

Review of Irish Airspace

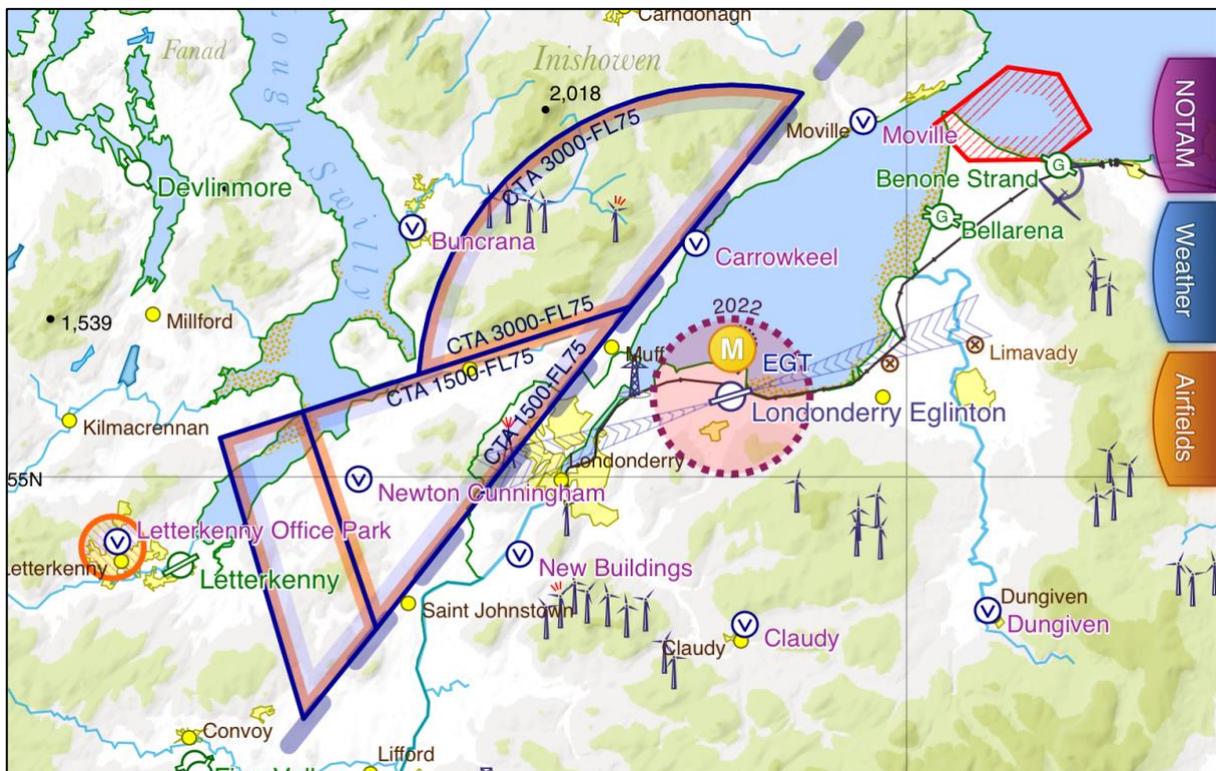
I write this submission as a General Aviation pilot, Flight Instructor, Examiner and transport category aircraft Training Captain. The lower airspace structure in Ireland has been outdated for many years and I welcome this opportunity to comment on future changes. I sincerely hope that the comments and feedback of the general aviation community are taken seriously.

In general terms, my comments address the size, shape and classification of controlled airspace. I have expanded on each of these areas in the points below.

Control Zones

The size and shape of control zones at regional airports are not appropriate for the types of traffic operating from these airports. The City of Derry Airport is an excellent example here. If on an instrument approach to runway 08 in the Shannon FIR, you would be in Class C controlled airspace until you cross into the Scottish FIR after which you would be in Class G uncontrolled airspace. The City of Derry Airport regularly handles medium size jet transport aircraft. In fact it handles more medium size jet transport aircraft than most of the Irish regional airports. Is there a flaw in the UK CAA Risk Assessment, and if so, has this been highlighted?

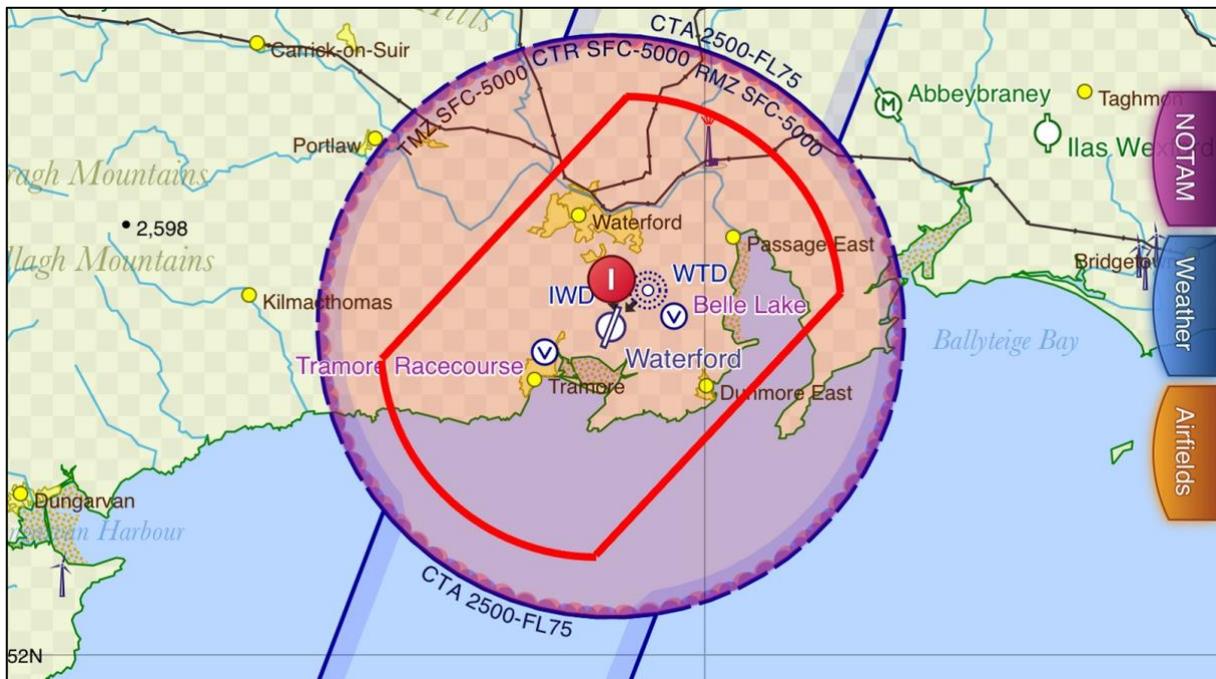
The City of Derry Airport are currently undertaking an Airspace Change Proposal to introduce GNSS approaches to the airport. This process is fully transparent and available to the public. According to the latest documents from that ACP, the only changes to airspace that may take place will be within the Shannon FIR.



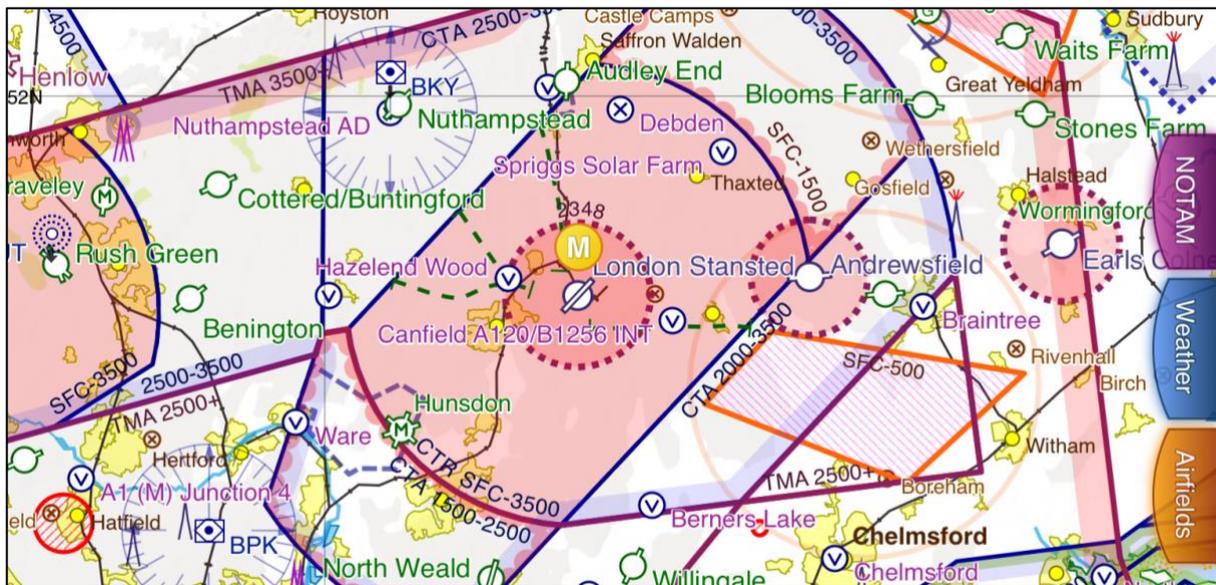
Class C controlled airspace in the Shannon FIR but the City of Derry Airport itself is in Class G Airspace

While I'm not advocating that regional airports are redesignated as Class G airspace, I'm highlighting the two extremes from two neighbouring 'Competent Authorities', operating until recently, under identical rules. With that in mind I believe a happy medium can be achieved that will give optimum results to commercial air transport and GA traffic.

A sensible middle ground would be to extend control zones in the approach direction from the ARP to 8NM and to 6NM either side parallel of the centreline. I have friends and colleagues from the NMAI that operate private airstrips inside existing control zones that are significantly inconvenienced by the presence of controlled airspace when there is no operational need for it. It was also pointed out at the recent online consultation by the ANSP that controllers don't want to control aircraft that they don't have to, so why burden them with unnecessary workload. Accident and incident reports regularly point to a distraction in the error chain that leads to incidents and accidents. Why are the IAA accepting this latent threat when it would be prudent to eliminate it?



The Waterford Control Zone with the dimension of the London Stansted Control Zone superimposed on it (Class C Airspace).



The London Stansted Control Zone (Class D Airspace)

Instrument Approach Procedures

As a commercial pilot, I understand the requirement for containing all instrument approach procedures within controlled airspace. However, the existing airspace design was heavily based on outdated technologies such as NDB, DME Arcs etc. With the introduction of PBN and RNP specifications, IFR traffic can achieve very high levels of ANP and therefore the lateral protections are no longer required to be as big. I referring here to the CTRs and the CTAs.

CCOs & CDAs

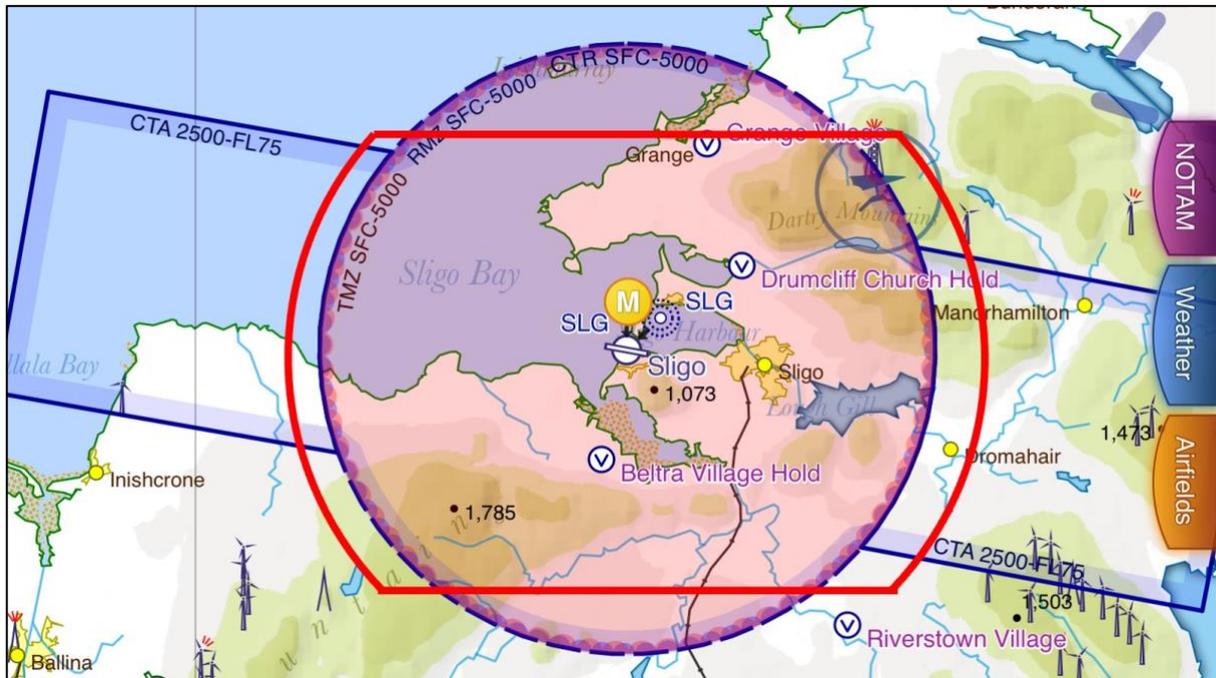
The AIC refers to optimising airspace design for CCO and CDA operations. Having flown a medium sized jet transport aircraft in and out of the majority of regional airports in Ireland, as well as the three international airports, I don't recall ever not being able to achieve a CDA. Without exception I've always been able to achieve a CCO. Of course the exception here is the Point Merge system in Dublin which introduces significant fuel and environmental inefficiencies. I accept the point by Declan Mangan from Shannon that there are certain points inbound to Shannon that may require additional 'stubs' to permit CDA's however these should be limited to tracks towards the 'T Bar' and not a widespread lowering of the base of controlled airspace.

Reclassification of Controlled Airspace

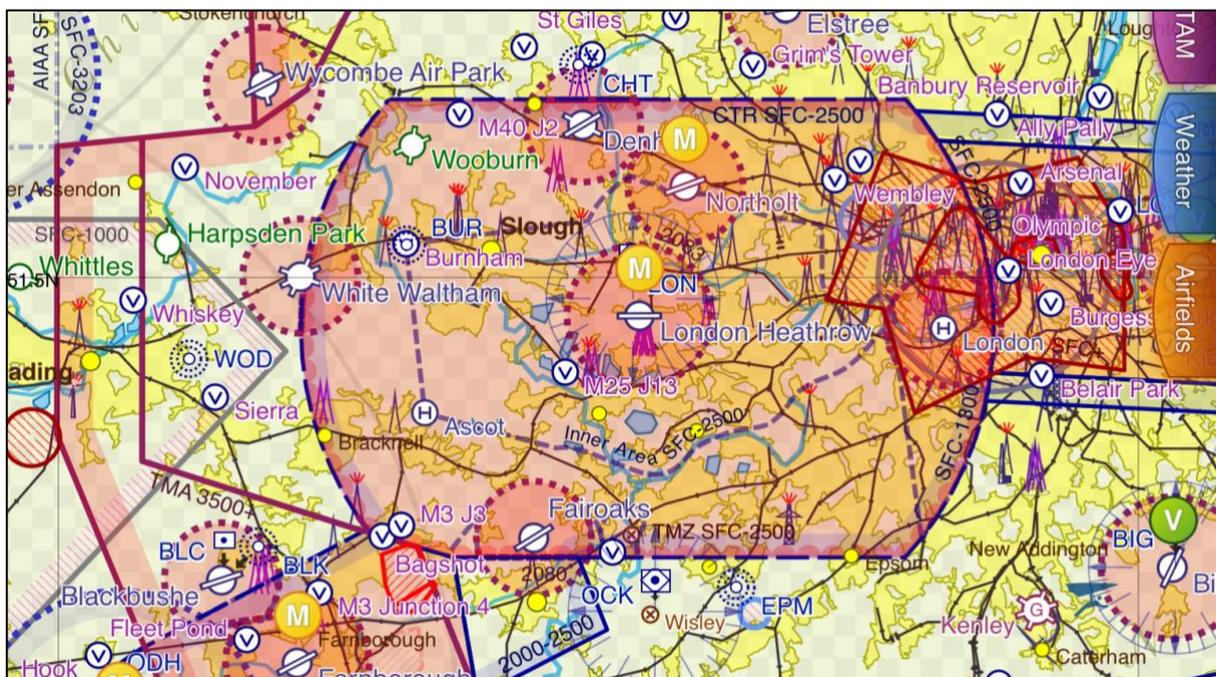
2019 Scheduled Traffic Movements Heathrow –	37,726
2019 Scheduled Traffic Movements Waterford –	0
2019 Scheduled Traffic Movements Sligo -	0

Yet both Sligo and Waterford have a higher classification of airspace than London Heathrow (Class C vs Class D), and both control zones are much bigger. Reclassifying regional airports' airspace to Class D has a number of benefits. It still provides controlled airspace protection for IFR traffic and the VFR Met requirements are the same. The regional airports are a non-radar environment and separation is provided on a procedural basis. This introduces a significant burden on VFR flight training traffic that would have to vacate the circuit or land

to facilitate an IFR arrival. Class D does not mandate separation between VFR and IFR traffic and would allow, for example, training aircraft to remain in the circuit and position behind (subject to wake etc.) the IFR arrival and continue their detail. Again, the distraction element and the associated burden on the Air Traffic Controller is reduced giving improved situation awareness, lower workload and an overall improved level of safety.



Sligo Control Zone with the dimensions of the London Heathrow Control Zone superimposed on it (Class C Airspace)



The London Heathrow Control Zone (Class D Airspace)

Inappropriate use of TMZ and RMZ

Mandating the use of Transponders and Radios in Waterford when the Class C CTR is not active prohibits the use of this airspace by VFR Traffic that are not equipped with the specified equipment. If the Class C airspace is not active, then separation for IFR traffic is not required and given the airport is non-radar, I can't understand the logic behind this requirement. It's worth pointing out that approximately 75% of single engine piston aircraft registered in Ireland fall into the Annex 1 category (Flight Permit). Many of these are historic aircraft and microlights that are not fitted with electrical systems powerful enough for transponders. They are also very expensive to purchase.

Activation of Military Airspace

The ability to contact MIL RADAR at low levels in the midlands is often restricted. Indeed even in areas such as Portarlington / Clonbullogue it can be difficult to raise Dublin or Military as high as 2,000ft. Is there a way for Military to use an electronic solution (e.g. Skydemon, Runway HD etc.) to notify pilots when the airspace is active?

Lowering of the Base of Controlled Airspace

During the recent online consultation by the ANSP, it was stated that comments were being invited for the airspace review and that no specific plans were being put forward (except for the Kerry CTA due to the runway redesignation later this year). At the recent GASCI meeting it was revealed that consideration is being given by the Regulator to lowering the base of uncontrolled airspace across the country to 4,500ft. This is completely at odds with the ANSP. With the exception of a few areas specified above, there is no reason why the base of controlled airspace needs to be lowered in the country.

The latest changes in pilot training place a heavy emphasis on the avoidance of loss of control. Indeed this is included as a Key Safety Area in the IAA's (Regulator) Annual Safety Performance Review. These training requirements rely on access to uncontrolled airspace at higher altitudes to conduct this training. The introduction of Point Merge onto runway 10 in Dublin lowered the base of controlled airspace in the Dublin CTA. This now requires aircraft from Weston to transit a significant distance to the west to climb to the altitude required for these exercises. Even then, a base of 4,500ft in the Dublin area does not leave much room to manoeuvre with due regard to the recommended recovery heights.

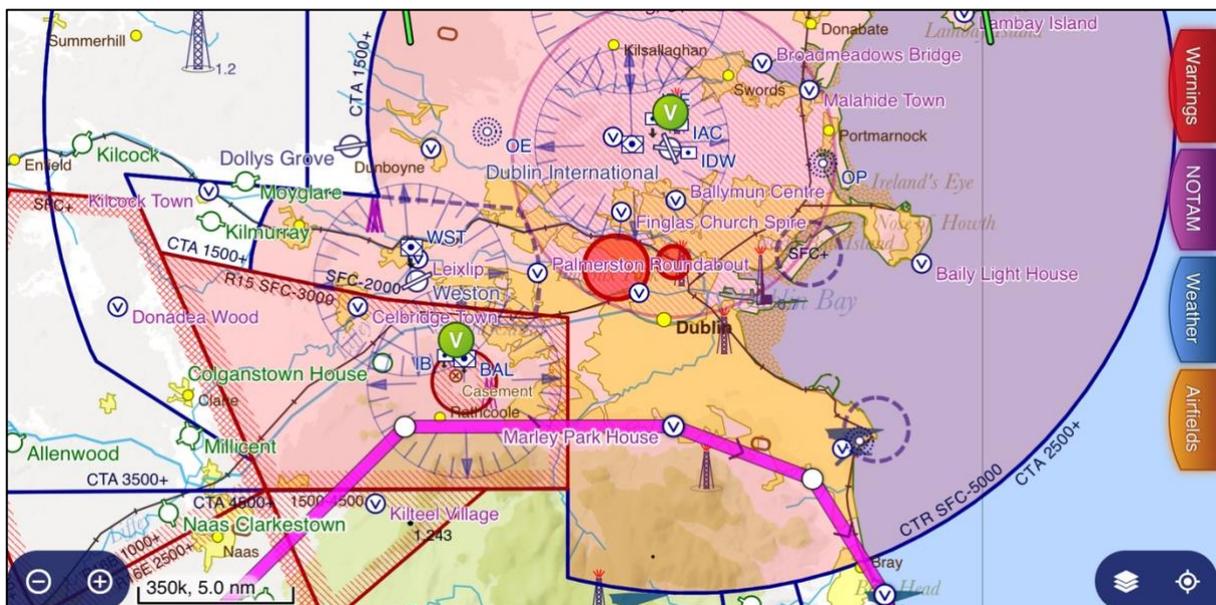
Again, highlighting the comments made during the online consultation by the ANSP, why would a controller in Dublin or Shannon need to know about a Cessna 152 conducting upper air work over the Shannon at FL60? Again this adds an unnecessary burden and distraction to the controller and the flight instructor / pilot.

Dublin Control Zone

The Dublin Control Zone south of the Liffey makes transiting between Weston and Newcastle a lot more difficult than it needs to be. As well as causing high workload for the pilot when climbing out of Weston trying to obtain a transit clearance before Palmerstown Roundabout, the "not above 1700ft" conditional clearance that is often given to pilots could make SERA.3105 difficult to comply with, in certain wind conditions when flying down the Liffey. The regulator may make the argument that a base of controlled airspace over south

Dublin of 1,500ft would not resolve this problem, and I agree. However, if the M50 route was to remain outside of CAS south of the Liffey, this would give pilots lots of options in the event of an engine failure or other in flight emergency. The final approach fix for runway 34 is located between Killiney and Dun Laoghaire at 3,000ft and so would permit VFR traffic outside controlled airspace below 2,000ft.

Dublin CTR transits are handled by the Dublin Tower controller. Having the controller deal with a microlight flying at 60 mph 16nm away to transit from Kilrush to Newcastle via the M50 does not seem sensible and exposes them, commercial aircraft PIC's and fare paying passengers to unnecessary distractions that could lead to a Runway Incursion (IAA Key Safety Area).



A routing such as this should be achievable outside of controlled airspace

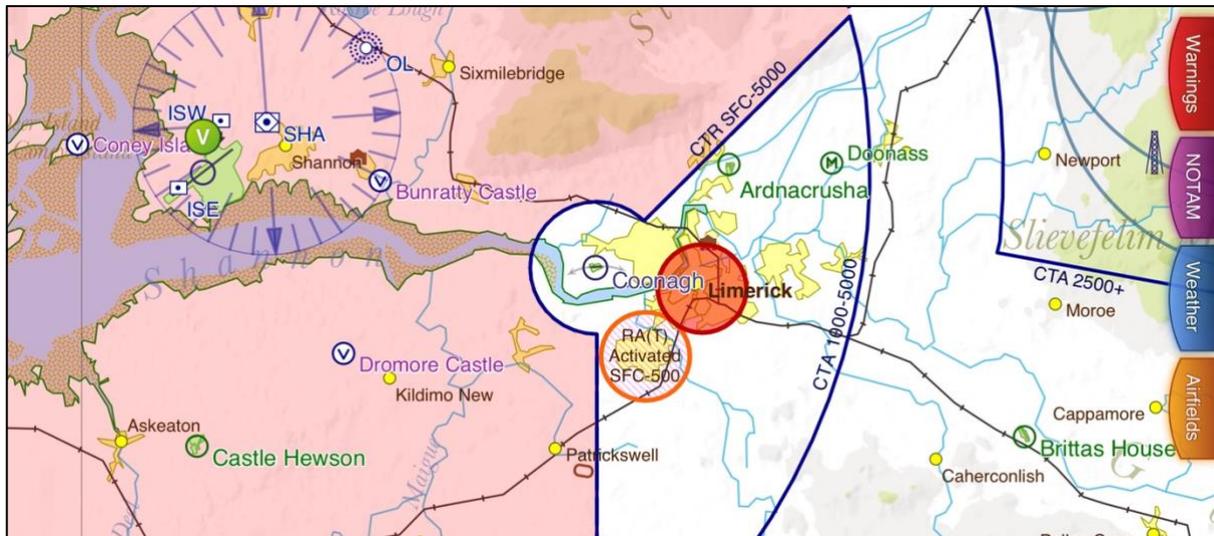
Romeo 15

I never understood why the change was made 10+ years ago for the R15 to revert to Dublin controlled Class C airspace when not active by the military. Some parts of this airspace are up to 16nm from the threshold of runway 10R in Dublin. If this airspace was to revert to Class G when not active, along with sensible changes to the Dublin CTR suggested above, this would permit a flight path for GA, clear of high terrain, to transit towards Newcastle and the east coast. At the moment, pilots flying to and from Newcastle towards the Midlands need to cross mountainous terrain if they do not have a radio or transponder. Again the regulator will say that it's up to the pilots to ensure they are operating over suitable terrain where they could make a forced landing if required. I agree, however, this is no excuse for poor airspace design in the Dublin area and again removes another layer of protection in the error chain leading to incidents and accidents.

Prohibited Airspace

EI-P8 and EI-P9 are established over Portlaoise and Limerick prisons respectively. Both are in close proximity to General Aviation aerodromes that include flight training activity. This airspace review might be a good time to address the requirements for such prohibited

airspace. In the case of EI-P9, it already creates a pinch point for traffic coming to and from Coonagh.



Poor airspace design around Coonagh exposes GA pilots to the risk of Mid-Air Collision (Key Safety Area) and Airspace Infringement (Safety Performance Indicator)

All of the prohibited airspace over prisons in Northern Ireland has been removed. In the case of Maghaberry, this was changed to Restricted Airspace (EGR431) and applies to helicopters only. A reduction in size and a change of applicability to helicopters only appears to be a sensible approach here.

[Comments by the IAA Representative \(Regulator\)](#)

I was disappointed and concerned by some of the comments that were made by a representative of the IAA at a recent GASCI meeting. Based on what I heard, it very much appeared to me that another 'airspace grab' was on the cards from the regulator. A position that seemed to be very much at odds with that of the ANSP. It was noted by the IAA representative (Regulator) that all of the comments received until that point (25th March) did not address airspace. Indeed, from the tone of the interjection it appeared that everything to date has simply been cast aside and any airspace changes are a 'fait accompli'.

It was also pointed out that if General Aviation pilots wanted changes made to airspace, they should submit an airspace change proposal as laid out in IAA ASAM 019. This throw away comment clearly highlighted the lack of understanding that some IAA staff have for general aviation in Ireland. This needs to change. Certain departments in the IAA (Airworthiness, FCL) have made great efforts over the last few years to engage and work with the general aviation community in Ireland.

[Airspace Change Proposal](#)

When researching this submission, it has become clear that airspace changes in Ireland are a very cloak and dagger affair. It appears they only come to the attention of pilots when completed, and the AIP and Charts are published. In the UK for example, all airspace change proposals are a very transparent process with comments invited from stakeholders at each step.

While I welcome the opportunity to make a submission on this Airspace Review, I think it would be beneficial for all future airspace change proposals to be open to public comment prior to a final decision being made.

If you would like to discuss any of the points I have raised above please do not hesitate to contact me at mark@flyinginireland.com