



Response to Farnborough ACP

Introduction

PPL/IR Europe represents the interests of private pilots who operate under IFR.

While most of our members spend much of their time operating light aircraft (from two seat SEPs to light turboprop twins) in airways, we also represent a significant minority who fly IFR outside controlled airspace (OCAS) using the privileges of IMCR/IR(R). Furthermore, the majority of our members also operate VFR OCAS on a regular basis. Finally, it is in the nature of the LTMA that even those of our members who maximise their time inside the airways system find themselves operating in the BIG-OCK-MID-CPT area, OCAS, while they await joining clearance or having been dropped out of the airways system inbound to one of the many VFR GA airfields in the area.

PPL/IR Europe has studied the ACP and considers that its format does not meet the requirements of a balanced consultation, as it is prone to pose its questions in an “Alternate Close” fashion, meaning that none of the proffered answers to questions coincide with the view which PPL/IR Europe would like to express.

Accordingly we will respond in free form.

We object fully to the proposals. We do not make any suggestions for mitigation of the Class D or Class A airspace because we believe that the whole premise of placing controlled airspace across the busiest GA choke point in the country is flawed. If the CAA, DfT, the Courts and Parliament were to accept that the ACP should be agreed, we would be prepared to discuss mitigation, but it is our view that any such discussion at this point would be premature and would weaken our stance, which is just to say “no.”

While on behalf of our own members, we can raise no objection to an alternative TMZ/RMZ arrangement, as all our members are so equipped, we recognise that the imposition of such zones would be restrictive on other airspace users, such as gliders, ex-military aircraft and microlights, and, if asked, would be prepared to stand on the principle of not removing airspace amenity from one group in order to grant it to another.

Fair Airspace Usage

Our principal and strongest objection to the proposal is that we do not agree that one set of General Aviation aircraft which are operating out of a particular airfield should be offered preference to airspace occupancy over any others which are operating from nearby airfields or transiting.

Whereas we accept that Commercial Air Transport operations deserve and require a higher level of airspace protection to that of GA, and we are therefore content to fit around the needs of Heathrow, Gatwick etc., we do not recognise that Farnborough traffic has the same privilege.

As far as we can determine from the data available, the average passenger load on aircraft operating out of Farnborough is 1.3. This is based on the average load of a revenue flight being 2.3, but nearly half of all flights being positioning flights. If we include crew, the average load is around 4, allowing for a cabin attendant on all revenue flights and half positioning flights.

That average load places Farnborough aircraft on much of a par with GA aircraft operating out of Blackbushe and Fair Oaks and transiting from Biggin Hill, Redhill, Popham and all other affected GA airfields.

Thus, it is simply neither fair nor just that Farnborough aircraft should be given automatic precedence over airspace outside their ATZ.

While we recognise that the ACP is proposing largely Class D airspace, and that transits under both VFR and IFR are therefore possible, it is also very clear that Farnborough controllers would be giving those transits lower priority than their own movements. Furthermore, we already know that Farnborough controllers are not sufficiently resourced to offer a radar service to the large majority of aircraft operating in the area, so we can be confident that they would be under-resourced to provide transits, especially when conditions demand SVFR.

Additionally, there is a significant chunk of Class A proposed, and the amenity of that airspace will be lost to traffic which is not equipped or qualified, or whose mission does not suit the airspace.

SERA

Under Standardised European Rules of the Air (SERA), due for implementation before the timescales of the ACP, rules for VFR zone penetration become much more proscriptive than under the current legislation.

VFR traffic will have to remain 1000' from cloud, which, in this context means, to all intents and purposes, below cloud.

That means that on days when the cloudbase is lower than 1800' above the highest ground (1000' plus 500' plus 300' for unknown obstacles) VFR will not be permissible.

There are spot heights of 740' in the Alton area and 920' near Haslemere. That means that the cloudbase at Farnborough would have to be 2600' before VFR transits are permitted, and even then, aircraft would be flying at minimum altitude, which is unsafe both from a CFIT point of view and in the event of engine failure. It would also preclude flying over Woking, Guildford, Farnham, Aldershot, Farnborough and Camberley under both 3(c) and (d) of Rule 5.

There are a substantial number of days each year in the area when the cloudbase is below 2600'. Under SERA, traffic would then have to be granted SVFR clearance, which places additional burden on ATC, reducing its availability for other tasks such as providing IFR transits.

So the imposition of controlled airspace increases the risks of both CFIT and engine failure.

Safety of Transiting Aircraft

Given that Farnborough would not be in a position to grant transit to all aircraft requiring it, a proportion would have to route around airspace. Furthermore, a large proportion of less confident and non-radio traffic would choose to avoid the airspace (we know this empirically, whatever the rights and wrongs). Thus the corners and choke points around the airspace would become hazardous. It does not take much analysis to identify where the dangers would lie:-

- Between Fair Oaks and Bracknell
- Between Hook and Oakhanger, including Lasham
- Between Dorking and Godalming
- Overhead Guildford.

The chances of a mid-air collision in all these areas is increased; but when we look at proportionate GA risk, we tend to look particularly at risk to non-participants, and the risk to the people of Guildford, both from engine failures in singles and following mid-air collision, would be substantially increased to an unacceptably high level.

Reference must be made to CAP 667, a review of GA Light Aircraft Safety. One of the recommendations reads:

9.2 (b) General aviation aircraft are being required to fly close to terrain or funnelled into corridors to remain outside controlled airspace.

It is recommended that this be reviewed by the National Air Traffic Management Advisory Committee (NATMAC).

The ACP would result in GA being both forced low over terrain and funnelled, and that consideration alone should be enough to quash it. Farnborough might argue that traffic would be given access, so it doesn't need to be forced low and funnelled, but:

- a) There is no guarantee of access
- b) New SERA laws would make access either impossible under VFR or require increased controller workload under SVFR
- c) Non radio traffic would be forced to go round the edges
- d) Some pilots, due to lack of experience or training, would choose to go round the edges. It is estimated that over 70% of private pilots choose to avoid Class D zones.

Safety of Farnborough Traffic

It is very noticeable in the ACP and from other Farnborough publications that this ACP is not about safety, it is about expediency for Farnborough traffic.

This is evidenced, for example, in an article sourced from TAG in Flight Magazine dated 4-10 June 2013, Page 22:

TAG Farnborough readies for rebound

TAG is also seeking to reclassify airspace above the airport from uncontrolled to controlled which, it says, should speed up departures and landings and reduce delays on the ground.

“Once the NATS has completed the airspace design (scheduled for year-end) we will make our application to the CAA” says Brandon O’Reilly, Chief Executive of TAG Farnborough Airport. “These projects are vital if we want to be on the front foot when the market returns”

But the same sentiments are expressed in several places in the ACP.

So, we must not think that this proposal is a question of transferring risk from Farnborough traffic to non-Farnborough traffic. This is a matter of increasing risk to other traffic solely for the financial and operational expedience of TAG operations.

Although there is an aspiration from TAG to increase its movements to 50,000 per year, there is no evidence of this growth. Current figures are much lower and showing no tendency to grow. An ACP cannot be made on the basis of aspirational growth unsupported by evidence.

Blackbushe and Fairoaks Outbounds

PPL/IR Europe has members who are based at Fairoaks and Blackbushe who are particularly concerned about the effect on departures.

It would seem that Fairoaks would negotiate a LoA to despatch aircraft directly into the Farnborough Zone, keeping them on the ground until a departure is authorised, but Fairoaks’ holding points do not allow overtaking, so there is a good chance that aircraft would be kept on the ground holding up others behind them.

We would also point out that a good proportion of the traffic being held on the ground would be turboprop aircraft, such as PC-12 and King Air, or even small turbine aircraft, whose operation is no less costly or flexible than Farnborough traffic.

But, while the Fairoaks situation would be merely inconvenient (to suit the convenience of Farnborough traffic), it seems that the situation at Blackbushe would, as well as being inconvenient and costly, be positively dangerous, with departing aircraft taking off, immediately calling for zone transit while in the circuit, and then remaining in the circuit until transit is granted. Again, this traffic would often be Bizjets and Turboprops.

The risk of mid-air collision is known to be greatest, by a considerable margin, in the circuit, so to have extra circuit traffic, with its pilot distracted by talking to Farnborough, and potentially trying to use one radio to talk to both Blackbushe and Farnborough, and potentially flying at speeds double that of SEPs, doesn’t bear thinking about.

Other Local Traffic

While Blackbushe and Fairoaks departures would be the most inconvenienced and endangered, their arrivals as well as arrivals and departures from a wide range of airfields – Redhill, Biggin Hill, White Waltham, Booker, Denham, Popham, Dunsfold, Goodwood and Lee on Solent for example – would be subject to delays and rerouting, again, for no more than the financial and operational benefit of Farnborough. We do not even address the issues at Lasham, though we have great sympathy and support for them, as they will no doubt be explaining their position in great detail.

Transiting IFR Traffic

The ACP, in many places, appears to categorise traffic into Farnborough IFR traffic and transiting VFR traffic.

PPL/IR Europe would like to point out that a substantial amount of traffic using the BIG-OCK-CPT and BIG-OCK-GWC/SAM corridors are in fact IFR transits, some exercising the right to operate in Class G under IFR and some awaiting airways joining clearance. There is such passing reference to such traffic in the ACP that we can only assume that it has either been forgotten about or ignored by Farnborough.

We are concerned about what would happen, for example, to a departure from White Waltham or Booker seeking a GWC or SAM join, Redhill or Biggin Hill departures seeking a CPT join or White Waltham, Booker or Blackbushe traffic seeking a BIG or DET join if they were not given clearance to enter Farnborough airspace. We fear that they be expected to hold outside controlled airspace in an ad hoc pattern at OCK or WOD. Such a hold would present increased risk of AirProx and mid-air collision.

We are also concerned that the focussing of Farnborough ATC resources on zone transits would be at the expense of ATSOCCAS, especially Traffic Service to aircraft in IMC.

TMZ/RMZ

PPL/IR Europe is not in a position to object, on its own members' behalf, to the imposition of a TMZ and/or RMZ, as all its members are appropriately equipped.

However, we do recognise that there are lawful airspace users who, for a variety of reasons, are unable to comply, and we support their right to continue to use airspace, and not to be excluded for the commercial gain of TAG.

Having said that, a TMZ would provide the protection that Farnborough's traffic requires, as all traffic would be visible to radar and to the aircraft's own TCAS systems, allaying any safety issues.

On balance, and with some regret towards those not equipped, and unless lobbied by them to take a different view, PPL/IR Europe would not object on its own behalf to a TMZ/RMZ covering approximately the area covered by the proposed Zone.

Environmental Considerations

The ACP's professed position on noise and emissions is misleading.

It only focusses on the reduction noise and emissions of its own traffic, which makes up a tiny part of the movements in the area, without being honest about the increased noise and emissions from aircraft it is displacing.

From a noise point of view, transiting aircraft would be flying much lower over Woking, Guildford, Godalming, Haslemere, Hindhead and Petersfield (not to mention all the villages between). These aircraft would generally be lower and slower than the Farnborough traffic which has displaced it, and would therefore expose those on the ground to a noise footprint for longer.

Furthermore, because the tracks of displaced traffic would be increased by airspace restrictions, emissions would be increased. Although transiting traffic would generally have much lower emissions than Farnborough traffic, being smaller and more efficient, there is much more of it and therefore the effect would not be negligible.

But, on a wider point, it is surprising for a company, which is encouraging and supporting the use of large multi-jet aircraft for the transport of an average load factor of little more than one passenger, to even engage in an environmental debate. While we completely support the use of personal aircraft for personal transport, if TAG's aim is to reduce noise and pollution it should put its efforts into persuading its clientele to travel by scheduled commercial air transport.

Disjoint Approach to Change Management

The management of air traffic around London is already under review by the London Airspace Management Programme (LAMP). We do not consider it wise, sensible or helpful for Farnborough to engage in a separate exercise shortly before LAMP comes to fruition.

LAMP will almost certainly release some controlled airspace to Class G, based on improved aircraft physical and navigational performance. The GA community will want to be involved in how that derestriction of airspace takes place, as well as how GA access to controlled airspace is maintained and improved.

But that needs to be in a large, strategic project, where the needs of all airspace users and all airfields and airports are considered. The Farnborough ACP only muddies the waters.

Furthermore, there is intense national debate about runway provision in the South East. There are several scenarios which increase future provision, none of them favourable to Farnborough's position, on the assumption that most Farnborough users would prefer to land at Heathrow.

A third runway at Heathrow would increase capacity to a point where Executive, Business and Private jets could be accommodated. If that runway is built instead at Gatwick, traffic would relocate from Heathrow, freeing up Heathrow availability. Of course, if the Mayor gets his way and a new airport is opened, all bets are off for all the London Airports.

Therefore, whatever the rights and wrongs of this ACP, it would be premature to take any decisions before both LAMP is decided and a decision is taken regarding the new runway; the only outcome in favour of Farnborough's position being a positive decision not to build a runway, which seems the least likely.

Infringements

Among its many other contributions, PPL/IR Europe sits on the Airspace Infringement Working Group (AIWG). The principal aim of AIWG is to reduce infringements, and it is specifically targeted on doing so. AIWG is very aware that a primary cause of infringements is complexity of airspace. The airspace proposed by the ACP is very complex. It is, to put it bluntly, a large number of infringements waiting to happen.

In themselves, these infringements would be low impact, because Farnborough traffic levels are so low, and destined to remain so, that the airspace is unnecessary; but the effort of reporting, investigating, diagnosing and providing training or enforcement action would place a burden on

NATS and CAA out of proportion to the problem, taking effort away from the zones where it does matter.

Furthermore, the complexity of the airspace is likely to increase infringements of neighbouring airspace: Gatwick, Heathrow, Solent CTRs as well as Fair Oaks, Blackbushe and Odiham ATZs and, most threateningly, Lasham's area of Intense Glider Activity.

Conclusion

PPL/IR Europe has raised a number of serious concerns, but the essential point is that this proposal transfers risk onto light GA for the sake of the convenience and economics of relatively small number of lightly loaded Farnborough based GA aircraft and is disproportionate, unfair and must be resisted.