

BRITISH GLIDING ASSOCIATION RESPONSE TO THE CONSULTATION TO ESTABLISH CONTROLLED AIRSPACE IN THE VICINITY OF NORWICH INTERNATIONAL AIRPORT

Dear Mr Burch,

This response is on behalf of the British Gliding Association. There are some 8530 members with 2514 aircraft in the 88 clubs around the UK. The UK has for some years been rated as the No1 nation at all major International Gliding Competitions held at venues around the world. This is in part due to the very varied weather conditions we experience in the UK and also the varied topography that can be encountered on the long cross-country flights, many over 500kms that are being achieved. This gives our pilots a great variety of conditions on a single flight. One of the best areas for cross-country flying is in East Anglia where cloud bases can be significantly higher than to the west. Thus very many long flights that may begin from clubs 100 miles distance from Norwich fly to the area and then continue towards the Wash and further afield.

Detrimental Effect on Gliding

This proposed large area of controlled airspace will have a highly detrimental effect on gliding in this area. Gliders will be funnelled into smaller corridors to pass by the airspace and, for example, avoid navigation hazards such as the parachuting club at Old Buckenham - a related BGA code of conduct states that in the event of receiving no response from the parachute site frequency the pilot should remain clear of the site. There are other airfields in the area that will add further to the congestion for all GA operations. This will inevitably lead to close encounters, or worse, for aircraft keeping clear of the proposed airspace.

The recent tragic collision between an RAF Grob trainer aircraft and a glider close to Abingdon has highlighted the fact that due to the limited areas of Class G airspace and significant areas of low level Class D airspace very many GA aircraft and gliders are funnelled into a small 'transit' corridors. There is a view that this accident was almost inevitable.

Therefore although you state in para 5.2.4 'there will be minimal disruption for general aviation activities in the area', the BGA believes that this large area of Class D airspace is totally disproportionate and will have a significant negative effect on gliding in particular.

Flawed Arguments

The consultation proposes that it enhances the safety of aircraft operating to and from the airport and appears to be based on two arguments.

Firstly, you state in para 3.1.3 that NIA traffic has continued to grow, which is patently not true. There has been a significant reduction in passenger numbers since 2006. The CAA figures show this together with a reduction in fixed wing ATM movements. The BGA is also aware that FlyBe has closed its base at Norwich. The future projection figures seem to be purely pie in the sky and in the current economic climate utterly

unrealistic. This is truly misleading and controlled airspace cannot be justified on these figures.

The justification for controlled airspace should be based on the requirements of fixed wing public transport aircraft. The BGA acknowledge that there are other operations at NIA, but these do not require controlled airspace.

The number of passenger fixed wing operations according to the NIA flight schedule shows that the 'controlled airspace' would be used on average day for just 10 CAT pax fixed wing movements each day. Due to the very low number of pax ATM's, there will be long periods in which GA may be restricted where no relevant movements are taking place.

Secondly, there appears to be a significant conflict with the military. This is confirmed by the number of 'occurrences' listed in Annex D some 53% of those listed. In para 4.4.1 you state that "there has been increased traffic density throughout the whole airspace and this means that risk has increased". This is once again not true as both the level of NIA traffic has decreased and the number of sorties and hours flown by the RAF has reduced. Again you are choosing not to give the correct facts to make your case.

It thus appears in para 4.3.1 that the closing of RAF Coltishall and Coltishall ATC, which has released more airspace for all users and particularly the military, is the driver for this proposal and as such it must be beholden on NIA to resolve this situation. You state that 'historically' most aircraft were being 'protected' when NIA and Coltishall ATC were functioning together, but now there is a significant increase in uncontrolled military activity at low and medium altitudes in close proximity to traffic flows of arriving and departing Norwich traffic. The BGA notes that there always were military aircraft operating autonomously, that military aircraft will continue to do so. It is not clear where the stated traffic flows will come from when the traffic data shows that there may be an hour or more without a CAT fixed wing arrival.

It is quite clear that General Aviation and in particularly gliding have minimal impact on the operation at NIA and there is nothing in the document suggests that problems are being caused by these operations.

Occurrences and other airspace events

This list clearly demonstrates the approach you have taken to try to justify your case. These occurrences and events are in reality very trivial and the BGA disputes that they constitute a robust safety case for granting controlled airspace.

Midair Collisions

In para 4.6.4 you refer to the four mid-air collisions that have occurred over a ten year period. You do not mention that these occurred throughout the whole of the UK. Without this clarification the perceived implication is that they occurred in the area of the consultation. It is mischievous and basically dishonest of you not to clarify that fact.

Airprox Reports.

You mention in para 4.5.1 that five Airprox reports have been filed since April 2006 and one was evaluated as Category B.

The BGA has reviewed all the airprox books and reports and concluded that there is only one that is relevant to this consultation - incident 39, Airprox 107/07.

- Incident 16 was not even reported as the conflicting aircraft was 1000ft below the CAT. This is 500ft lower than legally it needs to be even on a glide slope.
- Incident 23, Airprox 141/06 occurred at FL180, some 30 nm North of NIA and is thus totally irrelevant.
- Incident 29, Airprox 045/07. Both aircraft were in contact with NIA and both crews were aware of the presence of the other aircraft and could see each other (words from the report). Category C.
- Incident 39, Airprox 107/07 is relevant to the proposed area.
- Incident 48, Airprox 040/08. This occurred some 15 nm away from NIA at FI 100 and again is totally irrelevant.

Unless the consultees in receipt of your document are cognisant of the Airprox Board and its reports, they will accept your Airprox statement as a fact when once again you are being deliberately mischievous and misleading.

Proposed Airspace Design

The design of the proposed airspace is significantly out of proportion for the traffic at NIA. The proposed airspace to the west of NIA will virtually stop north bound glider flights. A base of 1500ft represents a height at which any sensible glider pilot will be looking for a field to land in and therefore transiting at that height in a glider is impossible. We also know from bitter experience that obtaining a clearance is becoming harder in Class D as the controller cannot 'control' the glider in height or heading.

Access to the 'Swanton Box' could be denied to gliders by RAF Marham. The BGA has experienced situations where if an RAF ATC unit has just one movement at roughly the time a glider pilot requests a clearance, the clearance is refused. If you unilaterally cede the Swanton box to RAF Marham, GA and airport airspace users will/may be excluded from that large area.

The proposed southern airspace boundary does not need to be placed further south than two miles from the centreline. This will ensure that CAT aircraft do not over-fly the city. There are good environmental reasons for not doing so.

Conclusion

The British Gliding Association strongly objects to the published proposal to establish Class D controlled airspace around Norwich International Airport. In summary, the reasons are;

- The proposals will have a significant adverse affect on gliding cross-country flights. This will result in significant negative social and economic impact on many clubs (small businesses) and their pilots and glider owners
- The proposed CAS is disproportionate for any need and there will be many hours each day where the airspace will be effectively unused
- The safety data provided in the document is to a greater or lesser extent inaccurate and mischievous. The Airprox statement is a case in point
- Statements about growth appear to be entirely speculative, and particularly given the economic climate
- The proposed airspace will have a significant negative safety impact on many GA operators as they are squeezed into a much smaller operating area and forced in many cases to transit the area to the west

Please acknowledge this submission and in due course I look forward to your detailed response to the points raised above. A hard copy will be submitted.

Yours sincerely

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