



17 September 2017

Dear Sirs

Leeds Bradford Airport Airspace Proposal (LBA ACP)

Thank you for the opportunity to respond to the above proposal published on 14th July 2017. The Pennine Soaring Club have serious reservations about this proposal, its justification and the effect it will have on airspace users in the region, in particular those flying paragliders and hang gliders.

The Pennine Soaring Club.

We have a consistent membership base of nearly 200 Hang Glider and Paraglider Pilots based in the Pennine district with a range of sites to suit each wind direction around the Ribble valley and North of Manchester. The paragliders are very much in the majority. Our activities are similar to those of Sailplane pilots with some important differences.

Rather than sharing club aircraft, each of our members has his/her own aircraft, often more than one. Paragliders fit into a backpack and the complete kit of wing, harness, reserve parachute, helmet and flight instruments typically weighs around 15kg. This is usually carried up a hill facing directly into the wind in order to soar in the rising air and search for thermals in order to gain more height. There are currently no winch-launching facilities for paragliders and hang gliders in our region. If conditions are favourable cross country flight is then possible by climbing as high as possible and then gliding away in search of another thermal and then circling within it to gain height again. Many long flights have been made from our sites in the Ribble valley, terminating on the East coast. Most cross-country flights are downwind. Due to weight restrictions we cannot carry airband radios or transponders and so we cannot enter controlled airspace which is effectively closed to us.

Paragliders have a very slow airspeed of around 35-40 km/h and a very poor glide angle (compared to sailplanes) of around 10:1 at best. Hang gliders have a much better performance, somewhere between Paragliders and Sailplanes, but because of their greater weight and bulk are now far less common than paragliders in our club, and so are rare visitors to our sites.

We are not the biggest club in the country, but in recent years our members' cross-country flights have placed the club at the top of the UK XC league several times. We are, of course, affiliated to the British Hang gliding and Paragliding Association (BHPA), and draw members mainly from the surrounding area but regularly receive significant numbers of visitors from all over the country and abroad.

Cross Country flying (XC)

Many of our members find the planning and execution of cross country flights the most satisfying aspect of the sport. Detailed knowledge of the weather, airspace on the planned route, local conditions etc is required, as well as the skill to seek out and exploit the areas of lift en route. Flights of over 100 kilometres are now common and many flights of 200km or more have been achieved. There is a highly competitive and well run XC league in which many of our pilots actively compete by submitting track logs which are scrutinised carefully for any airspace violations and displayed online for all to see. <http://www.xcleague.com/xc/leagues/view-1.html>. BHPA rules require that any pilot leaving the launch site to fly cross-country must have achieved the BHPA 'Pilot' rating or above, and satisfied the examiners in all aspects of flight, with particular emphasis on airlaw and navigation as well as gaining sufficient flying experience.

Due to restrictions to the south caused by Manchester Airspace the best and longest flights from our sites are to the east and northeast, aided by the prevailing westerly and south westerly wind directions. On rare occasions, our most highly-skilled pilots have been able use a NW wind to thread the narrow gap between the Leeds-Bradford CTA and Manchester CTA over Huddersfield (see 'Huddersfield Gap', Appendix B), despite the height limit of 3500'. This is a rare occurrence, and most XC flights in a NW wind come to an abrupt halt at the edge of controlled airspace. Appendix A shows a composite of flights passing north of the existing Leeds Bradford CTA.

Most serious XC pilots share their planning online and are then willing to travel large distances to gain a good flight. This means that our pilots regularly fly on the sites of neighbouring and even distant clubs and that, if conditions are forecast to be good on our sites, we receive large numbers of visitors ourselves on some days. We therefore share the concerns expressed by other clubs in the region (The Dales Hang Gliding and Paragliding Club, The Derbyshire Soaring Club. and the Cumbria Soaring Club among them) about how the Proposal may affect them

Effects of the Proposal on our activities:

The Yorks, Derbyshire & Nottinghamshire Regional Soaring Airspace Group (RSAG) has examined the proposal in detail, consulted aviation experts and submitted its own response to the proposal. The Pennine Soaring Club fully supports the evidence presented and the conclusions reached therein. The purpose of this response is to draw attention to those aspects which affect the PSC in particular.

The main effect would be a limitation on our ability to pass the Leeds Bradford CTA to the north, restricting access to the Vale of York and the coast. Appendix A shows that there are many tracks passing through the areas which would be covered by CTA 7 and CTA 8. With a proposed lower limit of 3500' these extensions would severely compromise our ability to transit this area; CTA1, CTA2 and CTA3 having a lower limit of 3000' are effectively barriers to our flights given the narrow ground clearance here. Paragliders with their limited performance are severely compromised when attempting to fly cross-wind, so avoiding airspace often means the end of an otherwise excellent flight. Appendix A also shows several flights terminating before entering the existing airspace, or after a short glide under it. This would seriously affect the safety and practicality of our sport but would also have major negative safety implications for all users of the area, with pilots dividing their attention between searching for lift and keeping clear of controlled airspace as well as watching out for other aircraft. Safety outside the controlled airspace is considered outside the remit of the

proposal. We feel that this is a very inappropriate attitude, since it is the reduction in available manoeuvring room that is compromising safety.

Some consideration of our concerns appears to have been given in the proposal, but little has been done to allay them. As well as our concerns over the effects of this proposal in our own region, many of our members are associate members of, and regularly fly the sites controlled by, the Dales Hang Gliding and Paragliding Club, Derbyshire Soaring Club and Cumbria Soaring Club so we echo their concerns regarding flights from their sites, as detailed in their responses. We, the PSC, are principally concerned that there appears to be no consideration of the effect of this proposal on flights to the East from our sites.

This is described as 'the best compromise we are able to achieve' but there is little sign of any compromise in spite of the clear recognition of the problems that would be caused to us and the rest of the gliding community. We would like to respectfully request that the lower limits of CTA 7 and CTA 8 be increased substantially during daylight hours to 5500'. The occasions when paragliders and hang gliders from PSC sites would wish to transit this area only occur during good soaring conditions when there is a significant westerly component to the wind direction

Safety concerns:

The proposed changes would have a marked and largely ignored negative effect on the users of the airspace to the north of the proposed extension. The effect will be to squeeze existing users into a smaller block of space.

The particular performance characteristics of paragliders are worth re-emphasising here. As mentioned earlier, we progress on an XC flight by circling in the lift offered by thermals to gain as much height as possible and then glide off downwind to try to find another thermal before running out of height and being forced to land. It follows that if the ceiling is lower we will not be able to climb so high or glide so far and even if we do find another thermal we will need to find it in a shorter distance and on average will need to find more thermals to progress the same distance. Where the ground rises up to wards the lower limit of controlled airspace, this severely limits the amount of time a paraglider pilot has to search for lift, all the while keeping aware of their position, looking out for other aircraft and searching for possible landing fields. The more difficult conditions will also lead pilots to resort to more cautious tactics: rather than risk a glide off downwind they will be more likely to stay with any bits of lift that will maintain their altitude and drift with the wind ('drift tactics') and be more likely to fly in groups so that any lift is easier to spot and reach ('gaggle flying').

All of these factors will result in a marked decrease in the speed at which paragliders transit the area, and a corresponding increase in the time spent within it, exacerbated by its increase in length. Thus other aircraft are more likely to encounter groups of almost stationary objects circling in the top half of the airspace as well as individuals grovelling near ground level or climbing and, again, quickly forming into groups.

General concerns about the proposal and consultation

We are concerned that the process leading to this proposal has resulted in a shifting ground of justifications, and the resulting scheme is over-complex and lacks a real clarity of vision over why these changes are necessary

- The justifications for this proposal seem to have evolved several times, including increasing growth, compliance with procedures, environmental and fuel-saving concerns etc. Given that the evidence seems to show a decline in aircraft movements (the RSAG response contains detailed data - we support their argument in this and see little point in repeating the same figures).
- Regarding safety and the difficulty of keeping flights within controlled airspace. Can we take at face value the claim that the CAA will not allow the steeper flight paths of which modern aircraft are capable and which most pilots seem to prefer in order to gain or to maintain as much height as possible for as long as possible? Height is an obvious safety factor that allows pilots time and options in case of any changes or difficulties. While we lack the knowledge to challenge these claims, they do need to be looked at in detail, especially in light of statements from NATS's Martin Rolfe that the capabilities of modern aircraft in both ascent and descent mean that we should expect less airspace rather than more! Given also the flawed assumptions re growth, surely the safety of users could be maintained within the existing airspace or even a reduced amount.
- If we look at the environmental argument, then while the figures presented suggest impressive fuel savings, these are insignificant in percentage or overall terms and do not justify the safety and proportionality sacrifices detailed above.
- Surely it would be best to wait for publication of the Future Airspace Initiative, so that we could genuinely assess that this proposal really is in line with the future of air traffic control in the UK

Summary Concerns:

- The effect on users in the more restricted airspaces bordering those proposed has not been assessed, this is a serious omission and needs to be addressed urgently.
- The air-traffic expansion claims need re-assessing in the light of the current economic climate and the unknown effects of BREXIT. This proposal should be delayed until after publication of the FASI to judge its relevance to local and UK requirements
- If parts of this increase in controlled airspace are not needed between 0900 and 1800, it is difficult to see why it is needed at all. Any such increase in the space where we can fly would be welcome, but this provision of a variable lower limit seems to undermine the case being made.

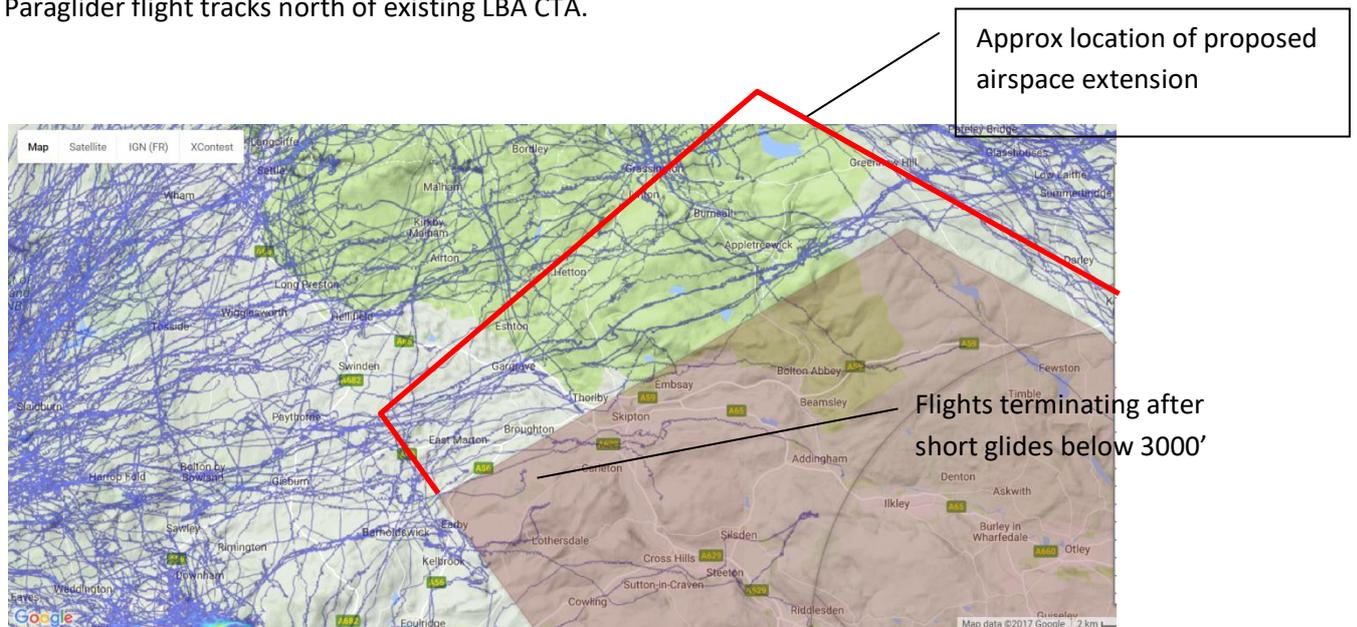
Suggestions

CTA 7 and CTA 8, as well as CTA 1, CTA 2 and CTA 3, represent a significant problem when making a cross country flight by paraglider. A combination of prevailing wind direction and local geography means that a very large proportion of flights from our main sites pass very close to the north of the existing airspace, and significant effort and skill are required to maintain a heading that avoids the existing CTA. Any paraglider pilot down below the 3500' ceiling of the proposed CTAs at this point has little chance of progress given the narrow slot between the high ground and this ceiling - he will not glide very far, and even finding a thermal with such a limited ceiling will offer little comfort.

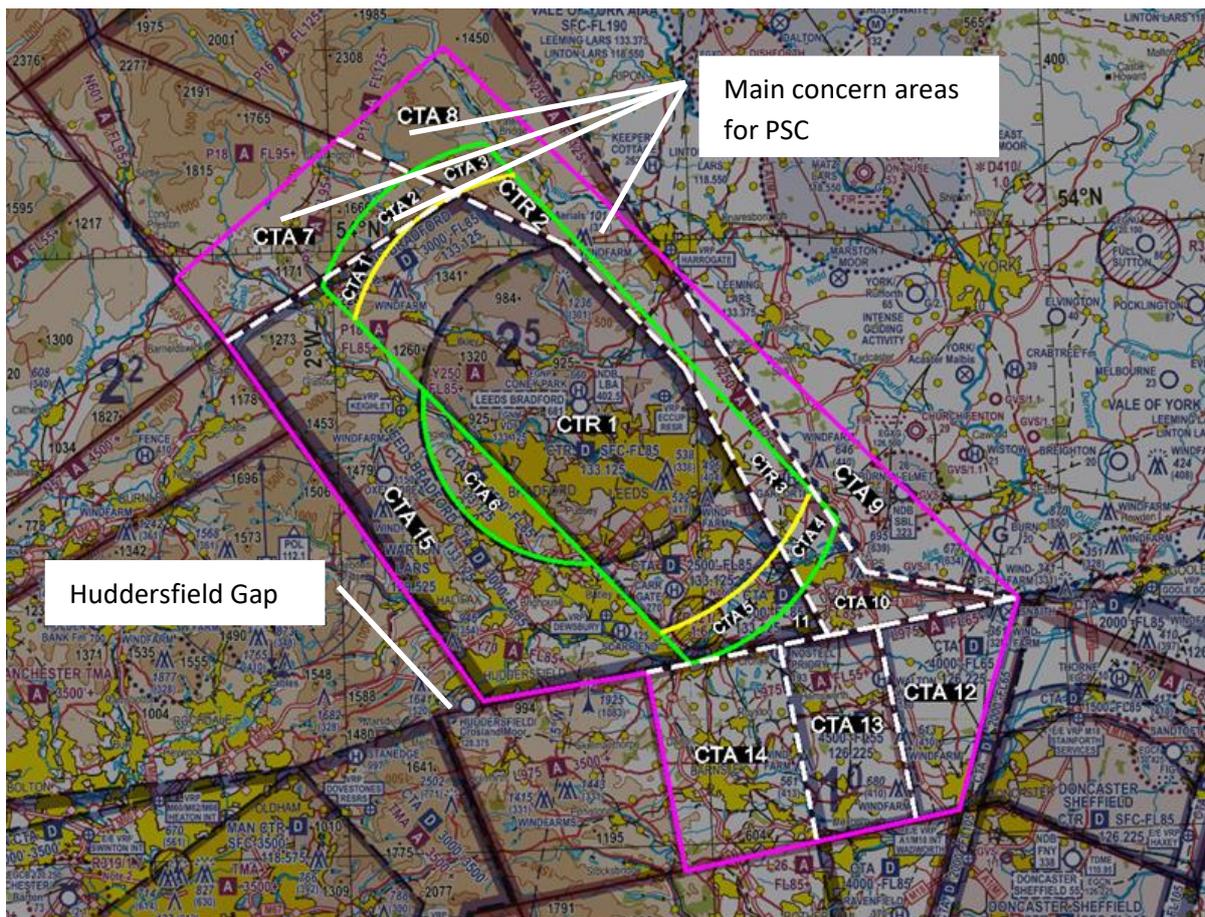
We request a significant increase in the lower level of CTA 7 and CTA 8 to at least FL55 during the hours 0900 - 1800, and an increase in the lower limit of CTAs 1, 2 and 3.

Appendix A

Paraglider flight tracks north of existing LBA CTA.



Appendix B - Proposed Airspace



Graham Jones
Chairman
Pennine Soaring Club