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### **TCSW Airspace Development Stakeholder Consultation Issue 1**

Thank you for sending the PFA a copy of the stakeholder consultation on the proposed TCSW Airspace Development. We have some objections in principle and some specific issues related to them.

#### **TC Airspace Policy**

The proposal affects a small slice of airspace on the west side of the main London CAS. It will always be easier to affect such a small change as it can be said (and indeed you do) that this is only a small adjustment to the CAS boundary. However, if this were to be one of a longer term series of boundary adjustments, “salami slicing” the airspace because it is easier to justify in that way, we would want to oppose it most strongly on a whole range of utilisation grounds that we will not rehearse now. We would like to see this proposal in the context of any longer term airspace capacity issues in the TC area and this would mean demonstrating that the capacity of the airspace after this change is implemented is adequate for the traffic demand anticipated by DAP out to his planning horizon. If that cannot be done, then it should be quite clear that this is only an interim position and you should anticipate the scale of change that will be needed in due course. We would wish to see this in the context of the long-term plan. Whilst this proposal may be a mechanism to improve operational efficiency, nonetheless it provides the basis for traffic growth so it has a place in the wider airspace plan. If that is the case, you should say so.

#### **The Operational Requirement for the Airspace Change**

The object is to reduce airspace complexity thus reducing delay and you quote a headline figure of 15,000 minutes of delay in a year. Impressive indeed, but this figure is attributed to the whole TCSW area and it does not appear to equate to the particular complexity problem you seek to address. You also say that because the demands of military and civil traffic do not coincide you have been forced to agree flexible use airspace which is not ideal. This suggests that the proposed change will not wholly solve the problem. Moreover, you do not say what TCSW delay figure you would expect were the airspace changed as proposed: you will certainly not remove it altogether. If, as you appear to suggest, the delay is the core issue, you must have modelled how this proposal would change it and you should say what it is and why that would be adequate. But you have not. Thus you have not made the operational requirement in this submission. This is particularly important as the

period of operation of the airspace seems to exclude some busy periods during the day. This issue must be the fundamental basis for the whole proposal.

#### Effect On Other Airspace Users

You say (para 3.7) that recreational flyers will be able to operate as they do today. This is not entirely true. An area that was available to class G users covered by R41 will no longer be available before 0930 nor after 1730 daily, the period 1730 to dusk being particularly relevant in summer which is our peak period, just as it is yours. Any operations that used the airspace (or used it as a buffer to the west of CAS) will now be moved west. We believe you should identify this operational change and the risk factors that will affect aircraft in Class G airspace.

Whilst it is the responsibility of stakeholders to tell you about the effect of the proposal on their operations, and we have attempted to do this, we are not able to quantify this aspect as we do not have the tools and the aircraft involved are from a range of stakeholder organisations making even estimates difficult. Nevertheless we are ready to engage with you to take this forward.

#### Flexible Use Airspace

Although we may be wrong, we think the R41 extension would be the first flexible use airspace that is likely to affect GA pilots. We think that most VFR pilots will avoid it anyway as once the boundary is shown on the chart, they will consider it safer to stay clear. Nevertheless we think there may be an increased risk of incursion here and perhaps you should identify it and say how it will be mitigated.

We are aware that you are introducing tools to mitigate CAS incursions in general but these rely on A/C or S transponders to be effective. We know that DAP's policy is not to mandate transponder carriage in Class G airspace except in incursion hotspots. This now needs to be considered as, if this change were to form an incursion hotspot, non-transponding aircraft could be excluded from the Class G airspace to the west. Thus this is an important issue for us and we would want to see it addressed. You will be aware of our view that where costs are incurred, the beneficiary should pay and it seems clear to us that the beneficiaries of this proposal are yourselves and your commercial customers. No doubt you will bear that in mind.

The availability of an effective radar service outside regulated airspace in this busy and complex area may be important to safety and you may want to link the introduction of such a service as one of the mitigating processes. It would obviously be most helpful if a radar service were in place before any change in the airspace. We are quite clear that the costs of such a service should fall on those who benefit from the airspace and we think that you as the sponsor should address this in your submission to DAP.

John Brady