DRAFT

ACP Feedback
NATS Manchester Room 805
Control Tower Building
Manchester AirporM90 2LP

18 January 2009

Dear Sirs,

MANCHESTER CONTROL ZONE ACP – THE LAA RESPONSE

Thank you for consulting the Light Aircraft Association (LAA) on proposals to return parts of the Manchester Control Zone to Class G Airspace. We are grateful for your initiative which we support. We do however have one or two points arising that we would like you to consider and either resolve or address in your submission to DAP.

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 and amateur but they fly mainly in day VFR conditions. Because of the structure of controlled airspace between the Mersey and Humber, access through and under the Manchester and Liverpool airspace is very important. The LAA has a high regard for air safety matters generally and the safety of flight at low level, especially in the low level route has been of concern to us. One of our priorities is promote the utilisation of airspace in a safe and efficient manner balancing the needs of all users.

Changes to Airspace Boundaries

The proposed changes to airspace boundaries will improve safety for VFR aircraft and reduce the risk of airspace incursions so we support the proposals.

Environmental

The proposed changes will allow VFR traffic to fly higher and will reduce its density. As IFR traffic routes and volumes will not change, this proposal will reduce the environmental impact of aviation in the Manchester area. Thus we support the proposal on environmental grounds.

Additional Comments

The Low Level Route – Airspace Classification

We agree that the rules relating to the LRR are anachronistic and it should be reclassified as Class G airspace. However, it has always been unclear to us the exact status of the LLR in relation to Rule 5 of the ANO. The UK AIP considers aircraft using various other routes (such as Fairoaks access) as being special VFR which waives the requirement to fly above 1000 ft above the highest fixed obstacle within 600m of the aircraft. The LLR, although Class D airspace is not so listed. Because of the terrain and obstructions, compliance with this part of the ANO Rule 5 is difficult and forces all aircraft using the LLR to fly at the exactly the same maximum altitude, increasing the risk of collision. Whilst the proposed additional 50 ft of headroom is useful, the issue will still remain.

We would be grateful if you would ask DAP to notify the revised class G LLR airspace for the purpose of Rule 5

<u>The Low Level Route – Upper Limit</u>

In para 4.1.2 of the consultation you say that you considered raising the upper limit of the LLR to 1500 ft altitude but discounted this because of the impact on vectoring procedures at Liverpool. We have reviewed the Liverpool procedures and note that an aircraft on a 3 deg glidepath on the ILS for 27 would cross the western boundary of the LLR above 2300 ft altitude. This suggests an upper LRR route altitude of 1800 ft. Looking at procedural approaches for 27 we see a platform altitude of 2000 ft and we can see no reason for vectoring below that outside the FAF at 5.9 DME when the glidepath is joined. As the closest point of the LLR to Liverpool is outside 7nm from touchdown on 27, an upper LLR attitude of at least 1500 ft is suggested. However, in these days of CDAs flying downwind at 1500 or 2000 ft AAL should be a thing of the past. We would expect the standard approach for public transport flights, vectored or otherwise to follow the 3 degree path to final, suggesting further raising the LLR upper limit. It may be that Liverpool wants to use lower altitudes when vectoring training flights but we see no absolutely no reason for establishing CAS for that purpose.

It is clear to us that aircraft and their occupants using the LLR not above 1300 ft altitude incur a greater risk following engine failure than were they at; say 2000ft where there would be more time and increased options. Moreover, when a pilot attempts to land clear following engine failure, they face a greater challenge at the lower altitude and this transposes to a greater risk to persons and property on the ground. In addition, the increased risk of mid-air collision resulting from the altitude constraint also increases the risk to persons and property on the ground as well as to aircraft and occupants. We believe that we and you have a duty to minimise these risks by setting the LLR maximum altitude as high as practicable and we are not convinced that the "negative impact on Liverpool vectoring" is necessarily sufficient to discard this. We

would be grateful if you would reconsider this aspect and draw our safety concerns to the attention of DAP in your submission.

The Low Level Route –Lateral Limit

Turning to Para 4.1.3 on lateral limits, you say that the lateral limits are more than adequate but we disagree for similar safety reasons already discussed. Widening the LLR would reduce risk to aircraft, occupants and persons and property on the ground as well as reducing the risk of airspace incursion. We would like you to tell DAP that we disagree with you most strongly on this point. The additional fillet to the north-east is a lateral improvement but we see no reason why the LLR should not be expanded to the south-west. Presently the Winsford - Northwich conurbation has to be overflown in the LLR but there is open country to the south-west and there seems no reason it should be reserved as part of the Liverpool CTR. Indeed it appears that this whole area could be released to class G making VFR operations safer.

It is clear that Manchester traffic does not use this airspace as it is beyond the LLR. Liverpool public transport traffic has no business being at 1750 ft or below in the "Oulton Park" corner, 12 nm from the aerodrome. The only Liverpool SID or STAR we can find that is relevant to this area is the NANTI SID and that has a constraint above 3500 ft altitude by WHI suggesting that CAS is not needed below 3000 ft. We would be surprised if traffic was constrained below 4000ft in this area. Indeed the whole CTR south of a line between Jodrell Bank and Neston appears to have no public transport protection purpose.

It may be that you have not considered the CTR to the west because it is Liverpool airspace. If that is the case, perhaps you will tell us and draw both Liverpool and DAP's attention to our concerns, conveying our request that Liverpool reviews the need for this airspace. If necessary and appropriate we would be willing to sponsor an ACP for that area.

The Revised CTR –Lateral Limit

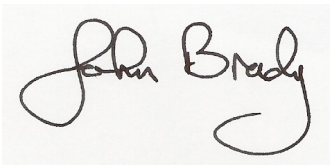
Turning to lateral limits of the Manchester CTR in the south-east, again we have difficulty finding a public transport reason for not cutting off the corner of the CTR at its south-western extremity, south of the centreline of 05R, perhaps toward Holmes Chapel. Certainly making this corner where the M6 crosses the railway from Crewe would make a good navigational feature.

We also have some difficulty understanding the rationale for the most south-eastern point of the CTR. Given that Woodford does not normally operate public transport flights, we see no reason to provide protection beyond its ATZ which would suggest the revised boundary of the CTR could be taken back on a line towards Glossop. Perhaps you would let us know the rationale behind this boundary of the CTR.

Conclusion

We are most grateful for your initiative in bringing this change forward and we hope you will be able to consider our additional points of inquiry without disrupting your submission timescale.

Yours Sincerely



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