GA Alliance Response to
Doncaster Sheffield Airport Airspace Consultation

Airspace Change Proposal for the Introduction of RNAV (GNSS)

Departure and Approach Procedures. September 2017

About the General Aviation Alliance

The General Aviation Alliance (GA Alliance) is a group of organisations representing the interests of many in the UK General Aviation (GA) industry. It was formed in 2004 to address the need for co-ordinated response to UK regulatory issues.

Members of The Alliance include; British Balloon and Airship Club (BBAC); British Gliding Association (BGA); British Hang Gliding and Paragliding Association (BHPA); British Microlight Aircraft Association (BMAA); British Parachute Association (BPA); Helicopter Club of Great Britain (HCGB); Light Aircraft Association (LAA); PPL/IR Europe – European Association of Instrument Rated Private Pilots; Royal Aero Club of the United Kingdom (RAeC). The Alliance coordinates about 72,000 subscription paying members of these bodies.

Response

Numbers of GAA members have responded individually generally supporting that presented by the British Gliding Association (BGA).This is to formally confirm that that is the position of GAA as a whole. The statement is repeated below:-

1 We understand and support the need to modernise and rationalise UK airspace in order to create structures which are efficient, safe and proportionate for all users. On principle we do not object to the creation of CAS where significant numbers of passenger carrying CAT must fly and where the needs of all users have been sought and used to create a coherent airspace design that proportionately meets everyone's needs.

2 As commercial air transport aircraft performance and air traffic management technology continues to improve we expect environmental considerations (noise and fuel) to require steeper climbs and descents to airports using accurate and repeatable paths. This in turn should lead directly to significant reductions in CAS rather than increases.

3 Airspace is a finite national asset and its management and control requires a carefully co-ordinated approach. Too often change proposers input solely *their* requirements to a consultant and the consultants use these to generate a design which ultimately goes out to wider consultation. Already at this stage there is considerable financial and organisational commitment to what has been produced and a reluctance to change the design. To achieve a fair, proportionate and optimal airspace design it is, of course, necessary to establish the needs of *all* users and input *those* to the design process. Anything else inevitably leads to one-sided proposals which must unfairly impact everyone but the original instigator.

4 Modern technology such as RNAV should be used as a catalyst for improved routings with steeper climbs and descents . Too often we see that change proposers fail to exploit the benefits on offer and simply replicate existing outdated and inefficient procedures in order to avoid consultative workload. The irony is that such fear of noise consultation results in the opportunity for a better and quieter environment being missed.

5 When designs or re-designs are done it is important that the whole system is examined - otherwise a fragmented approach will inevitably lead to missed opportunities. When different parts of a system are managed by different organisational entities these risks increase - for example, when an airport looks in isolation at its lower level airspace without considering the integration with en-route airways that connect to it.

Doncaster Background

It is our opinion that the original granting of a large swathe of Class D on grounds of grossly inflated traffic projections was a major error. Indeed, senior CAA management are on record as stating that some 70% of the associated CAS should be declassified. The failure of the extremely belated PIR to achieve this reduction has resulted in an independent ACP proposing a more proportionate arrangement.

PLAS

For some years, NTCA and subsequently PLAS have been examining opportunities to rationalise and improve airway and airspace use.
It is striking and disappointing that Doncaster's current ACP appears to be independent and uncoordinated with this work.

Conclusion

We find that the ACP fails to take into account the changing environment in which Doncaster operates. Proposing new CAS at a time when the regulator has stated that the case for the existing CAS is flawed and a new ACP to rectify this situation has been launched is entirely inappropriate. Proposing SIDs and associated CAS which are not carefully coordinated and optimised with PLAS is equally inappropriate. Failing to lay out the safety case or demonstrate a data driven design which caters for other users' needs is a further reason to reject this or any other ACP.

On these fundamental grounds we state our objection to the proposal in its entirety.

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