

GENERAL AVIATION ALLIANCE

Partnership in Aviation

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17 February 2016

Airspace Change - Sponsor Consultation
London Biggin Hill Airport
Main Road
Biggin Hill, Bromley
TN16 3BN

ACP@bigginhillairport.com

Dear Sirs,

LONDON BIGGIN HILL AIRPORT AIRSPACE CHANGE PROPOSAL

ABOUT US

I am writing on behalf of the General Aviation Alliance (GAA) in response to your airspace consultation dated 16 November 2016.

The GAA is a group of organisations representing, as far as possible, UK General Aviation (GA) and particularly Sports and Recreational Aviation (S&RA) interests. The Alliance coordinates some 72,000 subscription-paying members. These members represent the owners/operators of around 60% of the UK registered aircraft fleet rising to over 70% when unregulated aircraft are included. Activities cover parachuting, hang gliding, gliding, ballooning, plus sport and recreational flying in light and microlight aircraft and in helicopters. The objective of the GA Alliance is to co-operate and engage with government departments and other relevant organisations on regulatory and directly-related matters, to support and progress the activities of S&RA. This response has been agreed by the member bodies of the GA Alliance. Individual associations may also submit responses to deal with issues specific to their operation.

ABOUT OUR RESPONSE

The GAA supports instrument approaches in Class G airspace, most of which are in open areas with plenty of room to avoid conflict, often with facilities to provide a deconfliction service to IFR and VFR traffic. We have supported every previous introduction of an RNAV approach. We fully understand the wish of Biggin Hill Airport Ltd to have an instrument approach into 03.

ISSUES FOR GAA ORGANISATIONS AND MEMBERS

Unlike many other airports which have or are developing RNAV approaches, Biggin Hill Airport is in a very restricted Class G area between LHR, LCY and LGW CAS. Its ATZ reaches to about

*British Balloon and Airship Club
British Gliding Association
British Hang Gliding and Paragliding Association
British Microlight Aircraft Association*

*British Parachute Association
Royal Aero Club of the United Kingdom
Helicopter Club of Great Britain
Light Aircraft Association
European Association of Instrument Rated Pilots*

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1.5NM from the LGW CTA, which gives possibly the tightest 'pinch point' for VFR traffic in the country and probably one of the busiest, given the volume of East/West traffic passing between the LHR and LGW zones. It is a significant route for VFR operations in the south of England and the position of the London airports prevents any operationally useful alternative. This route has been wholly satisfactory largely due to the M25 passing through the gap, giving the narrow corridor an excellent visual navigation aid, the right hand rule keeping opposite direction traffic apart. VFR traffic in this corridor may be at any reasonable height, but will often be at 2200 – 2400ft QNH in clear conditions, or 100 – 200ft below the cloud base when this is lower. There is virtually no conflicting crossing traffic due to the proximity of the Gatwick CTA.

This proposal has IFR traffic in the procedure crossing this M25 corridor twice, firstly in descent to 2000ft QNH to the IAWP where it passes through the busy M23/M25 VRP, and secondly in descent from 2000ft to 1800ft approaching the FAF. There seems no opportunity to alter these altitudes, as aircraft cannot be above 2000ft within the LGW CTA for clearance from LGW traffic, nor below, given the 600ft Altitude of Biggin Hill Airport. It is all very tightly packed with only 3NM final to threshold from the FAF. Cloud bases in the UK are often around 2000ft QNH, and an incoming aircraft will often be just breaking cloud as it crosses the M25 one or other time, in which case neither it nor a conflicting VFR aircraft would have visual awareness of the other, it being common practice to fly 100ft to 200ft below cloud to keep maximum height agl in single engine aircraft.

Even in CAVOK conditions, the proposed procedure would be expected to be a hotbed for airproxes and TCAS RAs, with little room for avoidance without infringing CAS or the ATZ. RAs have to be immediately acted on by pilots, irrespective of controller's instructions. Biggin Hill Airport does not have radar; the ACP does not give information as to plans for avoiding such conflicts, or any analysis of risk. In particular, there is no indication of what radar service is to be given to traffic by Thames Radar and/or Gatwick Approach or if Biggin Hill Airport intends to provide a radar service itself. Moreover, approach traffic would normally be transferred to tower frequency by about 3nm to touchdown which is in the middle of the VFR corridor and is the last place that pilot attention should be distracted. In any case we understand that tower has no access to a radar picture to be able to warn of potential collisions and there is no mention of any plan to provide it. We are also aware that a proportion of Biggin Hill Airport IFR traffic is not equipped with TCAS.

One of our member organisations tried to discuss with the ATC manager Biggin Hill Airport how the risk would be managed, and in response the airport's agent, Richard Wright of Cyrrus wrote "*Class G airspace is that it is available equally to all airspace users. It does not seem appropriate, therefore, for one group of Class G airspace users to seek limitations on another user of that airspace*". We found that to be an astonishing response to an attempt to find a way for us to accommodate the Biggin Hill Airport proposal with any degree of safety. Continuing the Cyrrus response to us, Mr Wright concluded that "*the safety management aspects of this proposal, as stated in my reply to you of 02 December 2015 are required to be submitted to the Civil Aviation Authority for their consideration at the conclusion of the consultation period*". Given the superficial treatment given to the risk of airborne conflict that would result from the proposed procedure, we have no confidence in the sponsor of this airspace change to make an adequate and balanced submission to the CAA.

We consider therefore that as it stands, the ACP represents unacceptable risk to both traffic using the procedure and to the high volume of VFR traffic following the M25. It is essential to VFR operations in the south of England that the availability of the VFR corridor is retained.

CONCLUSION

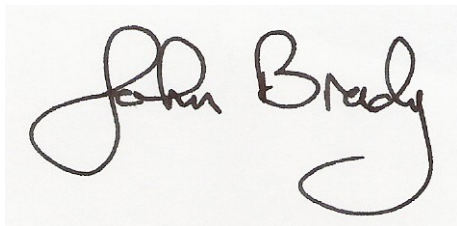
We have attempted to engage with Biggin Hill Airport to debate mechanisms that we think could facilitate the establishment of this approach whilst managing the clear risk that it presents but

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we have been rebutted. Biggin Hill Airport and its consultants have failed to engage with us. We reluctantly submit that this ACP should be withdrawn and replaced with one analysing the risk to all traffic in the outer Biggin Hill Airport area, and which shows how airborne conflict will be avoided. We stand ready to cooperate fully should you wish us to be involved in the development of a safer proposal.

The General Aviation Alliance is cognisant of the recommendations from the CAP725 review particularly on transparency. If Biggin Hill Airport intends to submit a safety analysis as part of its ACP submission as suggested by Cyrrus, we would wish to see that analysis and be consulted on its content so that we can contribute to the decision process and to air safety generally. We would be grateful if you would include your intentions on this as part of the feedback report so that, if necessary, we can make the strongest safety representations to the regulator.

A handwritten signature in black ink on a light background. The signature reads "John Brady" in a cursive, flowing script. The first name "John" is written with a large, sweeping initial 'J' that loops back under the name. The last name "Brady" is written in a similar cursive style with a large, sweeping initial 'B'.

John Brady

For the General Aviation Alliance