

# AIRSPACE GRAB

The BGA's John Williams and Pete Stratten provide an update on TAG Farnborough's detrimental airspace change proposals

**T**AG Farnborough (TAG) has submitted its airspace change proposal (ACP) to the CAA. Having engaged with TAG on a number of occasions during the consultation phase of the process, the BGA believes that we have a very accurate understanding of the precise proposals that TAG will have made to the CAA. TAG's proposals would fundamentally change the airspace structure over a very large area of southern England – one of the busiest areas of GA activity anywhere in the country. The implications for gliding are highly significant and detrimental.

You might wonder how an ACP is dealt with, as well as the CAA's role in reaching a decision. Broadly speaking, the CAA must manage airspace taking into account efficiency, safety and the needs of all airspace users. They must also consider environmental objectives, joint provision of ATS, national security and international obligations. And like other UK regulators, the CAA is required to be targeted, proportionate, consistent, transparent and accountable.

## **Confidentiality clause**

The CAA has ownership of the ACP process. Its related policies are described in a couple of CAA publications, which identify how the airspace change proposer is encouraged to decide and submit their own justification for what airspace change they would like to put in place. The CAA then makes a decision based on the evidence submitted by the proposer. Of course, the proposer is required to consult, but not necessarily on all the detail; airspace proposers may apply a confidentiality clause to restrict access to specific detail within proposals submitted to the CAA.

There are a significant number of airspace changes approved each year by the CAA. Many changes are non-controversial for the simple reason that stakeholders recognise the need. The problems occur where, for example, a

proposer sees controlled airspace as a commercial asset rather than an agreed and proportionate solution to a properly explored problem. Without seeking input from the GA community it is impossible for either a sponsor or the CAA to assess the impact of changes on overall flight safety and efficiency for all airspace users. So, many proposals are inadequately thought through, or simply biased, and poor judgements are made. Many of us can list historic airspace change decisions that were surprising then and remain so. Doncaster comes to mind.

## **So what is it about the TAG proposals?**

TAG is primarily concerned with general and business aviation and is not associated with fare-paying passengers in a commercial air transport sense. Among the hundreds of pages of its consultation documents, TAG implies that its proposals will deliver direct and material benefits to the wider GA community by addressing safety and efficiency issues, and better enabling normal GA operations in the area around Farnborough. However, the clear reality is that TAG's proposals are entirely self-serving; will impact, distort and limit the activities of a great many GA pilots; and increase risk for those operating outside of the boundaries of the airspace being requested.

TAG has repeatedly stated that there are no specific or systematic, demonstrable safety-related issues that require direct action. Our own analysis of airprox and other data concludes the same. There is no safety case for the proposed airspace. It is a matter of principle that airspace changes should not result in a less safe situation. Independent analyses have shown that the majority of GA operators avoid CAS. Similarly independent analyses also show that in the region of 70 per cent of GA traffic will route around new controlled airspace.

The area of open FIR to the west of Farnborough, roughly up to the Solent CTA, is among the busiest area for GA

traffic in the country. There is an already recognised and well-studied GA 'choke point' in the area. If proposed changes are implemented by the CAA, risk levels for GA in those remaining areas of class G west of Farnborough will increase materially as both local GA activity and transit traffic would be consigned to a smaller area outside of CAS. There is a clear safety case for not imposing controlled airspace.

So what comes next? The ACP process requires the CAA to consider the detail submitted by TAG and then make a decision. A detailed assessment of the proportionality and safety issues has been recently submitted to CAA by the BGA and its GA Alliance partners within a wider, robust critique of TAG's proposals. We have advised the CAA that we are more than happy to share details of our assessment of the TAG proposals at any point, just as we will be with any other party should we decide to take our case through any other channel. In the meantime the CAA has begun a review of the existing, flawed ACP process.

## **Unprecedented response**

We hope that update is helpful. Last year there was an unprecedented response (both in quantity and quality) from thousands of pilots, and outstanding inputs from Latham and Southdown clubs in particular. We do not know how TAG have chosen to present these in their current submission to the CAA.

It is hard to imagine any grounds on which a responsible regulator could approve the proposals, but we have been surprised more than once in the past. If the worst were to happen, we will have no option but to pursue the matter in every way possible. That may mean that we come to members looking for further support, including financial support. We believe that it is vital to do whatever it takes to protect your continued and future access to vital tranches of uncontrolled airspace.