

GENERAL AVIATION ALLIANCE

Partnership in Aviation

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GA ALLIANCE DRAFT RESPONSE TO LBA AIRSPACE CHANGE PROPOSAL

1. Background

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

Members of the GAA 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 GAA coordinates about 72,000 subscription paying members of these bodies.

The GAA understands and supports the need to modernise and rationalise UK airspace in order to create structures which are efficient, safe and proportionate for all users. In particular 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 actively factored into the proposed airspace design.

However it is logical that, with improving CAT aircraft performance, we would expect noise and fuel considerations to require steeper climbs and descents to airports. We believe that these should go hand in hand with significant reductions in CAS footprints. We are therefore dismayed to find that LBA is seeking large increases in the footprint and volume of CAS at a time when aircraft performance and technologies should permit moves in the opposite direction.

We do not expect airports to seek additional airspace as a convenience, as an alternative to employment of sufficient controllers to properly manage traffic or as a means to express additional value to potential investors.

*British Gliding Association
British Hang Gliding and Para gliding Association
British Microlight Aircraft Association
British Parachute Association*

*Royal Aero Club of the United Kingdom
Helicopter Club of Great Britain
Light Aircraft Association
PPL IR Europe*

We understand that no individual body necessarily understands the needs of all airspace users in any particular area. Those wishing to make changes or solve problems must therefore take steps to involve others and understand their needs as a prerequisite for any design activity. The GA Alliance through its members stands ready to assist in such problem solving or input to design concepts, however the arbitrary manner in which LBA's consultants have formulated their proposals has done little to encourage dialogue.

Safe, expeditious flow of traffic is important to all airspace users. However, there appears to be an incorrect assumption that airspace safety is all about controlling aircraft. It is UK policy that the default airspace is class G and that restricted airspace must be fully justified. We believe that the current proposal for this airspace design is not justified.

The Regulator has a duty to take account of the needs of all airspace users in assessing an ACP. We believe that the Controlled Air Space requested in this ACP is both disproportionate to any reasonable requirement based on the Operator's own Strategic plan; and disadvantages other airspace users in ways that cannot be justified.

2. The LBA Proposal

It appears that the primary motive for the proposal is for new arrival procedures which require a greater airspace footprint to facilitate continuous descent. However, we find it astonishing that LBA's consultant should proffer a design which by their admission does not consider the safety of GA traffic and by its design; the proposed Class D airspace could significantly increase the likelihood of potential collision and controlled airspace infringement which the entire flying community is seeking to minimise.

We find that the justification quoted by LBA for proposing the change is not evidence based and appears to cling to unsustainable growth projections. Even then we do not understand how increased traffic would demand the creation of low level CAS 15 or 20nm out – unless the proposal is put forward as an alternative to using environmentally sound procedures or employing a suitable numbers of controllers. Even if growth were to be shown to be a justifiable reason to increase CAS, we would expect the CAA to make the approval of such airspace directly contingent on achieving specified CAT growth.

It is noted that in justification, LBA quotes national policies relating to developing smaller airports and requirements for new Air Traffic Control (ATC) procedures. This justification is undermined by a statement that ground facilities will be expanded "as and when required"; which does not demonstrate a willingness to underpin this ACP with a fully developed strategic development plan to allow the expansion of their operations. In addition it appears that the CAS requested in this ACP is not consistent with the Operator's own Strategic Development Plan 'Route to 2030'.

3. Impact on GAA activities.

It is noted that other GA airspace users with more local knowledge have expressed specific concerns. The Yorks, Derbyshire & Nottinghamshire Regional Soaring Airspace Group (RSAG), which represents the views of over 2000 gliding and paragliding pilots and pilots, plus at least as many other pilots who visit because of the favourable soaring conditions in the region, and Sherburn Aero Club whose long-established airfield is immediately adjacent to the proposed eastern boundary of class D airspace, have specific concerns.

In the case of the latter, aircraft flying a previously promulgated noise abatement circuit would pass within a few hundred yards, and in the case of faster aircraft, within nine seconds, of infringing CTR3 while still in the Sherburn circuit. Rather than repeat the further points of detail here, we refer you to their responses.

As well as locally-based airspace users, we have serious concerns that the proposed ACP will impact on GA aircraft wishing to cross East-West, or vice-versa, across the Pennines, and for traffic heading North-South, wishing to avoid controlled air space.

Traffic heading East-West would face significantly reduced routing options, as the traditional routes below controlled airspace would no longer be available. The only options without a class D transit would be significantly northwards beyond CTR2, or significantly southwards in the region of the Emley Moor transmitter mast. Traditionally, VFR and even general aviation IFR transits across Leeds have been difficult due to lack of controller capacity and there are significant concerns, unaddressed in this ACP that LBA will have the resources to facilitate the necessary level of class D access to general aviation in the future.

There is also likely to be a 'bottleneck' effect for North-South and South-North transiting traffic, between CTR3 and the Sherburn (EGCJ) and Leeds East (EGCM) ATZs, with a commensurate increased risk of conflict or infringement in a very narrow North-South corridor (about 1 mile), with a low ceiling at its entry/exit point (3000 feet beneath CTA4 and 4000 feet beneath CTA10).

It is extremely likely that there will be conflicts and a collision risk between traffic passing in this corridor. Moreover, there is a high risk of infringement, either of the proposed Leeds class D airspace or of the Sherburn ATZ by traffic flying in this gap. There is a further collision risk not just in the gap, but because of traffic flying deliberately wide (i.e. to the east) to avoid infringement of CTA4 and CTR3 and thus potentially infringing through the Sherburn and Leeds East ATZs/circuits.

4. Mitigation

It is noted that Sherburn Aero Club have proposed a form of mitigation in the form of a low-level, North-South VFR corridor be operated along a 2 mile-wide eastern band of CTR3, and to remain east of CTR1, up to 2000 feet (increasing the available North-South transit route from a width of approximately 1nm to 3nm), operating in much the same way as the Manchester low-level corridor.

This would be operated as Class D airspace, but aircraft 'listening' to the Leeds air traffic control primary frequency would be able to enter and use this corridor, VFR, in a north-south direction without obtaining an explicit clearance. The VFR corridor could deliver opportunities for reduced controller workload as the aircraft in the proposed VFR corridor would be regarded as "known traffic" with an implied clearance. However while appropriate for powered traffic, this does not mitigate the ACP's effects on the gliding and soaring community, or other Class G airspace users.

It is noted that some mitigation has been proposed by LBA in the form of 'Variable Airspace' above the Sherburn ATZ with a variable base depending on time of day. This however would merely compromise the use of airspace above Sherburn aerodrome for training purposes, and add to the potential for infringement, due to confusion as to the altitude/level of the airspace at certain times.

The proposed new controlled airspace (CTA9) above Sherburn Aerodrome has a daytime base of flight level 55. This reduces to 3500 feet after 18:00 hrs. A base of controlled airspace of 3500 feet above the aerodrome is unacceptable, as this limits instrument training, use of the beacon, upper airway work and training for practised force landings.

It is also noteworthy that the availability of the higher base is predicated on increased numbers of traffic controllers rostered during these hours. We have little confidence that this situation will be maintained once the airspace has been granted. In addition it is unclear how the variable airspace can be displayed on standard VFR charts to offer clarity and lack of confusion to the general aviation community. Pilot uncertainty and confusion is likely to have safety impact on GA operations in the locality.

5. Airspace 'Trading'

It is noteworthy that an area of to the south of Sherburn aerodrome is designated by letter of agreement between Doncaster ATC and Sherburn Aero Club as the "Southern Training Area". This area sits below Doncaster class D space with a base of 4000 feet, with the option for this to be raised. This area is used for flight training exercises which cannot be practised or carried out at low-level. It is proposed that control of the airspace will be transferred to Leeds class D, CTA12, with the base of at 3500 feet after 1800 hours, effectively rendering it unavailable for upper air training exercises after this time. It also appears that there is no arrangement in place to transfer the letter of agreement regarding its use by General Aviation.

We also must express serious concerns at the implication here that areas of airspace are commercial assets that can be 'traded' between operators when it is required by CAA Airspace Policy that any airspace changes are proposed in the interest of the safety and security of all airspace users.

6. Summary

In summary, and for the avoidance of doubt, we state here that we object to the proposal in its current form; which we believe to be disproportionate, unsafe and fails to consider the needs of other airspace users. We believe that in the absence of appropriate justification for the ACP, the airport and CAA DAP should consider significantly reducing the size of the airspace to be designated Class D; based on modern commercial aircraft performance and new approach and departure procedures.

In particular we would specifically suggest you review the following:

1. The close proximity of the boundary of the proposed CTR3 to the Sherburn circuit, offering little time for departing traffic to make timely contact, raising the likelihood of infringement.
2. A proper safety assessment of the greater risk of conflict or collision to VFR traffic routing between CTR3 and the Sherburn (EGCJ) and Leeds East (EGCM) ATZs.
3. A proper assessment of the efficacy of the proposals made by Sherburn Aerodrome for a low-level corridor to mitigate the concerns above and reduce controller workload.
4. The safety and VFR operational implications of the ceiling imposed by CTA4 (3000 feet) and CTA10 (4000 feet).
5. The safety and likely increased risk of infringement created by the proposed 'variable airspace' ceiling varied by time in CTA9 and CTA12. In addition greater clarity is required on how such proposals would be displayed adequately on VFR charts.

6. Stronger guarantees that controller availability will be maintained to ensure appropriate access to airspace for GA traffic. Named contingencies including reversion of airspace to Class G if it cannot be adequately controlled.
7. Comments on the proposals from the BGA and RSAG to accommodate other aircraft including gliders.

We believe that, both at a local level and nationally, the General Aviation Alliance can make a positive contribution to future airspace planning. However the introduction of this ACP in its current form and the proscriptive manner in which LBA's consultants have formulated the consultation, does little to encourage positive dialogue or proportionate airspace planning. Therefore we recommend that the ACP it is withdrawn for further review.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Stephen Slater', with a stylized flourish at the end.

Stephen Slater
for General Aviation Alliance

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