

Airspace Regulation (attn. Clive Grant)  
Safety and Airspace Regulation Group  
CAA House  
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London  
WC2B 6TE

20160513-FASVIG-SouthendPIRresponse

13<sup>th</sup> May 2016

Dear Clive

### **London Southend Airport CAS PIR**

1. FASVIG has a number of observations concerning the PIR for Southend Class D airspace. These are drawn from the principles of FAS and have been highlighted by our ongoing work with the Farnborough airspace review. Although our report has yet to be published, by the time you need to publish responses to this PIR it should be in the public domain.

#### **Upper Limit of Clearance**

2. We were briefed by TAG Farnborough that they had sought advice from Southend as to how they manage a Class D CTR/CTA when it is overlaid with Class A. As a result of that they told us that VFR aircraft with no transponder in Farnborough airspace would be constrained to 500ft below the upper limit of the Class D and that this was in compliance with a directive from the CAA. However, we now understand from the CAA that there is no such directive. We suggest that if Southend is applying such a restriction it should be removed.

#### **Coordination with Adjacent Aerodromes**

3. We believe there may be a coordination issue for aircraft entering the zone from the south which are obliged to contact Rochester for ATZ crossing but the time available from leaving the ATZ to reaching the Class D boundary is too short to obtain a clearance if the frequency is at all busy. Although we have no direct experience of it, similar considerations must apply to aircraft departing Rochester to the north. Without a clearance aircraft are constrained below 1500ft amsl increasing unnecessary risk and intrusion. At other commercial airports it is common for one unit to issue a clearance on behalf of the other ATS unit and in this instance it might be useful for Southend to arrange a coordination process with Rochester to make the airspace more welcoming. Coordination is one of the keys to safe and efficient airspace in the busy south-east and we would welcome CAA support to deliver it.

#### **Access for Non-Radio Aircraft, Gliders and Hang Gliders**

4. Following our recent work with TAG and various gliding organisations it is clear that gliders, hang gliders, paramotors and the like are not normally able to access Class D airspace so avoid the area without asking for a clearance. Because these do not feature in the ANSP refusal statistics this exclusion is not recorded but does

exist. Of the 20,000 aircraft on the UK register and the 7000 or so unregistered UK aircraft, about 10,000 fall into this category and tend to be excluded from CAS.

5. With Southend commercial traffic reducing month on month since before the establishment of the CAS there should be room for this excluded traffic inside the CTR and CTAs but it would need special arrangements. These could be based on LOAs and perhaps the French AIC on glider RT procedures that we know the CAA is aware of. Perhaps the ANSP could promote such a change through the various S&RA organisations and if need be FASVIG could facilitate that. We recognise that whilst LoAs can permit access for some specific regular scenarios they can only provide limited mitigation of the CAS access issue for these 10,000 aircraft but nonetheless it is needed.

### **Terminal Airspace Design Policy**

6. When EasyJet began operations at Southend the LAA established a collaboration with Southend ATC which would enable them to better manage GA aircraft whilst minimising CAT exposure to risk in Class G. To facilitate this, Southend would not clear departing aircraft to take-off until they had a clearance to climb directly into the London TMA and the LAA would promote the use of Southend ATSOCAS to GA pilots. Unfortunately, although EasyJet reported that this worked well. Southend later abandoned the arrangement unilaterally. Subsequently CAT aircraft flew extensively below the TMA until TC were able to merge them into the main London airport's traffic and that process and routing is now established as discreet blocks of CAS for the sole use of Southend traffic. However, innovative air traffic coordination tools are now available which could coordinate Southend departures and arrivals into the TMA, automating the manual procedure that was originally in place and mitigating the need for this additional controlled airspace and enabling efficient airspace sharing.

7. The CAA will be aware that in our report on Farnborough airspace we will be proposing that the establishment of additional layers of CAS below the London TMA to serve one airport is negating the benefits that lie at the heart of the FAS deployment programme and represents outdated design practice. The consequence of the present Southend design is that the founding principle of the FAS, that of balancing the needs of all airspace users is not being met. Commercial Air Traffic is now consuming more controlled airspace than it needs and is not using it efficiently when the solution already exists and is already funded.

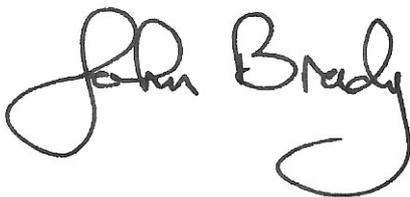
8. The approach to airspace design could be made radically different if the ANSP took advantage of both departure and arrival management tools in use at Heathrow and Gatwick. Both airports operate Airport Collaborative Decision Making (A-CDM) tools that if deployed to the airports north of London would allow NATS to coordinate Southend departures and arrivals as the ANSP can receive real time traffic information simultaneously from other airports. This information contains data concerning the departure and arrival of all aircraft using the airports and utilises predictive tools to provide a high degree of accuracy of the traffic situation in the TMA. This enables tactical management of the aircraft flows without the extensive layer of additional CAS.

9. All of this information is freely available to NATS and its use to offset the need for additional controlled airspace is essential for modern airspace. It would not seem difficult to amend the algorithms within A-CDM to include Southend traffic which averages less than 33 CAT movements per day (over the last year). We are aware that positive investment proposals for A-CDM at Stansted (and Manchester) have already been delivered to MAG. Moreover, European funding of up to €3.0bn has been made available to airports, airspace users and ANSPs to deploy air traffic management functionalities such as these, all of which is designed to modernise the way in which traffic will be managed in future in situations exactly like Southend. So a better airspace solution is now available.

10. We propose that the CAA should direct London Southend Airport and other north London airports to examine the tools and procedures now available with a view to modernising its operation in this congested airspace as envisaged by the vision of the Future Airspace Strategy.

11. We intend to propose to FASVIG that the roll out of A-CDM and the consequent reduction in the need for CAS should become a core part of the FAS programme and we will be looking to the CAA for policy support on that. Meanwhile it would be useful to know how you intend to proceed with our proposals on the Southend CAS.

Yours sincerely,



John Brady  
Joint Chairman  
FASVIG