

HELICOPTER CLUB OF GREAT BRITAIN



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Roger Walker
Director of Airport Operations
Farnborough Airport
Hampshire
GU14 6XA
United Kingdom

Dear Mr. Walker,

Re: Proposed Controlled Airspace at Farnborough

I refer to the consultation documents, setting out your proposals for controlled airspace in the vicinity of Farnborough Airport.

The Helicopter Club of Great Britain represents the owners of approximately 33% of UK registered helicopters, as well as several hundred UK helicopter pilots. We are also members of the GA Alliance, GASCO, GACC, GAAC and the NATMAC.

We object to your proposals in their entirety, for the reasons detailed below.

Need for Class D airspace

The current traffic volumes at Farnborough do not support the imposition of the large area of controlled airspace you propose, and they are unlikely to for the foreseeable future. The proposal has a look and feel of 'empire building' to it. You are asking for a huge area of airspace, but would use it many times less efficiently than major airports. You seek to reserve a vast area of the south east England almost exclusively for your own use, convenience and commercial benefit, with little, if any, thought or concern for other airspace users.

Your website announces that you are "DEDICATED TO BUSINESS AVIATION" and that "Every need is anticipated for VIP passengers. Your

'wish list' may very well include near exclusive use of the airspace around Farnborough, but that is no reason for its introduction. Business jets co-exist perfectly safely with General Aviation at many other airports in class G airspace both in the UK, Europe and North America.

There is little evidence that the present airspace arrangements are unsatisfactory from the safety viewpoint. You show a short list of alleged airproxes, in the area, an extremely low number, and nowhere near a level that could be called hazardous. Whilst your radar staff may have 'logged' General Aviation flights within a radius of Farnborough airport, it does not follow that there was a danger to anyone or that there is a safety case for controlled airspace.

Airspace Design

The whole of south east England's airspace is, in any case, under review under the LAMP initiative. Your application takes no notice of this major fact, or the reality that any airspace proposals should await the outcome.

Heathrow CTR airspace

Your proposals seek to annex the south west corner of the Heathrow CTR, despite saying at B 5.2 that

5.2. No Farnborough flights operate within this area.

If Heathrow is willing to give up this portion of their airspace, it should return to Class G airspace. This would give VFR traffic a route to avoid your proposed Class D airspace, without having to contact you. This would also allow non-radio aircraft to travel from north to south and vice versa. If necessary, a TMZ here might satisfy Heathrow, and allow contact-free transits. It should most definitely not be given to Farnborough to 'control'. You do not use it, you do not need it, and thus you should not control it.

Your proposed Class D airspace would create a 'wall' of controlled airspace from the surface to the LTMA, from east of London City to Lasham. A VFR, uncontrolled corridor is essential, in the same way and for the same reasons as it is essential through the Manchester / Liverpool airspace. The southwest corner of the London CTR could provide this, but you have not proposed it.

Frequency Congestion

Your proposals make no mention at all of how you propose to administer the proposed airspace. Your existing frequency of 125.25 is already vastly overloaded on good flying weather days. You clearly need a completely new frequency for zone transits, to be staffed adequately for the purpose, especially on peak days. This is your obligation when seeking class D airspace. Any Class D airspace granted is not just for Farnborough traffic, and you have an obligation to give access to all traffic, without the excuses of 'controller workload' or messages to 'standby'. Your lack of any expressed

concern for this critical aspect of the proposal shows your probable wish to exclude as much GA traffic as you can. Your FAQ's state that your ATC manning would increase by just one controller, hardly enough to cope with the transit traffic.

Recent Farnborough ATC attitudes and culture

Many of our members report that Farnborough ATC is only concerned about expediting their business jet traffic. Reports include being 'requested' to route many miles east and west of the airfield because of your arriving or departing traffic is 'expected'. This, in reality, has resulted in aircraft flying many miles away from track, just because you are expecting an arrival or departure in the next 10 or 15 minutes. One member, who was about to cross the eastern extended centreline of 24/06, outside the ATZ, reports being asked to route to the west of the airfield because a bizjet was taxiing for runway 06. He quite rightly refused this last second diversion request, and was, in any case, well clear before the aircraft was even ready for take off. This emphasises the true culture of Farnborough ATC, which is "clear everything out of the way for us". And, this happens now, when you only have control over your ATZ. There is little doubt that the same, or probably an even more restrictive attitude would prevail, and extend to all of the proposed class D airspace, to the benefit of Farnborough and the severe detriment of everyone else.

Flexible use of airspace

Your proposals go against the fact and spirit of the CAA's policy of 'Flexible use of Airspace'.

The Class D airspace requirement for an ATC clearance is very restrictive for GA operations. It may become even more restrictive once the new SERA come into force. Whilst you may say you intend to routinely grant transit clearances, with no details of your technical provisions given, there will inevitably be ATC workload constraints, resulting in refused transits, or instructions to 'standby' or 'remain clear' for long periods. In SERA restrictive weather, controllers would have to separate VFR flights from IFR, leading to a higher controller workload, and greater separation distances. Thus a large volume of airspace will often be practically unusable for GA traffic.

Your proposals make no mention of the fact that it is incumbent on the controller (i.e. Farnborough airport) of Class D airspace to allow full and free access to that airspace, subject only to conflicting traffic. Thus the ATC unit must be equipped and staffed to handle all transit traffic. Grant of Class D airspace does not reserve it for the exclusive use of the controller. There is, of course, a cost to the controller for this equipping and staffing, but that must be viewed as the price to pay for the privilege of controlling the airspace. Any grant of controlled airspace is a benefit for the airport, in Farnborough's case particularly, as you clearly expect it to attract business jet traffic.

Safety degradation for GA

The proposed Class D airspace would create dangerous choke points outside the zone, especially between Lasham and Southampton, and would completely block existing transit routes between Farnborough and the London CTR at the Bagshott mast. Such choke points are a serious hazard for both GA and Military traffic. The risk of airspace infringements and mid air collision would also be greatly increased by the concentration of GA traffic in the smaller areas of Class G airspace.

Your proposal pays no regard to these safety hazards, and does not even mention them! Clearly this is not important to you! Once again 'clear everything out of the way for us'!

Economic benefits and costs

There is much detail of the economic benefit to Farnborough's customers in terms of convenience etc., but no consideration at all has been given to the additional fuel, time etc. used by GA traffic avoiding the proposed airspace.

Noise and Environmental

Your proposals are not as friendly as the proposal documents lead the reader to believe. The proposed new routings show that some people will be overflown much more often, and at a lower level than at present. Some people may be overflown less, but most of those currently only have one flight per day overhead. The proposal 'hangs' new controlled airspace under the existing LTMA. So far from keeping your bizjet customers higher for longer, the new airspace will bring them lower, sooner, with detrimental effects on the environment. The reality would be exactly the opposite of what you say you want to achieve.

An alternative proposal

The current Farnborough proposal has very little merit for any airspace user, other than Farnborough's own traffic. The reality of this proposal is Farnborough's desire to reserve the airspace around the airfield for its own use, and to fiercely limit GA access.

At the very most, a small area of TMZ or Class E airspace, along the extended centreline of 24 only, might be useful close to Farnborough airport. This, together with the radar deconfliction service you provide, could give the IFR/IFR separation you feel is needed for safety, and would allow VFR traffic to continue under the see and be seen principals in VMC conditions. This would have the benefit of allowing VFR traffic to transit the area without a compulsory ATC clearance or radio contact. Such Class TMZ or E airspace would be extremely cost effective for you, in reduced equipment and staff requirements.

We see no need at all for the proposed substantial areas of surface based class D airspace north and south of the ATZ. Almost all of Farnborough's

traffic will receive radar vectors to the ILS, and it is completely unnecessary to impose Class D airspace for seldom used NDB procedures etc.

Presentation of the proposals

The presentation of the proposal is padded out to 259 pages. So poor is the detail contained therein that a supplementary VFR map had to be issued to properly show the extent of the proposed airspace. The proposal mixes up the controlled airspace issue of concern to GA with those of local residents. False and misleading statements are made such as (the proposal) "takes account of the needs of as many airspace users as possible", and, "We believe that, on balance, the majority of stakeholders have had their requirements met by the proposed designs." These self serving statements are misleading and fundamentally untrue. The questions to which responses are sought are very narrowly defined, and so not allow full expression. Thus we are responding by free form letter.

Summary

The proposal to establish Class D airspace around Farnborough Airport is self serving in the extreme. Not only are Farnborough traffic levels relatively low, but tens of thousands of GA flights would be disadvantaged. Safety would be substantially degraded for all but your own traffic. There is no attempt in your proposals to balance the needs of GA traffic with your own. The proposal seeks to avoid the need for Farnborough traffic to use the London TMA, regardless of whether this is efficient use of that airspace. Little consideration has been shown concerning the increased problems that would be caused to General Aviation by the proposals.

A small area of TMZ and/or Class E airspace would quite adequately address the reasonable needs of Farnborough Airport.

We support entirely, and reiterate, the response, objections and comments of the General Aviation Alliance, The Light Aircraft Association, The British Gliding Association, the British Microlight Aircraft Association and PPL I/R to this proposal.

We therefore object to the proposal in its entirety, and will pursue this objection should it progress to the DAP.

Yours sincerely,

J.F.H. James
Hon. Secretary
Helicopter Club of Great Britain