GENERAL AVIATION ALLIANCE

Partnership in Aviation
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General Aviation Alliance response to the Stage 1 Design Principles and Priorities for 'LAMP 2 – FASI (South) Network'

This is the General Aviation Alliance (GAA) response to the Design Principles and Priorities for the ATS Route Network managed by NERL under LAMP 2, as part of the Future Airspace Strategy Implementation (South).

The GAA is a group of organisations representing the interests of many in the UK General Aviation (GA) industry. 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.

Introduction

The GAA welcomes the opportunity to comment on the design principles (DPs) for LAMP 2, as part of the FASI (South) programme. We recognise this to be an important step towards realising the benefits of the FAS. We hope the FAS implementation programme will generally result in reduced controlled airspace volumes and better access to those volumes that remain. We also support the aims of lower noise footprints, reduced CO_2 emissions and the overall optimisation of the airspace network.

However, we are concerned that the seemingly rigid demarcation presented between airspace above and below 7,000 ft may prevent the full optimisation of airspace that the FAS envisages. We understand that ACPs above 7,000 ft may avoid the need for community consultation, however it seems likely that in the course of optimising airspace above 7,000 ft there will be a need to adapt lower airspace structures as well.

It is important that the short-term expediency of avoiding the need to publicly consult with communities on the ground, or work with other ANSPs on modifying lower airspace, does not prevent long term optimisation from being achieved.

DP0 (Golden) – *Safety is always the highest priority* – Support

We support safety being the overall highest priority. This must extend to the safety of all airspace users and the overall impact on total system safety that changes may have. For example, this must include any externalised impacts on safety outside of controlled airspace, as well as the integrity of the new airspace systems themselves. A holistic approach is key.

DP1 (High) – *Engagement: ANSP* – Support

It is important that NATS works effectively with ANSPs responsible for lower airspace, such that the most efficient airspace structures can be implemented. We find the assignment of this DP as 'high' to be at odds with the implication of the statement on page 2 of the presentation, that NATS expects airports to be responsible for lower airspace. Where appropriate, NATS should consider airspace changes that bridge the 7,000 ft demarcation, working closely with lower airspace stakeholders to achieve this.

DP2 (High) – *Engagement: Industry* – Support

It is important that NATS is engaged with other airspace stakeholders and that as proposals develop, this engagement deepens. We would welcome a real commitment to continual refinement through consultation and partnership, with a recognition that this may result in significant changes to proposals if the needs of other airspace stakeholders are not being met. This approach will increase the chances of achieving a solution that is optimised for as greater range of airspace users as possible.

In the past, despite conducting a public consultation process, many ACP sponsors have demonstrated a reluctance to significantly modify the proposals they are supposedly consulting on, or comprise in response to objections or alternatives. This must be avoided.

DP3 (Medium) – *Environmental: Minimise fuel disbenefit* – Support

We hope that most areas of the network will see efficiency benefits from airspace modernisation and optimisation. We also recognise that overall network efficiency would be the priority. There is not enough detail at this stage as to how significant the issue of disbenefits to individual routes or city pairs may be, or why NATS thinks it may arise.

DP4 (Medium) – *Environmental: No change to flightpaths below 7,000ft due to LAMP 2* – Do not support

We are concerned the use of 7,000 ft as a rigid border to the scope of this exercise will hamper the overall efficiency of future airspace structures. The best upper airspace system is of little use in isolation if the system below it remains archaic and vice versa.

In order to maximise efficiency, it will likely be necessary to modify the interface between airspace above and below 7,000 ft. While this will inevitably make the process of design and consultation more complex, it is important that lower airspace is modified as required to gain the maximum benefits envisaged by FAS.

The difficulties associated with working closely with other ANSPs (that may have different priorities or local considerations) and/or the need for greater public consultation must not stand in the way of realising the full system benefits of this 'once in a generation change'.

DP5 (Medium) – *Airspace: No increase to overall volume of controlled airspace (CAS) at and above 7,000ft* – Support (with reservation)

While the GA Alliance clearly supports the aim of no overall increase in controlled airspace volumes, we are disappointed that this principle only goes this far. It should be a design principle and aim of LAMP 2 to 'make space' for the release of CAS below 7,000 ft and

reduce above that level where possible. It is important that as use of airspace is made more efficient, the minimum necessary airspace volumes are applied.

For the VFR GA community, we hope that the implementation of FAS will allow reductions of controlled airspace, particularly the raising of existing lower limits. This also relates to our concerns on DP4 – in order to see reductions in CAS below 7,000 ft, it will likely be necessary to modify the interface with upper airspace. Once upper airspace is set, it becomes the parameters around which lower airspace has to be configured. A failure to integrate lower airspace more effectively will likely lead to volumes being larger than they need to be, which is a serious concern for the GA community.

DP6 (Medium) – *Airspace: The needs of General Aviation users will be considered, at and above 7,000ft* – Support

While the GA Alliance clearly supports a design principle that takes into account the needs of GA, we are disappointed that the DP has only been assigned 'medium' priority (whereas the MoD appear to have been assigned 'high').

It is also unclear what the DP will mean in practice and what actions will be taken to account for the needs of GA in this context. For GA VFR airspace users, the needs generally amount to:

- Reduction of existing CAS volumes;
- Improved access to those airspace volumes that remain; and
- No negative impact on safety from implementing new airspace designs.

For example, there is no mention of airspace classification in the context of the needs of GA – the extensive use of class A for enroute and higher terminal airspace effectively means large areas of the UK are off limits to VFR traffic. Use of classes B-E would represent a more reasonable balance between the needs of different airspace stakeholders, particularly for the GA community. We note some states manage their entire network with class C being the highest classification, thereby enabling VFR access.

For GA IFR users, the need is to ensure that aircraft of lower performance profiles than jet transport (and with typical cruising levels between FL100 and FL250) are still able to operate without impediment. We also seek clarification regarding RNAV1, which is addressed at DP9.

DP7 (High) – *Airspace: The needs of MoD airspace users will be considered, at and above 7,000ft* – No objection

We have no objection to the needs of the MoD being a high priority DP but query why the DP for the needs of GA is only medium.

DP8 (High) – *Modernisation: No constraints to efforts made to systemise the network, for capacity* – Support

Clearly this is a key deliverable of the FAS, but would emphasise the comments made earlier about the rigid demarcation of 7,000 ft.

DP9 (High) – *Modernisation: RNAV1 would be the minimum navigation standard* – Seeking clarification

We have no objection to the use of RNAV1 as a design criterion for new routes and procedures. However, we do not support mandatory RNAV1 approval for entry into the relevant airspace for all IFR flights.

It should be possible to accommodate a low volume of IFR traffic, that is not RNAV approved. This is particularly relevant for GA IFR aircraft operating in and out of secondary airports or GA airfields in the south east of the UK. While presumably an important aim of LAMP 2 is to reduce ATC intervention in aircraft flight paths, the option of tactical vectoring, to facilitate a low volume of non-RNAV1 approved aircraft, should be retained.

Many IFR GA aircraft flying in the relevant airspace will be RNAV1 equipped by the likely time of implementation of LAMP 2, so we emphasise that it is not anticipated that large numbers of non-RNAV1 approved GA aircraft will wish to use the relevant airspace. However, we would not wish to see non-RNAV1 approved aircraft unnecessarily disadvantaged.

If it is the intention of NATS to seek an RNAV1 airspace mandate, we would suggest this is made clear, along with the precise areas of airspace it would apply to. Should this be the case, we recommend further discussion on the subject.

We would also be interested to know to what extent the use of RNAV1 design criteria might allow lower route and procedure containment margins within controlled airspace than is currently the case.

Concluding comments

For most of the GA community, the priorities are reductions of CAS volumes and better access to those areas that remain. While much airspace that restricts activity is found below 7,000 ft, release of higher CAS is also welcome and important to activities such as soaring by unpowered aircraft, aerobatics or long-range VFR touring.

It is difficult to understand at the DP stage what opportunities may arise from this work to further the interests of GA. More detailed discussions around the proposed concept of operations and possible reconfigurations of the airspace would be required to gain a better understanding. The GA Alliance would welcome focus group participation (or similar detailed engagement) to better understand the issues.

The point about reconfiguring the upper airspace structures, such that the ‘lid’ can be lifted lower down, cannot be stressed enough. A modern motorway network would not be built without consideration of how and where roads would join it – the same goes for airspace.

The GA Alliance does recognise the strategic difficulties inherent in bringing diverse airspace stakeholders together to achieve network optimisation. We are concerned that currently there is no single body or authority accountable for doing so. While we welcome LAMP 2 overall, it must be part of a wider strategy to optimise lower airspace, with appropriate powers, responsibilities and accountabilities assigned to ensure this is achieved.

Edward Bellamy
On behalf of GA Alliance