not deemed worthy of consideration or mention in the proposal. Anyone with the slightest understanding of how GA traffic flows in the area would know that the proposal creates blocks and choke points which must radically increase risk to other users and to the adjacent controlled airspace. To deliberately ignore the issue, as the proposal does, is simply irresponsible or perhaps indicative of an issue that would weigh heavily against the TAG case. Any sponsor considering even small changes to CAS in such a critical area should be required to risk assess its consequences and involve those it puts at risk. Should you proceed to submission to the CAA your Operational Report is required to set out the operational, economic and safety consequences of the proposed airspace on other airspace users. As you have dismissed these consequences in the consultation we expect you to set out our position as

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described in more detail by our member organisations. We would be grateful if you would provide us with a copy of this part of your Operational Report.

NOISE AND ENVIRONMENT

Both noise and environmental matters are presented in an obfuscating manner. The documentation focuses on aspects where there might conceivably be benefits while downplaying or ignoring areas where there are likely to be damaging consequences. This impairs attempts (by anyone other than determined specialists) to reach an objective overall assessment.

CONCLUSION

In a flawed process TAG are proposing the creation of CAS for their own convenience in a way which is grossly detrimental to the safety of others and flies in the face of overwhelmingly important national strategic matters. It would have a serious operational and economic impact on our sector but you have denied this in your consultation.

On behalf of our 72,000 members we object to the proposal in its totality and in the strongest possible terms.

John Williams

For and on behalf of the General Aviation Alliance