

GENERAL AVIATION ALLIANCE

Partnership in Aviation

President: Air Chief Marshal Sir John Allison KCB, CBE, FRAeS RAF(rtd)

Vice President: The Lord Rotherwick

Chacksfield House,
31 St Andrew's Road,
Leicester, LE2 8RE

Email: facilitator@gaalliance.org.uk

Web: www.gaalliance.org.uk

28 December 2013

Airspace Policy Coordination & Consultation Section
Safety & Airspace Regulatory Group
CAA House
45-59 Kingsway
London
WC2B 6TE

Dear Sirs,

DONCASTER AIRPORT POST IMPLEMENTATION REVIEW - RESPONSE BY THE GAA

I am writing on behalf of the General Aviation Alliance (GAA) in response to Information Notice 2013/176 concerning the Post Implementation Review of the controlled airspace established at Doncaster Airport on 28 August 2008.

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 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.

ABOUT OUR RESPONSE

The content of this document has been collated from inputs from the member associations, from aviation clubs and individuals. It has been agreed by the members of the GAA. Individual associations may also submit responses to deal with issues specific to their operation.

DONCASTER AIRPORT CONTROLLED AIRSPACE

The Efficacy of the Controlled Airspace

At the time of the consultation, we were told that "the existing GA and military operations together with the existing and planned traffic levels of the Airport merit the establishment of the proposed Class D airspace". Local users were also briefed by the Manager, Air Traffic Services that "the requirement for controlled airspace was not based on current levels, but on estimated expansion of future movements". In paragraph 1.3.2 the consultation states "the passenger numbers for the first 12 months of operation were 840,000 and rapid growth is forecast for future years. Indeed, by the end of 2007 the numbers are predicted to be approaching 2 million and this is anticipated to double by the end of 2010". So we expected 4 million passengers by

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

*British Parachute Association
Royal Aero Club of the United Kingdom
Helicopter Club of Great Britain
Light Aircraft Association
European Association of Instrument Rated Pilots*

GENERAL AVIATION ALLIANCE

Partnership in Aviation

2010 and on the same growth rate 5.4 million by 2012 but traffic levels as reported by the CAA are much less, only 693,000 in 2012. At Annex A we attach graphs depicting this decline in Doncaster traffic.

In the light of this fundamental difference in the nature of the operation we question if the airspace is performing the function for which it was established. We believe that it will be necessary to bring about changes to the airspace structure in accordance with CAP725 section 59.

Access

Powered Aircraft

During the first year of operation the LAA was telephoned by Doncaster ATS concerning a fly-in which was planned for an airfield outside the CTR over a summer week-end. The LAA was asked to advise participating pilots to plan to avoid the CTR/CTA because crossing clearances would not be given due to controller limitations. There have been no recent reports to GAA organisations of issues with powered aircraft gaining access to the CTR/CTA and pilots have complimented the ATS unit on the service provided.

Had the traffic levels reached the level proposed in the consultation this airspace would be busy with CAT and other airspace users might have had difficulty with access but with CAT traffic now only some 25% of that forecast the airspace is little used for its intended purpose; it is a largely empty space. Because of that access for GA powered aircraft is good. However, although access is available on request, the CAS does have a negative impact on flight operations well beyond its boundaries. Aircraft intending to enter the CAS have to make a request at least 10 minutes before entry in accordance with UKAIP 1.6.5. For aircraft flying at 90 kts this equates to 15nm and for 120 kts to 20nm. Over this area stretching from Huddersfield to Grimsby and from York to the East Midlands CTR, pilots have to be in contact with Doncaster ATS, filing an abbreviated flight plan and obtaining clearance. This complex area covering some 10,265 km sq is busy with aerodromes, airspace restrictions and mixed civil and military traffic so GA aircraft should "aviating and navigating" rather than "communicating" administrative arrangements needed to enter an area which has a traffic density much lower than the surrounding area.

Within the area, the effect of the CAS is to concentrate GA traffic into the remaining airspace particularly between it and the R313/MATZ clutch to the east. We do not have hard data on this effect for aeroplanes and helicopters but it is available for gliders.

Gliding and Soaring

As is usual in ACP consultations, Doncaster offered access on request for VFR traffic but because of the difficulty in communicating and the inability to maintain a level or necessarily follow a clearance, aircraft which rely on the energy of the atmosphere for their motive power are rarely able to enter CAS.

This is captured well by the data record from the BGA ladder of cross country flights depicted in Annex B. Figure 3 shows the distribution of tracks in the 8 years leading up to the establishment of the CAS and Figure 4, the 5 years after. Note that the colour shading depicting traffic density is to the same scale in both figures but the increased use of the ladder in recent years results in 3 times as many tracks being depicted after 28 Aug 2008 as before. The route of the main traffic flow has been concentrated and moved east by the Doncaster CTR which is clearly seen in outline as an area of lower glider traffic density.

Each local gliding club had many more movements than Doncaster Airport and it appears that the allocation of airspace is not properly balanced:

GENERAL AVIATION ALLIANCE

Partnership in Aviation

- a. On the east side the CAS has produced a "squeeze", forcing all gliders and most GA traffic into a narrow corridor between the Class D and the permanent D313 Red Arrows practice area considerably increasing the probability of conflicts.
- b. By lowering the airspace under L975 from FL55, to 4000' and 4500', it has made it much more difficult for pilots to fly between Derbyshire and Yorkshire. Again a narrow corridor is formed between the long established Leeds/Bradford Class D, and RHDS, forcing most GA traffic into it, causing the probability of conflicts.
- c. Although there are letters of agreement for access and transit, and of course the standard Class D procedure, the CAS has stopped gliders using a vast area for thermal soaring.

Hang Gliding and Paragliding

The CAS has severely limited hang gliding activities in an important area. LoAs have only done a small amount to mitigate this as they do not release sufficient volumes of CAS to meet the needs of this sport. Safety has been markedly lowered through the creation of a series of new choke points demanding significantly higher levels of pilot effort being focused on remaining airborne. Specific impacts on hang gliding and paragliding clubs in the area are:

- a. The amount of airspace freed up by the LoAs does not reflect the performance of the modern airliners using RHADS and leaves in place airspace to cater for events that will occur only very rarely.
- b. The take-off location at Curbar Edge has largely fallen out of use for paragliding due to the presence of the RHADS controlled airspace,
- c. Access to the LoA corridors has sometimes been refused "due to equipment maintenance". It is difficult to see why equipment maintenance should render either LoA inoperable. The LoAs state that:
 - i. *"The Doncaster Radar Controller will activate the UPTON\WORKSOP Corridor, by ensuring that IFR flights are vectored clear of the affected airspace and VFR flights are issued appropriate traffic information on the glider operations."* This provides procedural separation so there appears to be no need to be able to offer radar separation to IFR traffic.
 - ii. *"For the UPTON\WORKSOP Corridor to be activated, Doncaster Radar must be capable of providing a radar service using either primary or secondary radar or a combination of both."* Unless there were times when both radars were under simultaneous maintenance, which is extremely unlikely, this refusal should not have happened.
- d. Access to the LoA corridors has sometimes been refused due to the opposite runway in use for the corridor due to differing winds at the airport and on the hill. It would seem very unlikely for the winds to be significantly different and a runway change could well have been possible thus permitting better airspace sharing.

CONCLUSION

It is clear that the Doncaster CAS has not been used for the purpose stated in the documents seen by us. The CAT traffic has failed to materialise and the airspace is largely empty. Its

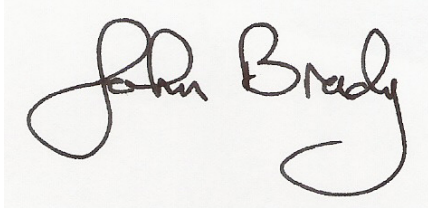
GENERAL AVIATION ALLIANCE

Partnership in Aviation

presence has had a significant impact on GA stakeholders, restricting their operation for no particular benefit to Society.

We would be grateful if you would acknowledge receipt of this document.

Yours Sincerely

A handwritten signature in black ink on a light background. The signature reads "John Brady" in a cursive, flowing script. The first name "John" is written with a large, sweeping initial 'J' that loops back under the name. The last name "Brady" is written in a similar cursive style with a large, sweeping initial 'B'.

John Brady

For the General Aviation Alliance

Please address any response to The Facilitator facilitator@gaalliance.org.uk

Annexes:

- A. Doncaster Airport Traffic Levels
- B. BGA Cross-Country Glider Routing

Annex A

To GAA Report

Dated 28 December 2013

Doncaster Airport Traffic Levels

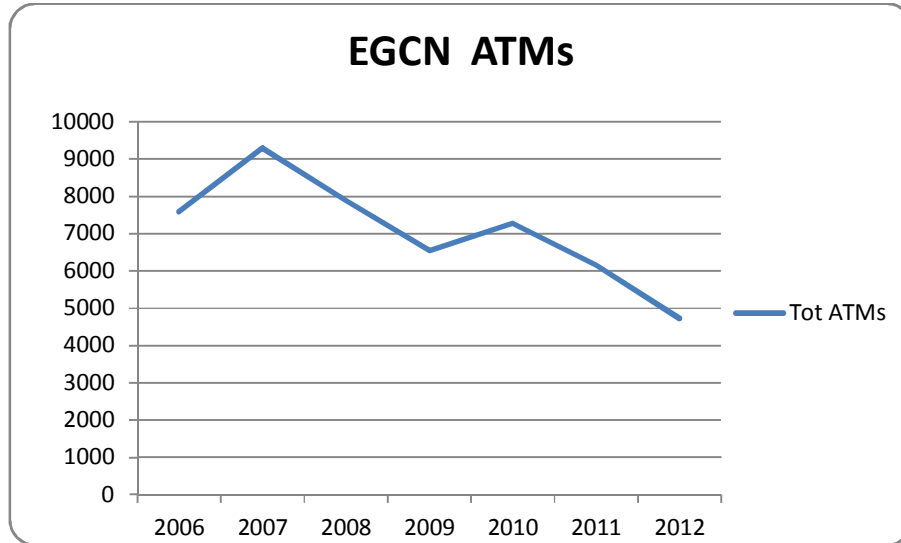


Figure 1: Doncaster Air Transport Movements 2006 to 2012 (source CAA statistics)

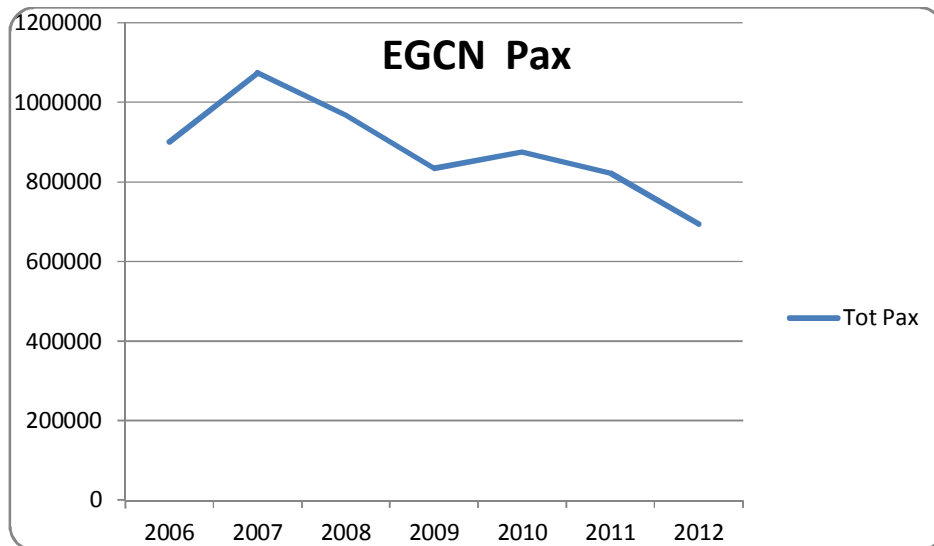


Figure 2: Doncaster terminal passengers 2006 to 2012 (source CAA statistics)

GENERAL AVIATION ALLIANCE

Partnership in Aviation

Annex B

To GAA Report

Dated 28 December 2013

BGA Cross-Country Glider Routings



Figure 3: BGA ladder record prior to Doncaster CAS establishment

(75779 data points from 752 flights between 1-Jan-2000 and 28-Aug-2008 inclusive)

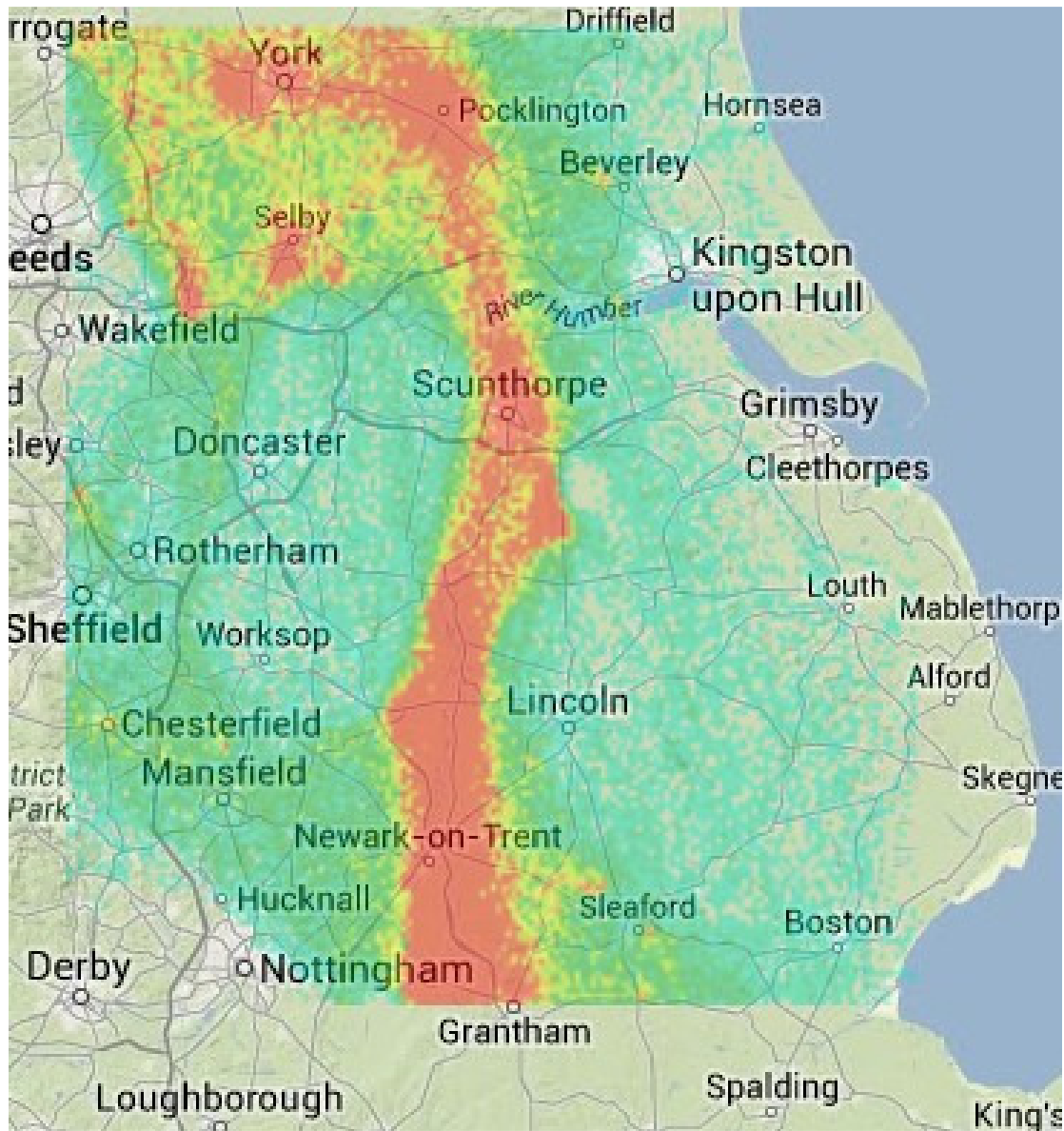


Figure 4: BGA ladder record after Doncaster CAS establishment

248352 data points from 2633 flights between 28-Aug-2008 and 24-Dec-2013 inclusive