

## **An account of the NATS / TAG presentation at WW on Wednesday 26<sup>th</sup> March written by John Russell**

About 100 pilots listened avidly to the presentation from Dan Foster (GM ATC Farnborough) and Neil Turner (Manager ATC Ops & Training). Marked in their absence was any representative from TAG - leaving the ATC visitors as the "fall guys"!

In a rather poor presentation - not all their fault - we were shown a (far too small) radar video of the typical problems they experienced with handling just three IFR inbounds. Their need was to create a "predictable environment" where the (legal) movements of GA aircraft do not surprise them and result in reduced separation to these flights, which are usually in receipt of a Deconfliction service.

They explained the rationale of the various individual proposed airspace areas and the latest update to their plans. This now includes a Radio Mandatory Zone which effectively blocks the airspace south of Fairoaks down to the Gatwick CTA. This was not included in early versions of the Consultation Paper, so those responding early did so without the full information!! Thus there is no access for non-radio aircraft to route East - West between LHR & LGW CTA's.

This served as an example of modifications to their ideas which are not mentioned in the Consultation paper. In the course of the evening they proposed various changes to assist GA traffic such as decommissioning D131 (which had only been activated once in ten years); reshaping Oakhangar HIRTA to reflect its proper need; and providing a North - South Free Lane for transit traffic, possibly with a dedicated frequency.

All this was new and would, of course, be attempted to be implemented after the airspace had been approved!

Dan also exhorted us to canvas the CAA to ensure that the new airspace would be fully monitored to ensure that it was providing proper access and service to all traffic. Once again it was "jam tomorrow" but this time with an added formation of pigs overhead, if one assumed that GA could move the CAA and get airspace reductions downstream.

There followed a very lively Q&A session which was basically responded to by "we hear what you say", but such views need to be reflected in our submission to the Consultation. One very informed listener asked how these proposals were going to be implemented with the new EASA changes to VFR height and visibility restrictions, and flight plan requirements, under the Standardised European Rules of the Air (SERA).

The response to this was that the CAA were attempting to get a Derogation to this Rule Change and the success of this had been assumed by TAG! Further pressing of the situation if a derogation was not granted produced the answer that they would delay airspace implementation until the situation was resolved.

One again these potential problems/solutions were not mentioned in the Consultative document, so one was commenting on incomplete information when sending in a response!

I left the meeting more confused than I arrived, but still convinced that this was indeed a "Grab" that would only be influenced by a large protest at this stage. I shall be responding personally to the Document, but not answering their leading questions as the information they are based on is not the same as was presented to us.

I urge you all to put in your "twopenny-worth" before the deadline of the 2nd May.

## **Submission in response to the TAG Consultative AC on Farnborough Airspace Proposals by John Russell**

I have read the whole document and attended a pilot briefing from Farnborough ATC at White Waltham. I am a General Aviation stakeholder who utilises the proposed CAS area on a regular basis.

First – I have a problem with the Airspace Consultation process (which will be referred to from now on as “AC”), as the document continues to be amended since its first publication. Thus any comments submitted before such modifications may have been based on false assumptions, which would make any conclusions drawn later to be suspect.

Similarly, the questions asked within the AC are also compromised by modifications to the text to which they refer. Therefore the responses to these questions are of little statistical value. I also have a problem with the concept of asking official questions as it is extremely difficult to produce questions without skewing them towards providing the answer that is required.

In view of this, my response submission deliberately does not reply to the questions posed within the AC.

### **A: THE PERCEIVED NEED FOR CHANGE**

Much emphasis in the AC refers to the need for change now. I question this rationale on four counts:

#### **1) FUTURE TRAFFIC LEVELS**

The premise of the forecast amount of traffic is not borne out by history.

#### **2) PRIVATE VERSUS PUBLIC TRANSPORT**

The type of traffic referred to by TAG is essentially General Aviation (GA), albeit operating on Instrument Flight Rules (IFR) Flight Plans, and has no divine right to protection by the introduction of a new and complicated conglomeration of Controlled Airspace (CAS), to the detriment of the many other GA users of this area.

I have found no definition of “GA” within the AC, and it is notable that the writers have distanced “Farnborough traffic” from “GA” in all but one reference that got missed in the proof-reading: in Part E, para 2.4, there are two mentions of “other GA traffic”, indicating that Farnborough traffic is also GA.

Whilst ATC must provide a separation service for IFR traffic, we know that this traffic must provide its own separation outside CAS. Farnborough ATC will always provide the required separation if IFR aircraft are under their radar control, but to do this they may have to radar vector traffic around other traffic. This results (amongst other things) in delays for TAG customers. This is one of the most important drivers for change rather than the lauded environmental benefits of dispersing tracks.

It is understandable that ATC want CAS to make their task easier and more predictable. Yet producing a proposed large area of CAS with differing base levels (and possible movable lateral limits), restricts a much larger number of aircraft movements in the area than the relative few that it benefits.

### 3) CHANGES ELSEWHERE

The timing of the proposal is wrong as the current London Airspace Management Proposal (LAMP) is still formulating major changes to airspace adjoining the Farnborough area. Despite TAG saying these have been incorporated in their Proposal, there is no guarantee that TAG's current plan will suit the final LAMP plan.

### 4) EUROPEAN RULE CHANGES

Much of the platitudes proposed for the non-TAG GA community is provision of Visual Flight Rules (VFR) clearances through the new airspace. Part E offers the two scenarios where the Standard European Rules of the Air (SERA) will be applied at the end of 2014. One important change is the definition of the minimum weather conditions for VFR flight. Now aircraft have to be 1000 feet below the cloudbase rather than 500 feet below it, or clear of cloud and in sight of the surface.

Under certain cloudbase conditions, ATC will no longer be able to issue a transit clearance as they will be unable to ensure suitable terrain clearance and also comply with the new vertical distance requirement from cloud. A Special VFR Clearance might resolve the situation, but these can have a detrimental effect on Farnborough traffic flows and so cannot be guaranteed to be available for GA. Thus the imposition of extra CAS will have a detrimental effect on other GA users transiting the current Class G airspace.

TAG say that the CAA are seeking a derogation from EASA for this Rule Change, but such a derogation is not guaranteed – hence the two scenarios on Pages E33 & E34. They say that they will delay any implementation until the result of the CAA appeal. Such a delay further compromises the validity of any statistical conclusions drawn from the responses to the AC that were received before the result of the CAA appeal.

Another amendment included in SERA is the requirement to submit a flight plan before operating, if any ATC service is to be used. Thus any planned transit through the extensive proposed CAS will require filing a flight plan before departure, this being another side-effect of creating more CAS to the detriment of GA pilots. This further restriction on recreational flying will drive some of the potential traffic away, once again assisting with TAG's aim of reducing the possible conflict with their traffic. This problem is not mentioned in the AC.

## **B: PROPOSED SOLUTIONS FOR GENERAL AVIATION**

### 1) SUPPORT THE CHANGES AND WE WILL HELP YOU AFTERWARDS

The AC contains many references to the possible effects on GA but makes few attempts to quantify them. For example Part B, 3.4 contains the phrase:

“... and considering GA activity areas as far as practicable, making airspace more efficient for as many users as possible.”

Those fixes that are proposed are conditional in that a Clearance must be sought, with the implication that it could be refused. This feeling is reinforced by the language in Part B.5.4 which states: “If ***requested***, we ***could*** give these light GA aircraft a shortcut between east and west (or vice versa).” [My italics.]

With such a great swathe of proposed CAS, such a refusal will have large flight planning implications as it will result in a long route diversion. These implications are the need to plan for the extra fuel required and possible flight into worsening weather by the need to route well to the west of the original route.

At the Pilot Briefing by ATC, proposed solutions included a transit “Free Lane”, possibly with a dedicated frequency; the deletion of a little-used Danger Area (D131) and the reshaping of a High Intensity Radio Transmission Area (Oakhangar) to properly suit its activity. The last two proposals are not mentioned in the AC.

Unfortunately these offerings were “jam tomorrow”, as they were only going to be promoted after the new CAS was implemented. Such promises do not impress pilots as the track record of success in reduction of new airspace areas is extremely poor. (A classic example of this is the Norwich CAS, the size of which is unrealistic for the current traffic flows, yet remains its original size.)

At the Briefing, the ATC presenters exhorted all GA pilots to request that the CAA monitor any new CAS to ensure it was fit for purpose. Placing the onus on users to change something after it had been enshrined in legislation is unfair. I consider this to be an abrogation of responsibility as the CAA should have gone through this process meticulously itself before approving a new CAS application.

### 2) PROPOSAL FOR A RADIO MANDATORY ZONE

The AC contains a proposal for a Radio Mandatory Zone (RMZ) to fill the airspace between the LHR and LGW Control Areas (CTAs) stretching between Fair Oaks and Guildford. This proposal would have been missed by early respondees as it was inserted into the AC after initial publication.

The immediate effect is a block on east – west transits of the London area by non-radio aircraft. These aircraft are already restricted to avoiding CAS, so they will have no alternative but to extend their route by many miles in order to route further south around CAS.

Almost, by definition, non-radio aircraft are simple and/or vintage in design and do not have large fuel tanks. Thus large track diversions to avoid the proposed CAS, could make some transit flights impossible without a technical stop.

### 3) FUNNELING OF TRAFFIC

TAG agree that any expansion of CAS will tend to funnel traffic into the smaller areas of Class G airspace between CAS. The AC acknowledges this, yet does not fully address the problem. It acknowledges that VFR traffic is very 'peaky', occurring mostly during daylight hours, on good weather days and especially at weekends. At these combined peaks the amount of traffic that will route around any new CAS will be far higher than the average usage. Add to this the reduction in available Class G airspace volume by placing CAS overhead, and the possibility of collision is greatly increased in these funnels.

ATC Representatives also acknowledged that infringements of CAS would increase, due to pilots' collision avoidance action and the complexity of the many different CAS bases being proposed.

Apart from the safety ramifications of any Airspace Infringement, the individual VFR pilot may end up being prosecuted by the CAA. This situation would be directly the fault of TAG. Similarly, should any mid-air collision occur below the new airspace, it would be the fault of the pilots, not those who created the conditions that enabled the accident.

### 4) BASE LEVELS OF CTAs

TAG's design of the requested CAS produces fourteen different CTAs, which can have four different bases, viz.: 1500, 2500, 3500 & 4500 feet. Any planned west-east route to the south of Farnborough, underneath the proposed CAS would be limited to a maximum of 2400 feet. In practice most pilots prudently allow a 500 foot buffer for a cruising altitude below the base of any CAS. This means flying at a maximum of 2000 feet.

Terrain to the north of Haslemere rises to nearly 900 feet. Current London CAS would permit a transit at 3000 feet (with a 500 foot buffer) until approaching Guildford. This 1000 foot difference in available flight altitude means reduced terrain clearance and less options in the event of an emergency. The resultant noise footprint will also be larger.

The noise levels generated by GA as a result of this proposal are deemed by TAG to be too difficult to predict and so are dismissed. Yet we are told that an estimated 464,000 people will no longer be overflown by aircraft between 4000-7000 feet on new proposed entry routes into Bournemouth (part D.3.6). The annoyance level of a jet on descent at 4000 feet is a lot less than a small aircraft with cruise power set, flying overhead at 1000 feet or less.

Any proposed new CTA, should be examined for its effect on underflying traffic.

## 5) GATWICK NORTHWEST CORNER 'SLIVER'

The proposed small triangle of LGW CTA proposed to be released may provide a small corridor, and the inevitable funnelling, for passage from east to west and vice versa; but will be inaccessible to non-radio aircraft due to the blocking lateral limits of the RMZ.

## 6) OTHER STAKEHOLDERS' ABILITY TO CARRY OUT TASKS

Creation of swathes of airspace across currently used areas of Class G airspace has financial and practical ramifications for other stakeholders. Either they must curtail their activities or fly to other areas to complete their tasks. Gliders in particular will suffer from operational difficulty when attempting to transit the CTA's with lower base limits.

For example CTA 1 produces little benefit in practical terms for TAG operations, but has a large effect on those operators that use this area for training and aerobatics. Once again, applying a prudent buffer of 500 feet below the CAS reduces or destroys the ability for certain training and aerobatic exercises to be safely performed. These stakeholders will have to fly to other areas not so constrained, resulting in an increase in cost due to the extra time spent and fuel burnt.

Similarly, CTAs 11, 12, 13 & 14 to the south will restrict large training areas, as well as creating restrictive CAS over the Isle of Wight for some aerobatic and other training.

Apart from the Isle of Wight proposal, all the other CTAs will appear on the 1:250,000 and 1:500,000 aeronautical charts, making them confusing to read and overcomplicating flight planning for many student or low-time pilots.

Some of these pilots trying to plan cross-country flights across the area will simply give up and fly to a different destination; thereby helping to achieve TAG's aim of reducing conflict with their IFR traffic.

## 7) PROPOSED VFR TRANSIT ROUTES

This proposal does not seem to be mature in that the AC can only offer finite solutions post-consultation, such that pilots are responding to TAG's initial thoughts, rather than well thought out plans.

The suggested crossover point between transit routes from all cardinal directions, in the Cove and North Farnborough built-up areas must be a major concern. There would need to be 500 foot clearance between aircraft flying in different direction. Thanks to the general low level of terrain east - west, the minimum altitude possible would be 1100 feet. Opposite direction would have to be 1600, with north - south and vice versa taking 2100 & 2600 feet respectively.

Whichever combination is used, Figure B11 (pink area) shows TAG traffic inbound to Runway 24 from the south to be between 2000 and 3000 feet. This will cause conflict between the arrivals and transit flights. The inevitable result of this possible conflict is a refusal to permit use the Transit Routes without restriction.

Thus this proposal is not the 'solution' to deliver safe and workable transit lanes.

## 8) THE FAIROAKS CORRIDOR

The proposed loaning of London CTR airspace below 2000 feet to the northeast of Farnborough will undoubtedly assist in providing access to Fairoaks from the west, but does not replace the current Crowthorne to Guildford channel of Class G airspace. Permission will have to be obtained, perhaps only under Special VFR Rules, which cannot be relied on as being granted. The flight planning ramifications of a refusal have already been highlighted. The application of a RMZ to the south of the proposed Fairoaks corridor still prevents non-radio flights access east to west and vice versa.

## CONCLUSION

Providing a comprehensive AC paper is very impressive, but modifying it downstream dilutes any inferences that might be drawn from the responses received.

It would have been better to vet the responses from a definitive document and then produce an amended Proposal that incorporated stakeholder feedback and details of developments and changes made since the original document. Stakeholders should then be invited to re-submit their further comments (if any) in the light of the changes.

Similarly, creating a complex collection of new Controlled Airspace whilst a revue of surrounding existing CAS is taking place reduces the credibility of detail within the proposal.

Open questions in the body of the AC can be helpful in analysis of the responses, but the questions are often 'leading' or presume a certain situation and so have little validity.

The AC recognises and highlights many problems the proposal will cause for other airspace users, but offers conditional solutions and vague wording such as "as far as practicable", which carry no assurances, or define what is practicable. On the other hand, the only definitive solutions tabled are those that provide for their minority interest group.

Any alleviations proposed to accommodate other GA have strings attached, with TAG Farnborough ATC maintaining the power of veto. This can create doubt whether successful navigation through the general area can be achieved. It will result in some traffic not bothering, and other traffic being funnelled through ever smaller choke points. The consequence of this funnelling is a reduction in air safety in the areas adjacent to and underneath the proposed Controlled Airspace.

For the above reasons, I am strongly opposed to the Proposal as published.

Captain John W. F. Russell.

7<sup>th</sup> April 2014.

### **Lasham's dicussion document circulated to its members**

1. TAG Farnborough's current operations are exclusively focussed on business aviation. TAG Farnborough claims that the most likely increase in its bizjet traffic will be a return back to levels seen in around 2007 when it was demonstrably able to handle these safely. In fact its movements have been slowly declining since this 2007 peak. It has provided no commercial or other reason why Farnborough traffic should suddenly and continuously start increasing.
2. There have been very few airprox indeed in the Class G area to be converted into Class D by TAG Farnborough's proposed airspace. Thus, turning Class G into Class D cannot in practice make the airspace any safer.
3. An enormous amount of airspace has been requested to move a small number of bizjet passengers. This is massively disproportionate given the small amount of traffic movements and low passenger numbers involved. No scheduled flights for fare-paying passengers are involved. Farnborough is asking for around 2000 times more airspace for each of its business passengers than, for example, Gatwick uses per passenger for normal scheduled flights.
4. TAG Farnborough claims that its traffic will remain higher and create less noise. In fact, the airspace requested is lower than the present TMA airspace. Since they have requested it, they presumably intend to use it. That means that Farnborough traffic will fly lower, use more power and be noisier, as well as creating more CO2 because of the extra fuel burnt. Under present arrangements, TAG Farnborough's bizjet movements spread noise thinly over a large area. Its proposed airspace and associated procedures will increase noise regularly under the fixed tracks that they propose and significantly affect the communities living under them. Significant irritating noise will also be generated by the large percentage of GA power traffic that will choose to skirt around TAG Farnborough's proposed Class D and affect the communities underneath these tracks.
5. TAG Farnborough's proposed Class D airspace makes the remaining Class G airspace significantly less safe for other airspace users. This includes powered GA traffic and gliders, and specifically Lasham gliders.
6. Lasham, which is world-class and probably the largest gliding aviation centre in the world, will have its operations severely limited by TAG Farnborough's proposals. In particular, the positioning of Class D airspace some 880 feet above the ground one mile to the east of runway 27's threshold plus the creation of funnel choke-points for all GA traffic to the west of Lasham will severely restrict many aspects of Lasham's activities. Training will be severely affected, grid launches will become more dangerous as multiple gliders will have to migrate to the west of the airfield into funnelled GA traffic. Short tight circuits will have to take place, which are inherently more dangerous, and low performance training gliders will find themselves pushed downwind in easterly wind conditions, increasing the risk of not getting back safely to the airfield. Early solo pilots will find themselves flying in areas where the overflying of GA traffic will increase the risks of airprox incidents or accidents. Getting to and from the South Downs will become much more problematic.
7. The result will be that many pilots will conclude that the nearby airspace is limiting and intimidating and that Lasham has become a much more dangerous place from which to fly. They will therefore leave to join other clubs. The Olympic airspace and what happened at Lasham during its imposition has demonstrated that this is not theoretical. This means that Lasham will lose several hundreds of thousands of pounds per annum in revenues and become unviable in its present form. Indeed it may become completely unviable. This would effectively lead to the loss of the several hundred jobs directly and indirectly linked to Lasham airfield.



## **From Stephen Slater, Chairman Vintage Aircraft Club**

### **Attention all Vintage Aircraft Club members.**

As mentioned in the last issue of Vintage and Classic magazine, TAG Aviation, who own Farnborough are attempting to have a very large area of airspace in Southern England reclassified as controlled airspace. Their bid is disproportionate and unnecessary, and would only benefit a very small percentage of users of this airspace - and no doubt TAG's profit margins.

If it were to go ahead it would effectively block a huge swathe of air space to VFR and non-radio, and likely, non-transponder traffic. This will particularly affect the gliding community with Lasham, the world's busiest gliding site, effectively rendered unviable were this 'grab' to go ahead.

Even if you are based far from the south of England, do not think that this is "not your problem". Whilst it may not affect you directly, we are still asking for you to get involved. We believe that a number of regional airports are watching the outcome of this ACP very carefully. If Farnborough succeeds in obtaining large volumes of new controlled airspace, we expect a number of applications for new controlled airspace from other airports. One of these may affect you.

Best regards

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### **Link to discussion on Flyer web forum**

<http://forums.flyer.co.uk/viewtopic.php?f=1&t=88047>