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GLASGOW AIRSPACE Proposal for Reclassification of the Glasgow CTA from Class E to Class D

CONSULTATION ADDENDUM FEEDBACK

Executive Summary

This document provides feedback to all stakeholders who participated in the second consultation exercise undertaken by NATS for the proposal for reclassification of the Glasgow Control Area from Class E to Class D.

The initial Glasgow CTA stakeholder consultation was of 14 weeks duration from 16th December 2008 to 24th March 2009. The second consultation (referred to as the addendum consultation) requested feedback on a modified proposal with raised base levels. This was of 4 weeks duration, from 28th March 2011 to 26th April 2011. The changes to this airspace have been consulted upon for a total of 18 weeks, with feedback having influenced the final design. For both phases of consultation (initial and addendum) the stakeholder consultation document was distributed and/or made available to a total of 96 representative organisations. These are listed in Appendix A of both the original Consultation document and the Consultation Addendum.

The statistics in this report were compiled after the close of the addendum consultation period on 26th April 2011. This feedback report will be made available on the following website:

<http://www.nats.co.uk/env/airspace-developments/>

Figure 1 below shows the proportions of responses to the addendum consultation from stakeholders.

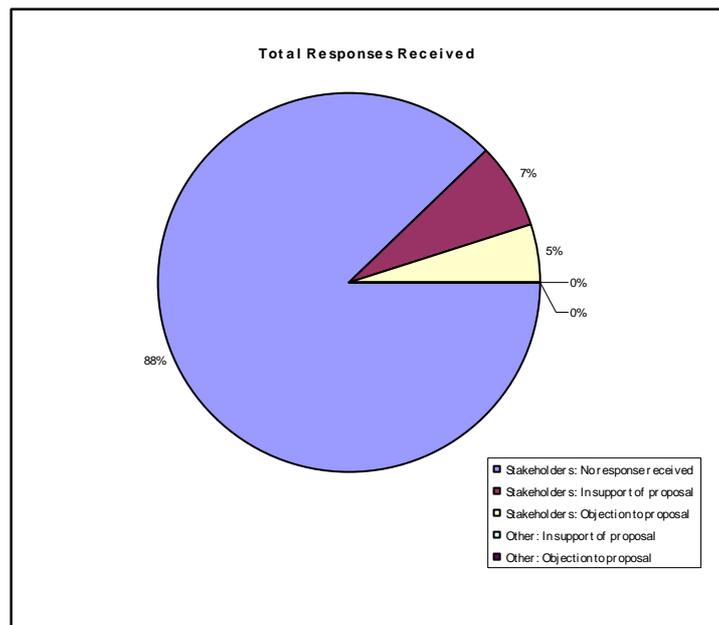


Figure 1. All responses pie chart

In the event that a representative organisation wishes to present **new** evidence or data to the Director of Airspace Policy, for consideration prior to making his regulatory decision regarding this proposal, the representative organisation must submit, in writing, the information to the following address:

The Director (Glasgow CTA ACP)
 Directorate of Airspace Policy
 CAA House
 45-59 Kingsway
 London
 WC2B 6TE

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1. Introduction

This document provides feedback to representative organisations who participated in this consultation exercise. This document has been sent to all stakeholder organisations which participated in the consultation, and is posted on the <http://www.nats.co.uk/env/airspace-developments/> website.

This document should be read in conjunction with the initial consultation document (2008) and the consultation addendum document (2011). All acronyms and technical terms are explained in full in the stakeholder consultation document.

2. Suggestions for design modifications & next steps

NATS has listened to the feedback received from all of the stakeholders and other respondents during the course of the consultation exercises. There was evident support to the proposal to change the Glasgow CTA to Class D airspace as proposed, however, there were also notable concerns over the loss of Class E and the freedom/flexibility this offered to other aviation stakeholders.

NATS has listened to these concerns, and the design has evolved significantly as a result of stakeholder feedback. This has resulted in a design which seeks to strike a balance between the requirements of all interested parties. The consultation addendum presented the evolution of the proposal through three distinct phases. Consultation feedback has been directly responsible for changes to the design resulting in higher airspace bases.

NATS will now deliver an Airspace Change Proposal to the Directorate of Airspace Policy, CAA. The proposed design will be as presented in the consultation addendum (see figure 2 below).



Figure 2 Proposed airspace design

3. Key issues and themes identified

Agreement from the majority of stakeholder responders supporting the change from Class E to Class D.

Concern from General Aviation stakeholders (including individual responders) of a loss of Class E flexibility to radio and non-radio flights.

4. Comments on key issues

Although NATS is proposing Class D airspace (which permits VFR access under an ATC clearance) in the Glasgow CTA, there remains a perception that access will not necessarily be granted to radio equipped flights.

NATS Glasgow have undertaken an internal review of their operations to ensure that the best possible access arrangements for VFR transit flights are in place for any pilot wishing to access the region. Glasgow ATC will record all instances where access has been denied together with the reason for the refusal.

NATS Glasgow are open to facilitating non radio access to the airspace for competitions, rallies or record breaking attempts on an individual case basis with appropriate notice, procedures and notifications put in place to ensure the safety of all airspace users in the region.

Comments relating to the noise impact of transiting GA flights (taking a different route). The noise impact of transiting light aircraft flying at 2500-3000ft amsl is not considered significant. Cumbernauld airfield (elev 305ft) has traffic in the pattern routinely at 1000ft agl.

Some stakeholders commented on the volume of airspace required for operations at Glasgow making comparison to Gatwick & Stansted CTAs. The CTAs at Gatwick & Stansted are smaller than Glasgow, however they are embedded within Class A airspace to a base level of 2500ft amsl, which means that the volume of controlled airspace available to ATC is far larger.

Some responses referred to the passenger numbers and flight number which have shown a decline. While overall the traffic numbers have shown a reduction, the peak busy periods are still as busy, and the need for a known traffic environment remains.

Two responses mentioned that "Computer generated flight plan are now required by Glasgow". This is not true. AFPEX, a new computer-based method of flight plan submission has been made available. However this is simply another way that pilots can submit a flight plan. This is provided in addition to the established methods of flight plan submission. Filing by telephone or air-filing by radio are still permissible. However, pilots are encouraged to use AFPEX which means that the flight plan info is automatically made available to ATC, thus aiding planning and controller workload.

Some responses stated that Class D airspace will "force aircraft to fly dangerously close to the terrain". Where & how low an aircraft is flown is the responsibility of, and at the discretion of the pilot in command. Any aircraft which is radio equipped is able to request a VFR clearance and can fly at altitudes above 3000ft amsl within the CTA. Aircraft which are not suitably equipped can choose to fly below the controlled airspace if weather conditions allow. If the ground feature of the M9-M80-M73-M74 motorway is followed (as is common practice by GA pilots) the maximum elevation of terrain is ~500ft amsl which if flying at 2500ft would give a terrain clearance of 2000ft. The highest terrain under the existing Glasgow Class E airspace is Earl's Seat (1678ft) in the Campsie Fells in the northwest corner of the airspace. This peak is not in the line of the usual north-south route taken by GA pilots. In the event of inadvertent flight into cloud or low visibility, a flight at 2500ft would have 822ft clearance above the peak.

Some responses expressed concern that the change would "compromise safety of aircraft to/from Cumbernauld & Strathaven". Aircraft approaching Cumbernauld & Strathaven would have to be below 3000ft. Good airmanship and sensible flying dictate that over-flying GA aircraft transiting (e.g. at 2500ft) should monitor Cumbernauld / Strathaven frequency as they fly over and make a call on the AFIS/Safetycom frequencies. Over-flights should pass at least 1000ft above the pattern altitude. in order to avoid aircraft in the pattern.

Responses from stakeholders representing gliding stated "if we arrive at the airspace boundary and we do not get a clearance for whatever reason our pilots would be exposed to significant risk, particularly if they are on the return leg." The airfields of Thornhill (north) and Strathaven (south) are conveniently located adjacent to the boundaries of the proposed Class D airspace. Thus the worst-case scenario for a glider running out of lift on the return leg of a cross country, and unable to get a clearance to transit the Class D would be to land safely at either Thornhill or Strathaven airfields.

Respondents questioned the need for the north east corner to be promulgated as Class D since the radar trajectory plots showed few aircraft using this area. The airspace design seeks to retain known (existing) boundaries which are well know and afford a simple airspace design. This seeks to minimise the risk of airspace infringements. Changing the boundaries in the manner suggested would add significant complexity to the boundary which would increase the risk of unintentional airspace infringement.

5. Summary of responses¹

Stakeholder groups

The initial mail distribution of the consultation addendum document to representative groups occurred on the 28th March 2011, to 96 organisations².

Stakeholder groups' responses	count	%
Responses with objections	5	5%
Responses in favour	7	7%
No response	84	88%

Table 1 Summary of numbers of responses from Stakeholder groups

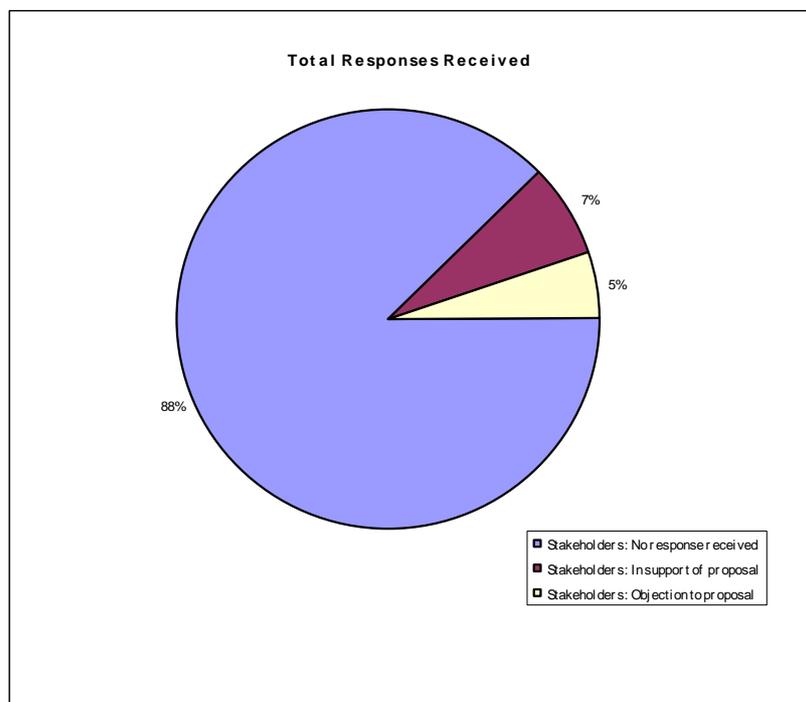


Figure 3 Stakeholder group responses

¹ The statistics presented here are for all Glasgow CTA consultation correspondence received by NATS up to the 1st May 2011.

² See the consultation addendum document Appendix A for a list of the stakeholders.

Stakeholder groups' responses	count	%
Aviation in favour	7	7%
Non Aviation in favour	0	0%
Aviation Objection	5	5%
Non Aviation Objection	0	0%
Aviation no response	69	72%
Non aviation no response	15	16%

Table 2 Breakdown Summary of numbers of responses from Stakeholder groups

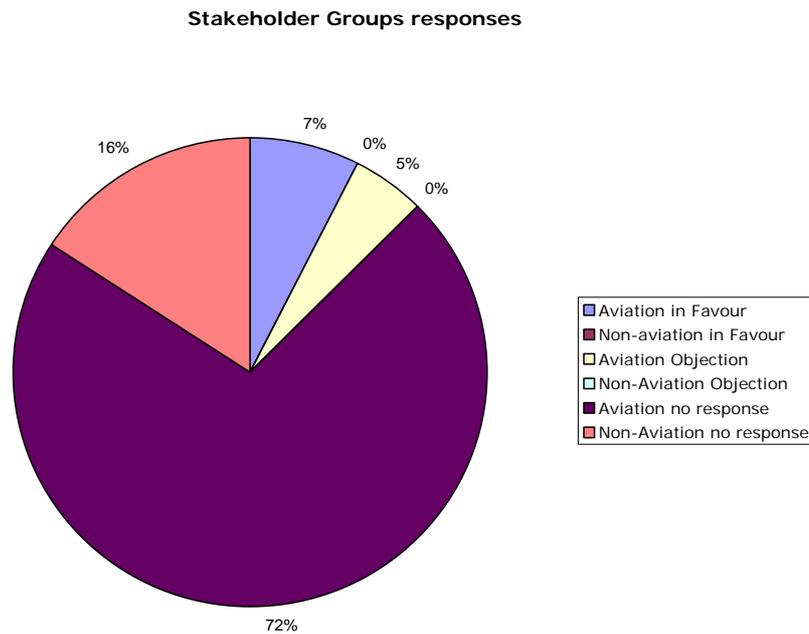


Figure 4 Stakeholder group responses

Other Responses Received

No responses to the consultation addendum were received from any stakeholders outside the list of Stakeholders published in the consultation document.

Total responses received

Since all responses were from stakeholders the total response results are as per the previous section.