

## **General Aviation Alliance (GAA) response to the Norwich International Airport Airspace Change Proposal: Post Implementation Review.**

### **The General Aviation Alliance**

The GA Alliance is a broadly-based grouping of General Aviation (GA) and Sports and Recreational Aviation (SRA) organisations, with a total of 72,000 members in the UK, involved in a variety of aviation activities and sports.

The GAA aims to co-operate and consult with government, regulators and other organisations to support and progress GA interests. The views expressed here represent the collective views of GA Alliance members.

### **Response data collection**

Following publication of IN-2013/038 the GAA asked members of its constituent Associations and Groups to publicise details of the Post Implementation Review (PIR) to their members through their magazines, web sites and newsletters. Details of the PIR were also published in aviation magazines and third party web sites and forums.

Responses were invited from all pilots to help inform the GAA response to the PIR.

#### **1) Access to the airspace**

- a. There were no reports that access had been denied to the airspace at any time.
- b. There was one report from a pilot who made an initial call for airspace access which was acknowledged and then, after waiting some time for a clearance with no further response, chose to route around the airspace instead. He reports that in his view the frequency was not busy. He felt that the delay in response was too long and caused him to extend his route into an area considered to be a choke point which increased the risk of collision. The event took place on 27 March 2012.
- c. All non-radio traffic has had to plan to route round the airspace as access is impossible. Similarly soaring aircraft typically cannot afford to be given no clearance, or one that would terminate the flight early and so even if radio equipped and licenced will also have tended to plan to go round CAS.
- d. There was some suggestion that RT equipped powered traffic may choose to avoid the airspace and route around it to save any potential for refusal.
- e. Balloon pilots have found the established airspace restrictive because the requirements for VFR flight visibility have increased from 3Km, VFR outside controlled airspace, to 5Km, VFR within controlled airspace. Balloons often fly in early morning when the visibility, due to haze, can be between 3Km and 5Km. The increased minimum has meant that some take-offs are delayed waiting for increased visibility by which time wind conditions can have changed and prevented the flight.

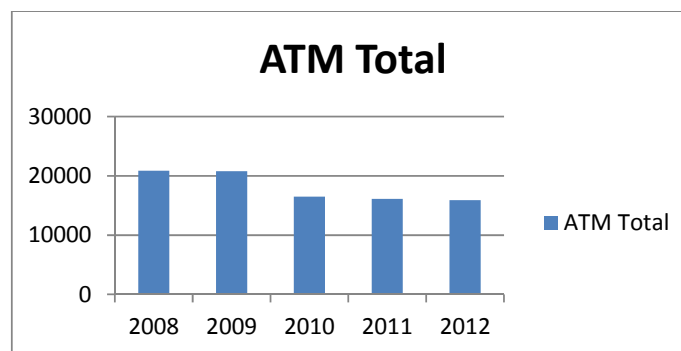
#### **2) Interaction with ATC**

- a. Pilots reported that ATC were always helpful and the less experienced pilots that responded said that they were assisted by the ATC staff and had now grown more confident in using the radio and calling for transits.

- b. Two Hang gliding/paragliding clubs attempted to negotiate some access to the CAS but were rebuffed. Unfortunately due to changes in Officials the Clubs' side of the communication is not available to us. However we trust that Norwich's records will show the contacts and resultant correspondence.

### 3) Size of the airspace

- a. Whilst the PIR does not consider the validity of the original application a responding pilot considered that the level of traffic activity in the general area, Norfolk, was considerably less than in previous years and that he felt that the size of the controlled airspace was disproportionate to the activity.
- b. The graph below illustrates that fixed and rotary wing activity at Norwich has reduced in the last five years by 25% (21,000 to 16,000).



A basis for the establishment of the Norwich controlled airspace was an expected significant increase in commercial activity and the need for that increased activity to be efficiently operated for the benefit of the increased passenger numbers.

At the time that the ACP was initiated, April 2009, the forecast was for growth between 2009 and 2012 of 38% (21,000 to 29,000 movements) with passenger number increasing 66% (550,000 to 912,000). It appears that the planned increase has not happened and this must call into question the need for the airspace granted as a result of that application.

- c. It is noted that the design of the airspace does not appear to be operating as intended because a part of it is unused. An accepted recommendation of the 21st Century Class G work was that:

"8.1.3 Controlled airspace and other measures should only to be established where there is a demonstrated need for such airspace...."

However, part of the Norwich CTA appears not to be needed for any procedure. The attached area chart depicts a CTA extension to the South-East between 2500ft and FL50 and at first sight appears to be designed to contain the LOC/DME 27 alternative procedures for Cat C & D aircraft (we attach the chart). We do not think that Cat C & D aircraft use Norwich and if they did they are unlikely to need an alternative procedure when the primary procedure and all holds are drawn north of the centre line. However, we note that the LOC/DME 27 alternative procedures all commence at the NWI at altitude 2000ft. So the alternative procedure does not use that airspace which is established at 2500ft and above. It might have been established as protection for a hold but all the holds are north of the 09/27 centreline so that does not appear to be its purpose either. If this element of the airspace is indeed not necessary to meet the purpose of the airspace perhaps it could be removed in accordance with the 21st Century Class G policy and CAP 725.

- d. As responders the GAA realise that the PIR does not set out to review the detail of the original application however we would like to take this opportunity, taking into account the movement data above, to suggest that a Radio Mandatory Zone (RMZ) of a more suitable size might be a simpler and more appropriate solution to the requirements of airports such as Norwich than the establishment of Controlled Airspace. We realise that this was not an option at the time of the Norwich application.

#### 4) Safety

- a. One pilot considered that the establishment of the Norwich airspace had improved safety because as a frequent user of Norwich he was now operating in a known traffic environment.
- b. The winch towing operation at Great Fransham located between Norwich CAS and Marham commented upon a significant increase in traffic passing over and around their operations. More aircraft in the same volume of airspace can only increase the risk of collision.
- c. One pilot considered that safety had been reduced by preventing his use of the airport in IMC. His comment was:

*“as an IMC pilot, I can no longer recover to Norwich, due to the SVFR limits , on instruments. This severely limits my safety options and would force a divert to Cambridge under IMC. For me, then, it's got worse with respect to safety.*

#### Conclusion

The responses collected by the GAA indicate that overall airspace users are being allowed access to the Norwich controlled airspace by request and have little criticism of the day to day operations.

The reduction in movements at Norwich between the time of application and the present day calls into question the validity of the original application and the need for the established controlled airspace to remain in force.

The forthcoming introduction of an RMZ option should be considered for Norwich. This could offer proportionate protection to a carefully designed critical area and avoid today's large volume of controlled airspace, much of which appears to be designed to serve procedures which are rarely if ever used.

31/05/2013