

# GENERAL AVIATION ALLIANCE

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Partnership in Aviation

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[TAconsultation@caa.co.uk](mailto:TAconsultation@caa.co.uk)

Dear Sirs,

## **THE SECOND UK STATE CONSULTATION ON A HARMONISED TRANSITION ALTITUDE**

### **ABOUT US**

I am writing on behalf of the General Aviation Alliance (GAA) in response to your airspace consultation dated 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 organisations are listed at the foot of this page. 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 has taken input from its member organisation and this response represents their common view of the proposal. There are three matters of serious concern to our members, namely the overall effect on the availability of Class G airspace, the large height change which will often be required when crossing the FIR boundary, and the relevance of the new ASR settings in Class G.

### **Impact on Available Volume of Class G - Particularly for Cross-Country Gliding**

The altitude of Flight Level based CAS rises with high pressure, and gives important and valuable Class G airspace in best flying conditions, without worthwhile compensation in times of low pressure, when conditions are often unsuitable for S&RA flight. While this is not a matter for

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

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*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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CONOPS, we take this opportunity to remind you that the CAA have consistently intimated that a review of airspace at the lower levels could take place. There has been little progress in that area. We would be grateful if you would tell us when and how this will happen. We stand ready to assist in any way.

### **Integration with Adjacent FIRs**

The principal method of separation between IFR and VFR flights in Class G and E airspace (ie covering the whole of both the French and Belgian borders at lower levels) is by 500' level allocations. At the boundary, both IFR and VFR flights will be changing level, both in parallel and in opposite directions, potentially both up and down according to the pilot's preference.

VFR traffic often follows airway centrelines in France and Belgium, often under autopilot control. So both IFR and VFR traffic, in both directions, may be tracking a magenta line very accurately. This VFR traffic is uncontrolled and often will not be in contact with ATC. Although IFR traffic in VMC is supposed to see and avoid, it is notoriously limited in its ability to do so, and even in its understanding that it should. Only a proportion of the IFR traffic at 18,000' and below will be equipped with TCAS or TAS.

Accordingly, we forecast an increase in risk of TCAS warnings, AirProx and a very real risk of collision as a result of these level changes, as separation in three dimensions is lost because aircraft are tracking the same line in space and crossing each other's levels. Furthermore, many enroute light aircraft will be flying into and out of neighbouring states at levels above their TA, hence at flight levels, but lower than the UK TA, hence at altitudes. Because of the semi-circular rule limiting aircraft to levels or altitudes at 2000' spacing, we are concerned that they will sometimes have to change level very significantly. If there are airspace considerations preventing a small climb, a very considerable descent will be required. This will be at its worst on days of very high or low pressure, when the QNH is at its furthest from QNE. These climbs and descents are annoying and wasteful.

CONOPS must address cross boundary procedures.

### **Altimeter Setting Regions**

We fully support the removal of the current forecast Regional Pressure Settings. It adds an undesirable complexity to pilots, and directly contributes to a percentage of airspace infringements through the base of CAS. We understand that no other country in the world uses such a system.

The only reason given for the proposed Altimeter Setting Regions (ASRs) using the actual QNH of selected airports, is for determining QNH settings for en-route CAS. We submit that they are irrelevant to flight in Class G, apart from the recognised risk of infringement of CAS from below when there is significant variation of the ASR setting from the local. You have recognised the similar risk of infringement to CAS and other restricted areas at their upper levels from above when using ASR settings, and have deal with that by recommending an increased margin of altitude to be applied when far from the station giving the ASR setting. By applying this to infringements from below would enable pilots in Class G to ensure such separation without needing to use an ASR setting.

In practice, use of an ASR setting when flying in Class G will be rare and the Pilot Operating Procedures should reflect this. There is an extremely wide range of aircraft types, types of mission, and pilot experience and qualifications using Class G, but virtually all combinations of these are best served by using a QNH from a station within 50NM. Options include:

Retaining departure setting for flights returning to departure point.

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Retaining departure setting until receiving destination setting.

Using another aerodrome setting when passing en-route.

Receiving an ATSOCAS service, whether or not from a LARS station, when the aerodrome radar will be set to that aerodrome's QNH for interpreting a Mode C transponder return, and surely the ATCO would want aircraft being given the service to be on the same QNH as that of the radar.

This follows the FAA recommendation, which also recommends using a QNH from a station close to track up to 100NM away if one within 50NM is not available.

IFR flights in Class G above 3000ft are now required to be at whole 1000ft levels. This will give ample clearance from CAS above, whose base is always at the intermediate 500ft levels, except in exceptional circumstances when you propose to issue appropriate warnings. There is quite a lot of IFR flight in Class G by the large number of IR(R) pilots in addition to the IR holders. This is almost invariably conducted using the excellent LARS and other ATSOCAS widely available, and for the reasons above will not use an ASR setting except for the purpose of joining or crossing CAS when the appropriate setting will be given as part of the clearance.

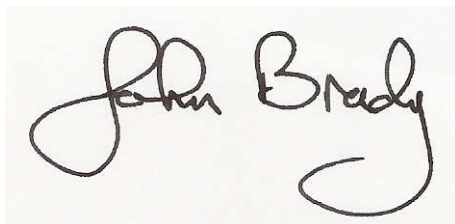
In Class G the pilots only need to know the QNH of the station they talk to; this should always be the aerodrome QNH. This should apply whatever service is being received. When not speaking to an ANSP, pilots continue on the last known setting.

The boundaries of the ASRs have no value outside the lateral limits of CAS, and should not be shown on charts.

Pilot Operating Procedures should recommend that ASRs are not used unless flying close to the base of CAS. They should not normally be given to aircraft in class G unless requested, apart from when below a TMA or when being handled by an area controller. By way of example, North Wales is nearly all contained within the Avon ASR, about 100NM from Cardiff, but aircraft there should always be using a more local QNH.

We would note that pressure altimetry is rapidly becoming irrelevant for terrain clearance. RNAV(GNSS) equipment is now very widespread in GA aircraft flown IFR, is approved for public transport, and gives height accurate for precision LPV approaches. Simpler equipment but of similar accuracy is commonly used in light aircraft, including microlights. We are surprised that the MOD seeks to retain for their own purposes forecast regional settings. The big variations from actual QNH could compromise separation in the required IFR cruising levels.

Yours Sincerely,

A handwritten signature in black ink on a light-colored background. The signature reads "John Brady" in a cursive, flowing script. The first name "John" is written with a large, looped 'J' and the last name "Brady" is written with a large, looped 'B' and 'y'.

John Brady

For the General Aviation Alliance