

## **Detailed Consultation Response from the Light Aircraft Association**

### **RECLASSIFICATION OF THE GLASGOW CTA - REVISED PROPOSAL**

#### Introduction

1. This paper sets out the LAA response to the amended proposal to reclassify the vast majority of the Glasgow CTA from Class E to Class D. The LAA recognises the importance of safety in public transport aircraft operation. Where there are substantial public transport movements at an aerodrome we support the establishment of Class D airspace but we expect the needs and safety of all airspace users to be taken into account and appropriate airspace design and mitigation applied. The LAA has reviewed the amended proposal and looked particularly at risk, the environment and the effect of the proposal on non-commercial operations.

2. As before we agree that Glasgow should be able to operate its public transport flights within Class D airspace but this should not be to the exclusion of other airspace users from areas where public transport flights have no requirement to be. We therefore examined the amended proposal to see if it addressed the needs of all other airspace users as required by CAP 724 and 725.

#### Non-Consultation With Stakeholders

3. We note that Appendix A of the amended proposal contains a list of stakeholders consulted under the original proposal but none of these are noted as having been consulted about the amended proposal. The implication of this is that there has not in fact been any consultation as to the amended proposal and that any responses will come from those who found out about it from other sources. We consider this to be contrary to the Cabinet Office's Code of Practice on Consultation and the guidance contained within CAP 725 which must call into question the validity of the process.

#### Errors And Misleading Data In The Original Proposal Not Addressed

4. We found a number of significant errors and misleading statements in data presented in the original proposal which we listed at paragraph 3 of our original response. We are disappointed to note that the opportunity has not been taken to address these in the amended proposal which, we suggest, calls into question the validity of the amended proposal.

#### The Amendments

5. The proposed revised higher bases in areas 1, 2, and 3 as shown in Figure 5 of the amended proposal are welcomed although we would suggest that the base of the Class D proposed for areas 2 and 3 at 3,500ft would benefit from being further raised, or returned to Class G, and would question whether there is any requirement for public transport flights to be at that level so far from touchdown. Neither arriving nor departing aircraft should be anywhere near that low if they are to operate efficiently and minimise nuisance and laying claim to this volume as Class D suggests that you intend to force public transport aircraft to fly inefficiently, something airlines would oppose.

6. Similarly the area shown as Area 1 in Figure 4 of the amended proposal, lying to the north of the central portion of the CTA is shown by the diagrams showing typical vectoring patterns in the proposals to be virtually unused by public transport flights and could easily be released to Class G. For example the vectoring diagram at Figure 6 in the amended proposal shows traffic on 28 June 2008 (one of the busiest days of the year, rather than a typical day) yet barely a dozen flights are shown as entering a small part of it with the rest being completely unused.

7. Rather than simply raise the base of the proposed Class D airspace slightly we would again urge you to carry out a full analysis, so as to determine what best suits the requirements of all airspace users but you have dismissed it without due consideration.

#### Impact On Other Airspace Users

8. From the viewpoint of the non-commercial pilot, the amended proposal will still cut the Highlands off from the south for many aircraft. No improvement in service to permit crossing of controlled airspace is offered and many aircraft will in any case be unable to obtain or accept a clearance. Weather, wind and terrain will still make VFR flight under the CTA difficult and we cannot recommend the operation of light aircraft close to mountainous terrain in strong winds. Terrain below the CTA is significant and an engine failure at low level is unlikely to be survivable. A detour via the west or east coast is long and hazardous and flight over the sea is equally unattractive. The amended proposal therefore still results in a significant impact on non commercial aircraft and this should be addressed. In particular the safety of flight resulting from the proposed change must be addressed for all stakeholders.

9. The amended proposal will also still cause difficulties for gliders, para-gliders and other very light flying machines which need to follow the energy whilst maintaining a high altitude to ensure safe crossing of inhospitable terrain. This they will no longer be able to do as because they cannot maintain a constant altitude it is unlikely that they would be given a clearance to enter such a large area of Class D airspace.

#### Environmental

10. As with the original proposal the amended proposal suggests that to observers on the ground the amended proposal will not affect where aircraft fly. This is untrue as substantial numbers of aircraft which currently use the CTA will still be forced to fly lower increasing noise and intrusion as well as the risk to persons and property on the ground. It is still our view that DAP was wrong to agree that no environmental consultation was necessary.

#### Conclusion

11. We still conclude that seriously misleading data related to traffic levels and routing of public transport aircraft using Glasgow airport have been used to justify the proposed change - both in its original and amended forms. This has been used to propose a safety change where there has never been a loss of ATC separation let alone a risk bearing airprox. No attempt to consider or mitigate the effect of the proposal on other airspace users has been made and proper alternatives have not been considered. You dismissed changes to possible airspace boundaries without consideration and using false logic but have then proposed a change which, though welcome, still does not facilitate safe VFR transit and calls your consultation further

into question. Although you have three times the CTR volume of Gatwick with only one third of the relevant movements you propose to increase your class D airspace by almost another third. The negative environmental and safety issues that would result from your proposal have not been considered and there has been no consultation with environmental stakeholders.

12. The LAA, having previously spent considerable time in analysing the issues presented, studying the airspace and traffic levels and further reviewing these conclusions in light of the amended proposal, still conclude that there is a large volume of CAS around Glasgow that is not currently needed or used. It may be that part of the CTA is needed as class D but it is clear that parts of class D could be returned to class E or more likely class G. This suggests that the central Scottish terminal airspace should be subject to a top down review. The allocated CAS needs to be necessary and sufficient for the task, but no more, and that is clearly not the case. Therefore a full review of the central Scottish terminal airspace remains a valid alternative which should be considered. Perhaps the outcome of your consultation should indeed conclude that such a review should be conducted. We stand ready to participate in any way we can to help such a process and have already proposed a discussion with Glasgow to create a proposal for the Release of Controlled and Segregated Airspace in accordance with the DAP's statement dated 23 August 2010.

Light Aircraft Association

24 April 2011