

BGA RESPONSE TO CAA CONSULTATION ON VMC MINIMA IN CLASS D AIRSPACE

Submitted on 2019-05-28 12:01:43

Organisation:

British Gliding Association

Questions

4 Do you agree with the CAA's assessment of typical weather conditions in the UK?

No

Comments:

The BGA is not in a position to specifically agree or disagree with CAA's data on typical weather conditions in UK Class D airspace. However, it should be born in mind that there is a much greater quantity of GA traffic, especially gliders, in the summer months. Over the winter quarter there will be virtually no cross-country glider flights that might wish to enter Class D except for areas known to benefit from Mountain Wave (mostly Scotland, Wales and N Yorkshire). It might have been more useful to take into account seasonal variations in weather, weighting it in correlation with seasonal variations in GA activity in order to work out the "peak" rather than the annual average.

5 Do you support the CAA's preferred option and the associated assumptions?

No

Comments:

The BGA does not support the CAA's preferred option. Option 1 is the BGA's preferred option. The CAA has not made a practical or safety related case for aligning itself with EASA on this point. The motivation appears to be purely a bureaucratic tidying exercise, that negatively impacts GA.

The UK has a number of longstanding differences from both EASA and ICAO requirements. It has not been explained why DfT and CAA believe that this particular difference cannot continue. The consultation document states in para 1.1 "This latter outcome additionally satisfies industry expectations regarding reduction in UK Differences from ICAO requirements" but the effect of this change will fall mainly on GA. Industry expectations on this matter are of secondary importance to preservation of access to GA.

It seems unlikely that the airline industry is at all interested in VMC minima in Class D. Nor ATC since they do not like change for the sake of it and they will likely be concerned by increased controller workload (actual or perceived). And definitely not GA, since it serves only to disadvantage them. It is not even clear whether the change to ATC SVFR separation rules would not in itself be another "Difference" to be filed with ICAO and EASA. The reasons for CAA rejecting option 1 seem very weak.

We note in para 3.1 that the CAA has chosen to use Class D VFR transit data from the depths of winter (November to January), with concomitant short days, poor weather and GA traffic at a minimum. Whilst the CAA mentions seasonal variations in para 3.7, it is not clear to the BGA whether this quarter was chosen simply because it was readily available and seasonal variation had not at that point been considered, or for some other reason (not explained). In any event, the figures presented are very much lower than could be expected on a peak day such as a holiday or weekend in summer. When proposing to change a system it must be shown that it is fit to cope with the peak in activity, not just the average.

The BGA also does not consider that using the aerodrome-reported meteorological conditions to determine rules anywhere within what may be a large CTR is very satisfactory. Some UK airports with CTRs may be in locations where meteorology conditions vary dramatically within the CTR. Any airport near the coast is an obvious example – there could for example be advection fog giving near zero visibility in one part of the CTR, with CAVOK conditions in another.

6 Do you agree with the CAA analysis of the projected workload change for ATC units and the effectiveness of the proposed mitigation?

No

Comments:

The CAA has not made any ATC workload change projection analysis available for us to comment on. However, we make an observation relating to human factors, namely the reluctance of ATCOs to reduce the level of service they are accustomed to providing and think it is their common-sense duty to provide. BGA members have observed routine overcontrolling of VFR traffic in Class E airspace by controllers who are accustomed to controlling in Class D and higher, still ongoing some 6 years after the introduction of Class E airways in Scotland. Comments from ATCOs are that they simply don't want to reduce the level of service they are used to providing to IFR traffic in Class E compared to D, by following the "Traffic information, vectors if requested and don't let the blips merge" protocol. Instead they continue to engineer standard separations for IFR traffic from VFR traffic as the first resort.

It seems highly likely that ATCOs will continue to want to separate SVFR from SVFR regardless of rule changes, and thus the answer to question 3 is "No".

7 Do you agree with the CAA analysis of the potential impact on the provision of non-IFR flight? Are there any additional factors you feel should be considered?

No

Comments:

Following on from Question 3, the BGA considers it highly likely that there will be an increase in controller workload which and that as a consequence there will be a reduction in accepted entries of SVFR (formerly VFR) traffic into Class D.

The BGA also notes that the adoption of SVFR as an attempt to mitigate the removal of long standing VMC criteria in UK Class D, only applies to Class D CTRs. It does not apply to Class D CTAs, in which SVFR is not available. There are numerous airports in the UK that have a Class D CTR at their core, with areas of Class D CTA out along the extended instrument runway centrelines. Bases of these Class D CTAs can be 1500' to 2500', ie typically below 3000'. An aircraft wishing to transit Class D with a limiting cloud base would have one set of VMC minima to apply when in the CTR, perhaps requiring a SVFR clearance, and when wishing to continue to a seemingly same class of airspace, would find it unable to proceed due to being unable to obtain an SVFR clearance for the portion that was a CTA. This would disadvantage gliders more than powered aircraft since the latter could descend below the CTA whereas a glider would likely be unable to do so without serious risk of having to make a field landing. The outcome will be that the glider pilot will be even less likely to contemplate flight in Class D than at the moment.

8 Do you agree with the CAA's assessment of safety impact?

No

Comments:

The BGA does not agree with CAA's assessment of safety impact.

Any suggestion by the CAA that their proposed change "simplifies the regulatory framework" is more than offset by new complication of different rules for SVFR and hence ability to fly in Class D CTR vs Class D CTA.

Para 5.6 is confusing because CAA is citing the increased vertical distance from cloud as a "see and avoid" benefit whilst at the same time promoting flight under SVFR to resume the current vertical proximity to cloud. This point is therefore not logical.

Following on from Question 4 the BGA believes that the practical result of the proposed changes will be a reduction in VFR transits through Class D and thus an increase in traffic flying around the Class D and potentially into choke points between areas of controlled airspace, increasing the risk of collision.

The BGA also believes that for aircraft transiting Class D under SVFR, there will be increased pilot workload due to increased RT exchanges and tighter control from ATC. Increasing pilot workload reduces safety.

The issue further underlines the difficulties associated with excessively large volumes of class D airspace that are an increasing feature of the UK's lower airspace. Minimising the size and volume of controlled airspace to that actually required is an increasingly pressing need that is not being addressed.