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Dear Lou,

**PROPOSED CHANGES TO AIRSPACE CLASSIFICATION OVER
CENTRAL SCOTLAND**

The Light Aircraft Association (LAA) has recently responded to the NATS consultation on proposals to change the classification of the Glasgow CTA from Class E to Class D. Although we supported the principle that public transport aircraft using Glasgow should have a level of protection equivalent to that afforded by Class D airspace, we were very concerned that the consultation document based its arguments and proposal on substantially false information so that many consultees will have been misled. We consider that honesty is fundamental to the consultation guidelines so I write to draw your attention to the matter.

A copy of our full response will be available from NATS but I summarise the key points below with references to the paragraphs in the NATS consultation document:

The executive summary states that “there will be no change to the way aircraft fly through the airspace” but many aircraft will have to fly lower over populated areas and mountainous terrain increasing risk to aircraft, occupants and persons and property on the ground.

Para 1.2 sets out the case for change based on growth and projections of passenger numbers and many consultees will accept that but the need for airspace is driven not by passengers but by the number of aircraft movements which has not grown (para 8.11).

Para 8.11 cites 108,000 commercial movements in 2007 but that is actually the total number of all movements as listed in CAA statistical tables. The proposal repeats the misleading data for all other years and it conveniently omits data for 2008 with only 86,109 such movements; a significant decline in traffic.

Para 5.1 then uses these erroneous figures in the statement that “commercial flights using the airport must fly through Class E airspace” but that is not the case. Most go nowhere near Class E airspace.

Para 7.1 develops this falsehood further saying “the majority of flights which operate in and out of Glasgow airport fly through the (Class E) CTA”. This is clearly not true and in our full response we make an estimate of the actual traffic exposure to Class E airspace using CAA data as its basis. We estimated that on average about 2 movements per daylight hour may fly through the CTA.

In relation to para 7.1 we also noted that Glasgow SIDs, STARS and approaches all appear to be drawn within existing Class D airspace (except for one minor incursion which could be corrected) but consultees are not made aware of this.

Table 3 in para 8.13 represents the listed traffic levels as being typical of a busy day but 10 Oct 08 was actually the Friday of the autumn half term in Glasgow which sees probably the largest surge in traffic anywhere in the UK. Over several years I have ferried extra aircraft into Glasgow for that surge but most consultees, especially those remote from Glasgow, would not be aware of the significance of the date.

Figure 3 in para 8.10 is also represents the 28 Jun 08 as typical when it was the first day of the Glasgow school summer holiday which sees another surge in movements of which consultees would be unaware.

Figure 3 (and the other figures) shows traffic at all levels not just within the CTA volume of 2500ft to 6000ft altitude. Therefore the statement in para 8.10 that this “illustrates the airspace (i.e. the Class E CTA) is well used” is seriously misleading.

Para 8.10, figure 2 depicts the subject airspace and traffic flows in a different geographic location to where they actually are.

Para 7.4 describes the collision avoidance problem with fast moving commercial aircraft. However, commercial aircraft must maintain 250kts or less below FL100 and the upper limit of the CTA is only 6000ft. Moreover, NATS tell us this risk occurs in the critical approach stage of flight but we know that even in the intermediate approach, commercial aircraft will reduce to 210 kts and then normally to 160kts on final approach.

Para 8.4 says (in essence) that the vertical or lateral boundaries of existing CAS cannot be changed without significant detriment. However, we now know that NATS offered certain stakeholders some changes in both dimensions. Moreover, the statement that “changes to the vertical profile of the airspace would restrict NATS’ ability to offer CDAs” is completely untrue. But most stakeholders will be unfamiliar with the CDA concept and profiles so will accept the NATS statement as fact.

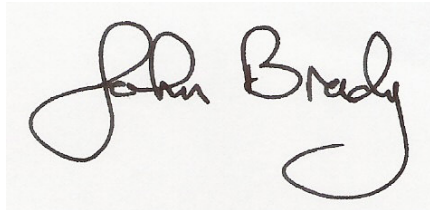
Further, in para 8.4 NATS say that reducing the dimensions of CAS would reduce ATC flexibility, leaving consultees with the impression that this is a limiting issue. However, we calculate that Glasgow has some 3 times the CTR of Gatwick but with only one third of the traffic suggesting that they have about 9 times the flexibility they might reasonably need. The vast majority of consultees will not be aware of such comparison and will be swayed by the NATS statement.

Para 8.3 paints a picture of complex coordination and avoiding action taken at critical stages of flight suggesting a fraught safety situation which will have had a big impact on consultees. However, using CAA traffic data and NATS tables we were able to estimate that vectoring to avoiding traffic which might be in the CTA occurs about once every other day.

Other misleading arguments are developed in the consultation but in general these flow from the issues described above so I have not repeated them here. In our view, the erroneous statements made in the consultation are sufficiently significant and numerous to mislead consultees into believing that the case for change is much stronger than it is. Moreover, given the extent of the misleading data, it is difficult to believe that this was the result of simple error.

We would be grateful if you would consider our concerns.

Yours Sincerely



John Brady
Vice Chairman