

Thursday, May 8, 2014

Roger Walker
Director of Airport Operations
Farnborough Airport
Hampshire
GU14 6XA
United Kingdom

Reference: 20140423 LAA Farnborough ACP response

Dear Mr Walker,

TAG Farnborough Airport Airspace Change Consultation Response from the Light Aircraft Association

Your Reference: NATMAC 20 dated 31 January 2014

1.0 Thank you for consulting the Light Aircraft Association (LAA) on proposals to change the classification of airspace around Farnborough Airport.

About Us

2.1 The LAA has some 8000 members and regulates over 4000 recreational and amateur-built aircraft on behalf of the CAA. Our aircraft fleet ranges from historic examples to modern high performance aircraft with sophisticated navigation systems. Our members' experience and qualification covers the full spectrum of professional to amateur but they fly mainly in day VFR conditions. Because of the structure of controlled airspace in the South East of England, access to and through the area around Farnborough is very important to our sector. The LAA has a high regard for air safety matters generally and supports the establishment of controlled airspace where circumstances require it. However, we expect the extent of controlled airspace to be limited to that necessary for public transport flights and we expect to see the impact on other airspace users recognised and mitigated effectively.

About Our Response

3.1 As this is a corporate response from a NATMAC member, the specific questions you pose in your consultation are not appropriate for us to answer. We set out our position in the sections that follow and where we support or object to a particular proposition we have emphasised this in an indented statement in bold. Where we object we expect you to take account of that and to indicate how you will do that in your Consultation Feedback.

3.2 Where we disagree with a statement or proposal that you subsequently use in your Formal Proposal Submission we would be grateful if you would draw our position to the attention of the CAA. Where we set out the operational, economic or safety impact of the proposal on our sector we expect this to be reflected in the Operational Report (CAP 725 Appendix A refers). If you disagree with any of our impact

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statements we would be grateful if you would tell us prior to the submission of the Operational Report.

About the Consultation Format

4.1 The consultation appears to require respondents to complete the questionnaire but many questions are couched in terms which could be interpreted as support for the proposal whichever option is chosen. Moreover the option to upload a response document is included in a place that is very difficult to find. Many of our members have contacted us to say they cannot respond in a proper way and we have had to provide detailed instructions on how to proceed. Many will have given up. The arrangement of your consultation does not help people to participate as required by CAP 725 Stage 3 para20f.

4.2 We are very dissatisfied with the response arrangement in your consultation and wish you to convey to the CAA our request that this is never allowed to happen again in an airspace consultation.

We oppose the proposal because the consultation does not help people to participate contrary to CAP 725 Stage 3 para20f.

We invite the CAA to ensure the arrangement used in this consultation is not used again by other sponsors.

The LAA Interest in the Proposal

5.1 Your website describes Farnborough as a private airport and we understand that you deal with private and corporate flights only. You do not offer scheduled or charter flights to fare-paying members of the public as is the case at other public airports in the south-east. The surrounding airspace is already used by a great diversity of private, commercial and state aircraft and you rightly note that changes anywhere change the interaction between these operations.

5.2 It is clear from your proposal that the impact on other airspace users would be significant. Whilst you allude to this in the design options in Part E you have not quantified or addressed the operational, economic and safety impacts on other users. Although CAP 725 does not require you to consult on these impacts you are required to deliver an analysis of them in the Operational Report to the CAA as part of your submission as set out in CAP 725 Appendix A paragraph 7. What goes into that is fundamental to the outcome of the decision process so we focus on these aspects of the proposal. We consider the reasons for your proposal, particularly the business case for CAS and the impact on Farnborough of not proceeding with the change, and we set out the impact on the Sports and Recreational Aviation (S&RA) segment were the proposal to be implemented.

Airspace Options

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6.1 The airspace covered by this proposal is perhaps the busiest area for GA in the country. The S&RA segment has been using the area for many years and because of the position of Heathrow, Gatwick and Southampton it is the only airspace available for local operations and transit from adjacent areas. It is a matter of principle that airspace and policy changes should result in an increase in safety and certainly not result in a less safe situation. Prior to the establishment of your present operation the other airspace users co-existed for many years and achieved an appropriate level of air safety that was acceptable to all of them. Your introduction of large, fast private aircraft into this airspace has already increased risk to other airspace users and you now propose to exclude them from a substantial part of the airspace which will increase their risk further. To facilitate movement for your own private flights you would largely remove all S&RA flights from the area and block access to and from the South-East and Europe. You may consider that this is overstated but it is not, as we shall show later.

6.2 In part E you consider various "concepts" for the airspace but none would mitigate the significant operational, economic and safety impact on S&RA. The "Do Nothing" statement at 2.4 offers a concise description of why you seek change; you state that it is needed to prevent delay and disruption to your own traffic but you would achieve that by effectively removing S&RA operations from the area and increasing risk to them; something we expand on later. You seek to remove the public good provided by this airspace and replace it by your own private good and you will therefore recognise that we do not support your objective.

We oppose the proposal because it would remove and block airspace which constitutes a public good and reserve it to a private good for your private commercial purposes.

We oppose the proposal because it would substantially increase risk exposure to other airspace users and the users of adjacent areas of controlled airspace.

We oppose the proposal because its operational and economic impact on other airspace users would be significant.

6.3 You state that "do nothing" is not sustainable because the existing airspace infrastructure is not robust enough to operate at the predicted 2019 number of TAG Farnborough movements which would see a doubling of your private traffic. Clearly then, the entire basis on which this proposal is constructed depends on the veracity of your prediction; if it is invalid, the airspace change is not required and the proposition collapses. We therefore examine this in some detail below.

The Business Case For The Proposal

7.1 Over the last 10 years our experience of the growth predictions of airports has been that they are invariably grossly overstated to support a case for airspace change. Typically an airport master plan is produced stating that traffic levels will double over a relatively short period but that is always written by the same organisation that uses the statement as the basis for its airspace change. Commonly,

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traffic levels have reduced after an airspace change and we see nothing in your proposal that might make this case different.

7.3 Whilst we do not have access to your business model, the growth prediction does not appear to represent a normal and realistic business activity and you offer no evidence to support the bald statements. Whilst TAG Farnborough presents an attractive image, the airfield is not H24 or CAT III and these operational deficiencies mean that many business aviation operators will only use it because there is no capacity at airfields which can offer these facilities, particularly Heathrow. Moreover the doubling of capacity on which your proposal is based probably rests on an assumption that you can attract traffic from other airports in the South East rather than through net organic growth. This leads to interesting considerations of airports policy.

7.4 In 2010, the incoming government announced the setting up of a South East Airports Taskforce (SEAT) charged with making the airports better but not bigger. The ash cloud event influenced this as the reduced annualised volume of flights at Heathrow was seen to be handled comfortably ignoring that other traffic volumes in the London TMA had been reduced by the recession as well. As traffic levels have returned, Heathrow traffic is once again hitting the cap of 480,000 ATMs and the question of additional runway capacity is in the forefront, this time being tackled by the Airports Commission, chaired by Sir Howard Davies.

7.5 As you note in Part A paragraph 3.9, The Airports Commission announced in December 2013 a range of measures to realise the original objectives of the SEAT and will go on to announce in 2015 how the UK's runway capacity needs should be met; after a new government has been elected. Of course any incoming administration is not bound by the Airports Commission findings unless and until all of the political parties sign up to a 'hybrid' bill committing them all to a project that they agree is in the country's interest. Recent examples are the Channel Tunnel and HS1 but there is no movement on one for airports at the current time. This indecision leads to the following national scenarios:-

1. No decision made: whilst a decision is pending it would be short-sighted and quite inappropriate to take this ACP forward as subsequent developments could well render the new airspace completely unfit for purpose and require it to be removed. You state that your airspace requirement relates to projected 2019 traffic levels which may or may not be achieved so you do not need the airspace today. We would therefore expect the CAA to delay any further CAP725 process until a decision is made and your traffic forecast is proved correct in practise.
2. A decision that there will be no new runway(s): operators are expected to use unwanted capacity at Gatwick, Stansted and other regional airports – you could then legitimately claim that Farnborough could be the 'home' of private business aviation and offer to bring business and private traffic in to free up capacity at the other airports. In that event and if traffic figures are proven correct it would be reasonable to revisit the proposal on its merits and deal with

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airspace requirements as and when the growth materialises. There is no imperative to take action on airspace in advance of that.

3. A decision to allow Heathrow to develop a new runway: once completed and upon opening, a third runway will increase capacity by approximately 240,000 ATMs. It is highly unlikely that the airlines will either have the demand or budget to increase aircraft numbers in their fleets to absorb all of the newly available capacity even in the medium term. Any spare capacity would be made available to ad hoc operators, including business and private aviation, according to UK and European slot legislation. It is not difficult to see a substantial movement of GA flights from Farnborough to Heathrow under these circumstances.
4. A decision to allow Gatwick to develop a new runway: the outcome of this would be broadly the same although it is likely that the Government might seed the newly developed runway capacity at Gatwick by persuading current Heathrow based carriers to move leading to spare capacity at Heathrow and more ad hoc availability. The outcome would be the same as that at Para 3.
5. A decision to build a new airport: this would be identical to Para 3 and 4.

7.6 In each of these cases bar Scenario 2 the prospects for the increase in traffic at Farnborough are ill founded. If the demand for Farnborough was strong, then it would have already reached its earlier planning limit in ATMs but it has not. Indeed traffic levels are broadly flat and no evidence is adduced in the consultation to support the stated growth figures which appear to be chosen solely to suit the argument. If business aviation operators preferred Farnborough they would already be using it but they are not. In fact, business aviation operators tend to use Farnborough only when the slot availability at Heathrow is either insufficient or unusable for the required aircraft schedule.

We oppose the proposal because the growth figures on which it relies on are unrealistic and have no evidential basis; they are chosen solely to support the proposed outcome.

7.7 The business case for controlled airspace to support Farnborough development is critically dependent on the outcome of the Airports Commission and on the decision by the next government. Although you state in paragraph 3.9 of the consultation that any action resulting from the Commission "would be separate and follow at a later date" that would be quite the wrong way to proceed. CAP 726 sets out the responsibilities of the CAA on airspace and the first of those is the preparation of a co-ordinated strategy for the use of UK airspace so it has a duty to take account of the conclusions of the Airports Commission and cannot deal with this application in isolation. Moreover the present lack of growth at Farnborough contradicts the ACP forecasts and removes any need for further action ahead of the Government decision following the Airports Commission report.

We oppose the proposal because, even using the unrealistic growth figures presented, the decision to establish CAS for TAG Farnborough

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does not need to be made until after the outcome of the Airports Commission is known.

7.8 Because of the dramatic impact of a proposal such as you present, any airspace changes resulting from airports policy need to be taken on a national and public interest basis rather than the private commercial interest basis you are pursuing.

We oppose the proposal because decisions on the future use of the airspace can only follow from the outcome of the Airports Commission.

The Impact of the Proposal on Other Airspace Users

8.1 The CAS design you propose is large and although you state that it "takes account of the needs of as many airspace users as possible" in fact it does not offer them any substantial solution so other air traffic would be largely excluded. The specific statement at Part E 2.11 that "We believe that, on balance, the majority of stakeholders have had their requirements met by the proposed designs" is just nonsense. It is a false statement. You have designed it to meet your own "requirements" and expect other stakeholders to be moved aside.

We oppose the proposal because the consultation and the proposal itself are based on the false premise that the majority of stakeholders have had their requirements met. They have not.

8.2 In Part E of the consultation you refer to the access that other stakeholders should expect following establishment of the CAS. The CTR and CTAs effectively block the area from the gap between Heathrow and Gatwick out as far as Lasham. Whilst the consultation sets out various methods for access, routine VFR or SVFR clearance to transit through the main body of the CTR and CTA is unlikely and there is no route to the east. The route to the west passes through the gap north of the Southampton CTR/CTA and close to Lasham which has what we think is the busiest airspace in the UK. Moreover the route from the south through the Heathrow/Gatwick gap is so marginal that we judge it to be unsafe for the majority of S&RA pilots and it would anyway be prohibited to non-radio traffic.

8.4 We have considerable experience of the issues of VFR and SVFR access to CAS; typically during the consultation phase we are assured that access will be easily available and all the requirements of other airspace users will be met. But once CAS is in place it becomes difficult to cross a CTR when an IFR movement is expected and generally impossible once an IFR movement is in the zone. So if the present numbers of S&RA aircraft using the area attempted to enter the airspace once CAS was in place, we would expect the majority to be refused entry.

8.5 The introduction of SERA with its change to the VFR rules below 3000ft in the CTR will exacerbate this issue making VFR crossing clearances even less likely.

8.6 Even an attempt to access the proposed airspace would be dangerous because a refusal would force the pilot either to hold in the complex and heavily used corridor

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which would surround the CTR/CTA or take an alternative route to the west. In remaining clear of the Farnborough CAS aircraft are much more likely to infringe Heathrow, Gatwick and Southampton CAS as well as the ATZ of adjacent aerodromes and that, together with the increased risk of collision, particularly in the Lasham area, is unacceptable. If this CAS were established we would not be able to recommend that pilots attempt to access it because of the risk.

We oppose the proposal because the proposed mechanisms for transiting through and around the body of the CTR/CTA are so complex that the risk of infringement of other airspace is likely to be very high.

We oppose the proposal because access to CAS will not be available except to a very small proportion of users and it will be unpredictable.

8.7 Transiting the area by avoiding the CAS to the West would bring aircraft through the Lasham local flying area which is the busiest gliding area in the UK. Data collected and published as part of the CAA's Class G for the 21st Century study showed that this is the area with the highest concentration of collision risk in the UK FIR. We note that as a Significant Area for Sport recognised by Sport England, Lasham is likely to continue to provide training and to mount major regional and national gliding competitions making the airspace an area for other airspace users to avoid. Powered aircraft pilots generally do avoid this area because of the traffic density but were the proposed CAS established this would appear to be the only route to and from the South-East of England. Inevitably, pilots flying VFR would use this airspace and the risk for all airspace users and for sports participants would increase.

We oppose the proposal because it would force transit aircraft through the Lasham area to the west creating an area of unacceptable risk.

8.8 In Section E paragraph 10.1 you state that "It is important to note that attempting to improve the efficiency of the airspace, and enhance safety for all, will inevitably result in changes". It is absolutely clear that the efficiency of the airspace and safety of flight for airspace users other than TAG Farnborough movements would reduce significantly as result of the proposal so this statement is false. Moreover, the removal of delay for TAG Farnborough traffic which is cited in the consultation as a major element of efficiency is already much less than is experienced by members of the public at the main London airports where delays of up to 30 minutes at the gate or holding point are common during busy periods.

We oppose the proposal because it would exclude the majority of other airspace users and reduce their safety in order that TAG Farnborough traffic can be expedited; an unreasonable exchange.

We oppose the proposal because the statements presented about improving safety and efficiency for all airspace users are false.

Conclusion

9.0 Traffic Levels and National Policy

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9.1 You have stated that you require the proposed airspace to satisfy operational efficiency when your traffic levels have increased from 23,000 now to between 32,000 and 50,000 by 2019. We note that there has been no growth in traffic since 2006 and you have produced no evidence that traffic will grow at all. There is clearly no unsatisfied demand.

9.2 You have not adduced any reason why any change is needed until after the Airports Commission has reported and Government has made a decision about runways in the south-east.

9.3 Of the potential recommendations available to the Airports Commission, 3 out of 4 are likely to result in significant reduction in TAG Farnborough traffic.

9.4 If controlled airspace is established before Government has made a decision on airports in the south-east, it is likely to have to be changed or removed altogether therefore this proposal should be deferred until after the decision is made.

10.0 Impact on Other Airspace Users

10.1 The safety and economic and operational efficiency of other airspace users would be substantially reduced by the proposal and the consultation statement that "on balance, the majority of stakeholders have had their requirements met by the proposed designs" is false.

10.2 Access through the airspace for VFR and SVFR flights would be very limited and the majority of flights would be excluded. SERA would exacerbate this. This would effectively block access to and from the south-east. Aircraft which were refused entry would have to turn back or detour around the CAS increasing the risk of collision and infringement which in turn would increase the risk to traffic at the main London airports.

10.3 The risk to and from Lasham traffic would increase significantly.

10.4 The consultation proposes to remove the present users of the airspace so it can be used primarily for the private purposes of TAG Farnborough.

11.0 LAA Position

11.1 The LAA opposes the establishment of the CAS set out in the TAG Farnborough consultation because there is no operational requirement for it today and none is likely to develop until after the outcome of the airports commission is decided. A decision should be deferred until that time and then the balance of airspace requirements of all airspace users should be considered further.

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John Brady
Vice-Chairman

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