



8 Merus Court
Meridian Business Park
Leicester
LE19 1RJ

By email: airspaceconsultation@nats.co.uk

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T: 0116 289 2956
W: www.gliding.co.uk

BRITISH GLIDING ASSOCIATION RESPONSE TO THE PROPOSALS TO ESTABLISH TEMPORARY CONTROLLED AIRSPACE FOR THE LONDON 2012 OLYMPIC GAMES

The British Gliding Association (BGA) is the governing body of sport gliding in the UK and represents the local and national interests of 87 clubs and their 9000 or so regular participants flying some 2000 gliders. Gliding clubs are small businesses that operate as not-for-profit sporting facilities, many employ a small number of staff and all are entirely self-funded.

The BGA believes that the proposals for temporary controlled airspace as currently drafted have significant safety and financial implications for gliding operations in the South of England; in addition we are also greatly concerned by the general safety implications for all class G airspace users in the area.

We have a number of technical objections to the proposed areas of CAS(T). Before moving onto those objections we have a number of general observations about the way this process has been handled and the proposed dates;

- We would like to point out that although this project has apparently been underway for around two years, we have only been given eight weeks in which to deal with the complex issues involved. These proposals will impact the gliding movement far more than other airspace users - which NATS will have been well aware – and therefore an invitation to participate at a much earlier stage would have perhaps allowed that impact to be mitigated and discussed before the proposals were published.
- It should also be noted that since this consultation process was started, there have been significant proposals from other airfields, notably Oxford and Manston, that do not seem to have been considered during the initial design process. These new proposals have further complicated the situation and we believe that entire process should now be halted to allow these proposals to be properly coordinated with other developments. A fresh consultation period should then be established.
- The BGA had been led to believe that access via letters of agreement would be possible and our earlier planned response was developed on this basis. The consultation document appears to make reference to this opportunity on page 19. However, at a late stage it became obvious that there is no intention to allow LOAs and that any access would involve procedures that in reality mean no access will be possible for gliders. The basis of this decision appears to be the need to provide

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capacity for large numbers of aircraft at all times when the reality is that there will be large peaks and troughs in demand and numerous periods during which much of the extra airspace will not be required.

- The proposed activation date prior to games is twelve days before the opening ceremony takes place on the 27th July. This seems excessive. We believe that 3-4 days prior would be more appropriate.

Our concerns, objections and observations regarding the specific areas of proposed CAS(T) and routings are as follows:

Farnborough / Southampton. Areas 7 and 12:

The plan to bring Southampton inbounds straight in at 5000ft rather than the higher levels currently used seems to be the main driver behind area 12. This has led to the Farnborough “clutch” traffic being routed underneath at 4000ft necessitating a base of 3500ft for area 7 which will cause significant problems for operations at Lasham and other gliders transiting the area to and from the south.

We question the need to have the inbound traffic route almost straight in. Vectoring towards a longer base leg to the west would give track miles to lose height as required and should not cause a significant reduction in capacity. The BGA have spoken to Southampton and they have stated that they plan to “dog-leg” inbound traffic anyway and that having aircraft a 1000ft higher would not be a major problem.

Raising the level of Southampton inbounds is one of the measures that we feel could allow the base of areas 7 and 12 to be raised to a more acceptable level, say 4500ft, over at least part of its extent. It might also allow a simplification of area 12 which seems to be overly complex.

We would also like to see a raise in the base of the southerly part of area 8 to allow gliders returning to Parham to be higher at that point. If the area between Oakhanger and Midhurst which falls outside the restricted zone could be raised even on a temporary basis to 3500ft, then their problems would be significantly eased.

Oxford. Areas 6 and 7:

The detailed plans for Oxford control zone airspace had not been published when this consultation started so the flow airspace in area 6 and northerly part of area 7 was designed without knowledge of what Oxford were going to propose. It now transpires that is not what they want or need. Oxford would rather route traffic (either with their radar, Brize Norton or Benson) via KENET – BZ - OXF which would help de-conflict the very busy class G airspace in the Didcot/Benson area. A new ACP will be required to protect their traffic at 6000ft under L9 or perhaps just above the base of L9. This would free up much of the northerly part of area 7 or at least enable a higher base.

It would appear that NATS are not allowing this routing to be considered due to time constraints and reluctance to run the simulations again, despite it being an obviously safer route. As mentioned above, if NATS had consulted its general aviation partners at the design stage then perhaps this safer route could have been considered earlier.

We believe that re-routing the Oxford traffic in the above way would increase safety, reduce controller work load and increase the flow rate for the remaining Farnborough clutch airports. This would allow the base of area 7 to be raised significantly in a section starting around 2nm south of Lasham out to both the northern and western boundaries. As an LOA has not been offered we are requesting a permanent rise to 4500ft in that section. This would ease a large number of the operational and safety concerns at Lasham and the clubs further south.

Southend. Area 4:

This is another area where the situation has completely changed since this consultation was published. The moving, at the design stage, of the southerly boundary of area 4 to ease problems at Challock is much appreciated, however this area still seems overly large and we would like to see a raise in the base of the southerly side of this area. When combined with the restricted zone area 4 and the proposed Southend CTA will significantly restrict operations at Challock.

VFR Choke points:

The owners of many aircraft including helicopters, microlights and flying schools are currently planning to operate from bases outside the restricted zone for 9 weeks. There will be massively increased VFR activity in the airspace around and under the proposed flow airspace and the recently published proposals for Manston and Oxford add to the problem.

The BGA believes that the interaction of the proposed CAS(T) and the restricted zone will cause VFR choke points in 3 main areas where transits are available without entering controlled airspace;

Challock:

There is a very small gap 1 mile north of Challock gliding club in Kent where aircraft below 2500ft can route to avoid controlled airspace to go north/south east of Southend and the danger areas.

Manston did not consult the gliding or general aviation community when designing their ACP. Apart from the choke point over Challock this airspace will force most VFR aircraft that for whatever reason cannot get a clearance through Manston/Southend to route either east out to sea or go west into the Lasham corridor.

Lasham:

The various elements of airspace create a narrow corridor between Odiham and Southampton. The airspace over Odiham is 2500amsl which stops aircraft from flying over Odiham ATZ (2409ft). Any aircraft planning to fly north/south must do so west of Odiham not above 3400ft which brings it into conflict with Lasham, the world's busiest gliding club, which also has cable hazards. Several of the proposed helicopter routes also run through this area at 1100ft further limiting the vertical extent of available airspace. The alternative to this route is to fly out to sea west of Manston. We propose a raise of 500ft in the 2500ft airspace over Odiham and the airspace over Lasham to at least 4000ft to help mitigate what would still be a very busy traffic environment.

Didcot / Benson / Abingdon triangle:

Any aircraft that needs to fly east of Brize Norton from South East UK will be forced to avoid Benson ATZ (and ideally MATZ) which means staying west of Benson. Traffic would normally stay east of the Harwell zone and east of Abingdon and will obviously be below the flow airspace. This area is already exceptionally busy during good weather with large numbers of gliders and powered aircraft transiting in all directions. RAF Benson has confirmed they also intend to continue with flying operations.

We believe that additional restrictions in this area must be minimized. As such, Oxford traffic should be routed via KENET, and the base of areas 7 and 8 in that area should be raised to 4500ft and 3500ft respectively.

Conclusion:

This proposal does not offer a balanced and safe environment for all airspace users, it concentrates entirely on commercial air traffic flow and there appears to have been little consideration for safety within class G airspace. The proposals will cause significant operational restrictions and safety concerns for all gliding operations in the South of England as well as creating some severe choke points which will impact all class G airspace users.

This airspace consultation would seem to suggest that NATs have not undertaken any sort of risk assessment based on available data (primary radar traces and glider logger traces) for class G airspace. This would appear contrary to all current safety systems in place for airspace management. If such a risk assessment has been carried out we would be very interested to see the results.

The BGA believe that by incorporating the relatively few changes detailed above, this proposal can be made both safer and less disruptive for both the gliding movement and the wider general aviation community. We also believe that it will improve the flow traffic safety and capacity.

We urge NATS to give this response serious consideration.

Nick Hoare.

For the British Gliding Association.