

Manager, Air Traffic Services
Robin Hood Airport Doncaster Sheffield
Heyford House
First Avenue
Doncaster
DN9 3RH

24 March 2007

Dear Mr Massingham

ROBIN HOOD AIRPORT DONCASTER SHEFFIELD AIRSPACE CHANGE
PROPOSAL

Thank you for asking the PFA to comment on your proposal to establish controlled airspace at Robin Hood Airport Doncaster Sheffield. First let me say that it is a pleasure to receive such a well set out and clear document. It has taken us some time to respond as we have been overwhelmed by the volume of consultation from the CAA and the EC.

We always judge these matters on the safety case as it affects all airspace users and on the efficiency of airspace use. It is quite difficult to extract this information from your document but we have used what data there is to make an initial assessment on airspace efficiency. We could not assess overall safety and we think this is a significant omission. For each group of airspace users we would expect the safety and operational effect of the change to be considered. This should be based on data which will need to be collected. If you can achieve a good balance that produces no significant disadvantage to any group, we could support the ACP.

Your own case must be based on an operational need which must flow from the number of public transport movements. As this data is not presented, we have to use empirical figures. These are set out in our detailed comments which are in Annex A

Yours Sincerely,

John Brady

Vice-Chairman

Annex A to
PFA response to RHADS ACP informal consultation
Dated 24 March 2007

Pax numbers

First 12 months 840k
Forecast by end 2 mil and by 2010 4 mil

Only public transport flights are relevant in the ACP.

1.3.2

One of the key factors in deciding the need for controlled airspace is the number of public transport flights. Other types of flight are not relevant to the proposal and should not be put forward as justification.

Your figure of 840,000 passengers in the first year suggests an average of about 12 movements each day (based on a 200 seat aircraft) of which half can be expected at night or in the hours that VFR traffic does not trouble the airport. So the proposed airspace would protect 3 departures and 3 arrivals.

Turning to forecasts, DAP has said that taken together, the growth aspirations of the individual airports in the UK are not realistic and cannot be accommodated. Your forecast for the end of 2007 suggests the departure and arrival figures above might increase to 6 departures and 6 arrivals, increasing further to 12 and 12 by 2010. If we use DAP's view then we might consider these to be a maximum although we would want to see current data on public transport flights and supported forecasts.

We look at this traffic level in relation to the important matter of airspace efficiency later on.

1.4.1

Any ACP must be based on an operational requirement but we cannot agree that this has been determined. This must be set out and cannot be taken for granted. No operational requirement; no airspace change.

2.1.3

Agree that this is a very busy area with multiple users. RHADS is the newcomer here and now seeks to reserve airspace for commercial purposes to the detriment of existing users. In these circumstances an ACP must show absolutely clearly that the needs of the other users have not been adversely affected. This will require significant work but it will be necessary.

2.1.4

The application for Class D airspace marks a significant change point for RHADS and the constraints set at the PI which considered its original use should not be allowed to disadvantage other airspace users. The airspace design should be the most efficient

possible and if a further application is necessary to vary the findings of the PI then that must be done. Whilst RHADS might find it easier to go forward with the original PI outcome, it will be fundamental to other airspace users that the airspace design makes the best use of this busy common-user airspace. This might necessitate a further PI but that is a price RHADS may have to bear to achieve a safe and efficient airspace configuration.

2.3.1

Where you refer to safety data it will be important that reports and analysis are in the public domain and are verifiable by consultees.

2.3.2

You do not suggest that the aircraft you logged represented any safety hazard in relation to public transport operations. It might be best to be quite clear on this or you will be open to challenge.

2.3.3

The suggestion, that these airproxes relate to public transport safety, are not supported here. The incident at another regional airport should not be called up unless it is relevant. Similarly, are you suggesting that the CAA has failed to carry out some action following a report by the AAIB and this failure now requires an ACP?

3.1.2

It seems to us that a properly developed operational requirement would define the result that you want to achieve and go on to set out the characteristics of the environment that may be needed. This should be done before you can decide the options that will meet that operational requirement.

Now, Class D airspace may be the lowest class of airspace that encompasses all the characteristics you want but it will undoubtedly be more than you need in some areas. It may be that Class E airspace would partly meet your requirement and we would want to see this argued more fully than you have done here. It may be that TRA or special rules would also meet many of your requirements.

We believe that to satisfy the DAP's responsibility to share the airspace equitably between users, you will need to build up the options prior to detailed analysis.

3.3.1

We cannot agree that a LOE with the MOD would not work. If operational agreements cannot be made, and we believe they can, a Provost Marshal's prohibited area could be established to achieve the same effect as CAS.

3.3.2

We find the burdensome argument in relation to other airspace users to be unconvincing.

3.4.5

Having regard to the traffic volumes, it seems to us that Class E, perhaps with additional special rules, may be adequate for RHADS. For example, allowing VFR flight in a Class E CTR or TMA by aircraft with an altitude encoding transponder,

whilst requiring non-transponding civil aircraft and all military aircraft to obtain a clearance might achieve an appropriate level of safety. This would be along the lines of one of the key proposals flowing from the recent RIA on interoperability. We have proposed this informally to DAP and will now go forward with a formal proposal at the next NATMAC. We think you do need to look at a range of options.

3.4.6

The introduction of CDAs into the case for Class D airspace is not supported by any discussion.

4.1.3

The all-or-nothing approach to airspace design is not consistent with the emerging concepts of flexible use airspace and we will raise the matter with DAP. We think any reserved airspace should only be necessary and sufficient for the operational requirement.

Whilst you say you have designed the airspace to encompass routes and holding patterns but you will need to show that you have also designed these routes and holding patterns to minimise the impact of the CAS which will encompass them.