Response to Edinburgh Airspace Proposal

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1. General

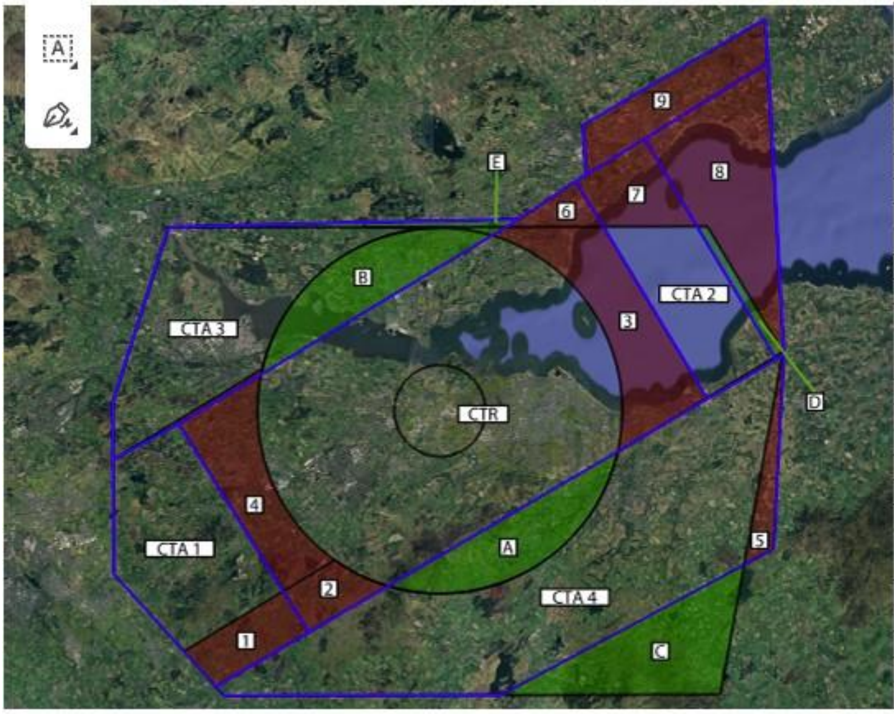
This document is a response to the Edinburgh Airspace Change Proposal. It is the product of a series of club and Strut meetings that have included many General Aviation users of this airspace as possible. The Scottish Aero Club, relevant Struts of the Light Aircraft Association, East of Scotland Microlights have all been involved. This document has been widely distributed to the GA community affected by the Edinburgh proposals. The Edinburgh response has involved Justin Kennedy, Chairman of the LAA East of Scotland Strut in conjunction with Keith Boardman representing the LAA Strathtay Strut and William Scott, Chairman of the Scottish Aeroclub. We are also directly associated with Ian Sweetland, LAA Director based in Scotland, who is also responding to the Glasgow proposals.

Our primary concern is the North/South VFR transit adjacent to the Edinburgh CTR and CTAs proposed changes below 7,000ft. The proposals have a detrimental effect on such transits and given the traffic density projections at Edinburgh it is hard to imagine that North/South zone transits would be more readily available.
The Edinburgh Proposals detrimentally affect the safety and availability of the alternative routes. Our points consider the CAA Policy for the Design of Controlled Airspace and conform to legislation on separation (VSM) In less favourable weather conditions, North of the central belt could be completely cut off from the South.
We expect you to be hearing from affected pilots

The concerns are threefold.

2. Eastern Boundary concerning area 7 & 8.
3. Low level river crossing in Area 3,4 & 6.
4. Boundary concerning CTA1 and CTA3.

The maps and diagrams throughout are taken from the Edinburgh Airspace Change Proposal and are referred to in the coming sections. The light aircraft Heat Map is provided by Tim Dawson OBE of Sky Demon.

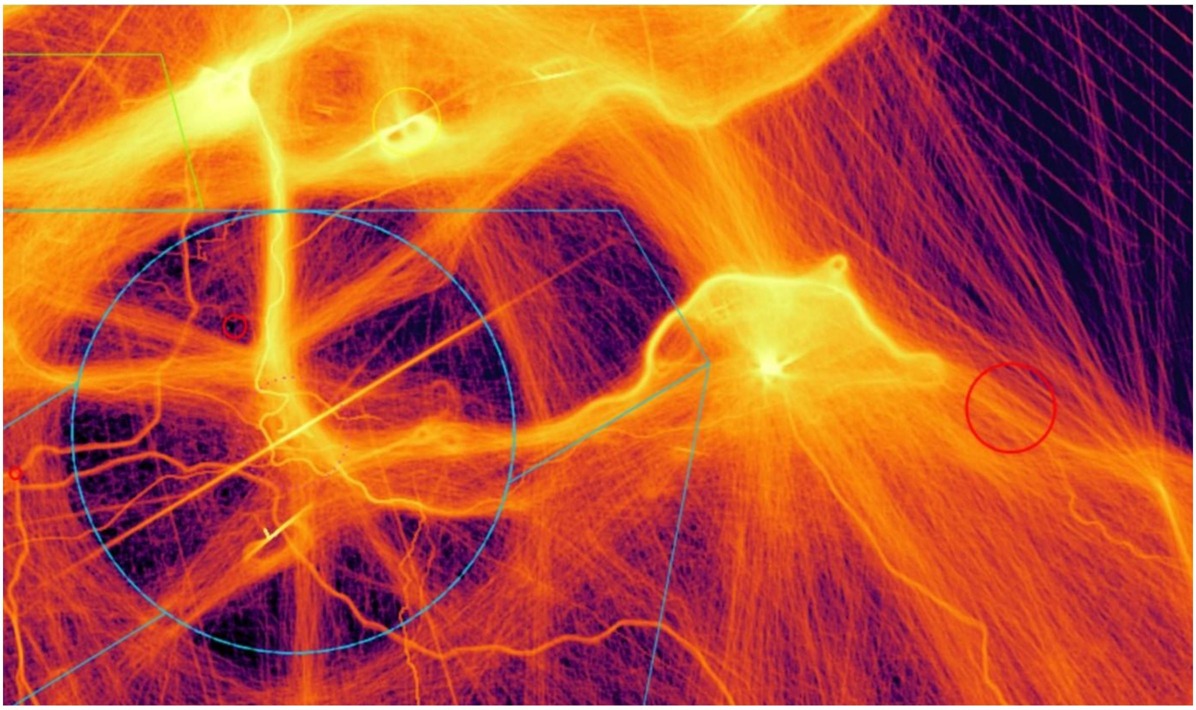


Label	New definitions	
Increased CAS (red polygons)		
Label	Lower limit	Upper limit
1	2,500ft	6,000ft
2	SFC	6,000ft
3	SFC	6,000ft
4	SFC	6,000ft
5	3,500ft	6,000ft
6	SFC	6,000ft
7	2,500ft	6,000ft
8	3,500ft	6,000ft
9	5,500ft	FL 75
Decreased CAS (greenpolygons)		
Label	Lower limit	Upper limit
A	3,500ft	6,000ft
B	3,500ft	6,000ft
C	5,500ft	FL 195
D	3,500ft	6,000ft
E	3,500ft	6,000ft
No changes (no shading)		
Label	Lower limit	Upper limit
CTR	SFC	6,000ft
CTA 1	2,500ft	6,000ft
CTA 2	2,500ft	6,000ft
CTA 3	3,500ft	6,000ft
CTA 4	3,500ft	6,000ft

Figure 46: Areas of difference between the current and proposed airspace for Edinburgh operations (comparing Figure 43 with Figure 44). (Base Map Source: Google Earth, UK AIP July 2024 and Nerl (kml file 15/07/2024).

This diagram shows only changes involving the Edinburgh CTR or CTA. Changes to TMA areas are covered in the NERL ACP. Positive changes are shown in green and denoted with a number. Negative changes are shown as red and denoted by a letter.

Proposed boundaries are shown in blue, and existing boundaries that differ are shown in black.



Produced by Tim Dawson OBE of Sky Demon. (2 years of SkyDemon flights to Nov 24)

1. Eastern Boundary area 7 & 8

We are concerned by the Edinburgh Proposal for the river crossing between Largo Bay and North Berwick just outside of the Eastern boundary of the current Edinburgh CAS. As can be seen from the Heat Map above, this is a heavily used route by GA especially for aircraft routing to and from Perth to Newcastle and the South. Eliminating the need for many zone transits through the TMA.

The Edinburgh proposal to create Area 8 with a base of 3500 ft reduces the safety and usability of our existing crossing.
Asking pilots who have been to our meetings, most say they make the crossing at 5,500 ft.

We therefore seek a 5500 ft Forth crossing, in or near this area, as necessary to avoid a serious reduction in the accessibility of a safe crossing for light aircraft in Class G Airspace.

In pursuit of this aim we obviously need to move our corridor to the East to allow the commercial aircraft descending onto the ILS for Runway 24 to have separation from our requested corridor with a 5,500 ft ceiling. The problem is that the most Northerly tip of Area 8 (marked by the cross hatched area) on the map on the next page has a 3500 ft base that cuts off our requested corridor.

We therefore suggest that our new corridor (marked in Green) move further East to run from Largo Bay to Earlsferry and then turn South direct to North Berwick.
This means that a light aircraft would be over land by following the coast until coasting out East of Earlsferry and tracking across the shortest crossing to North Berwick. This would only require a small change to Area 8 as shown on our map below.

The small change to the Edinburgh Proposal that we are requesting is that the part of Area 8 that is marked by cross hatching in black would be removed from Area 8 and be added to the Scottish TMA5 which will give it a base of the 5,500 ft that we need. Made possible by moving our route Eastward.
The base of both Area 7 & 8 ignore the law on separation (VSM) we think they should both be 500 ft higher than the Proposal sets them.

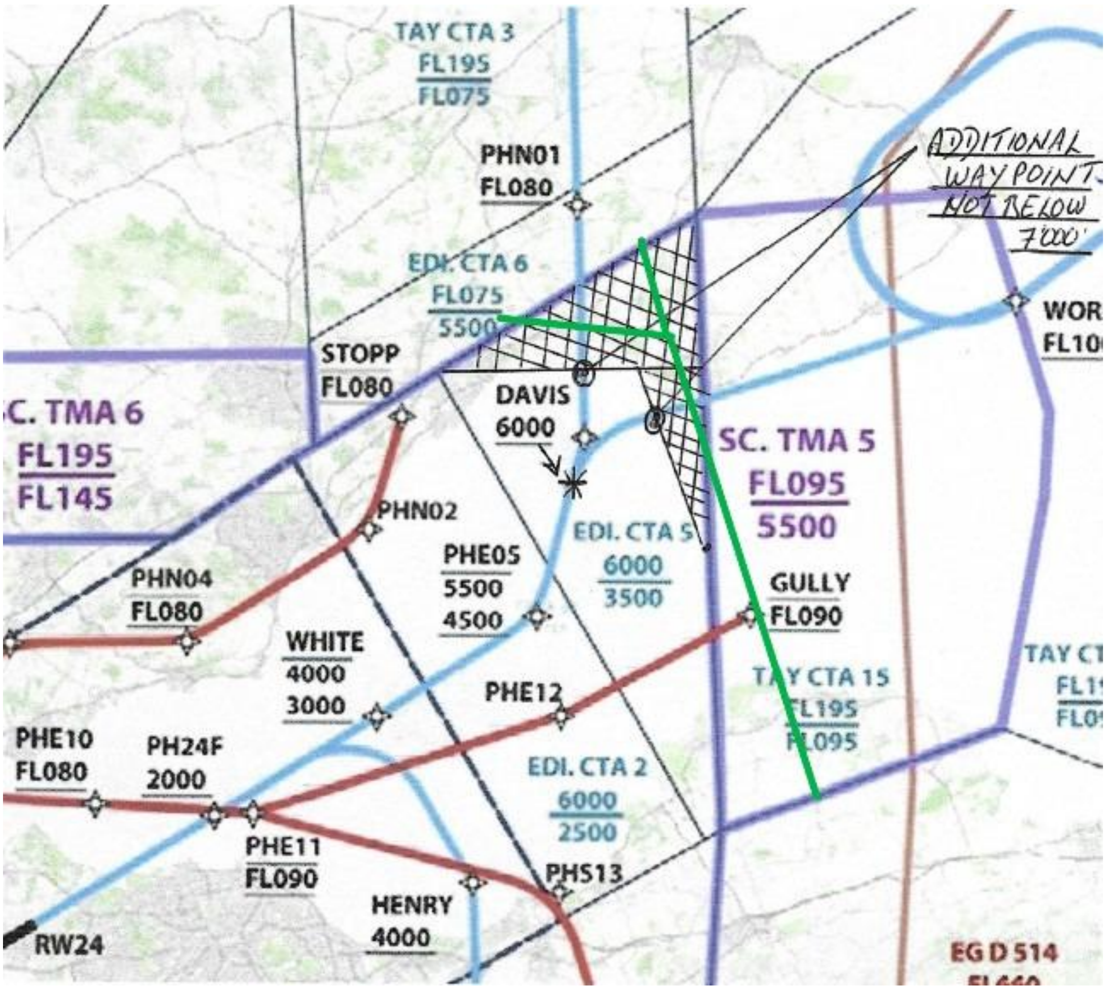


Chart from page 533 of the Full Operations Appraisal
attached to the Edinburgh Proposal

The route of the descent of inbound aircraft to the ILS Runway 24 shown on your map shows that the commercial aircraft will be at 6000 ft at point Davis and over 7,000 ft as they cross both the coast at Largo Bay and Earlsferry coastline thus giving a healthy 1,500 ft separation. They will not be on the ILS at this point. Our research shows that aircraft are usually well above this that far out.
The light aircraft using this the Class G airspace below the Scottish TMA5 would have the 5,500 ft they need all the way from Largo Bay to North Berwick in Class G airspace with a ceiling of 5,500 ft.

The route would be easily navigated accurately by VFR aircraft by staying over the land all the way from Largo Bay and coasting out just East of Earlsferry then routing to a very visible Bass Rock after the shortest crossing possible. This easily navigable VFR route would reduce infringements and increase safety by providing a shorter crossing to North Berwick. Light Aircraft would only have to fly an extra 5 miles or so. A satisfactory safe compromise which accommodates all airspace users.

We would suggest that these small changes to the Edinburgh Proposal for Area 8 provide a satisfactory solution to both commercial and light aircraft.

The base heights of both Area 7 & 8 ignore the law on separation (VSM) we think they should both be 500 ft higher than the Proposal sets them

3. Outbound commercial aircraft from Runway 06

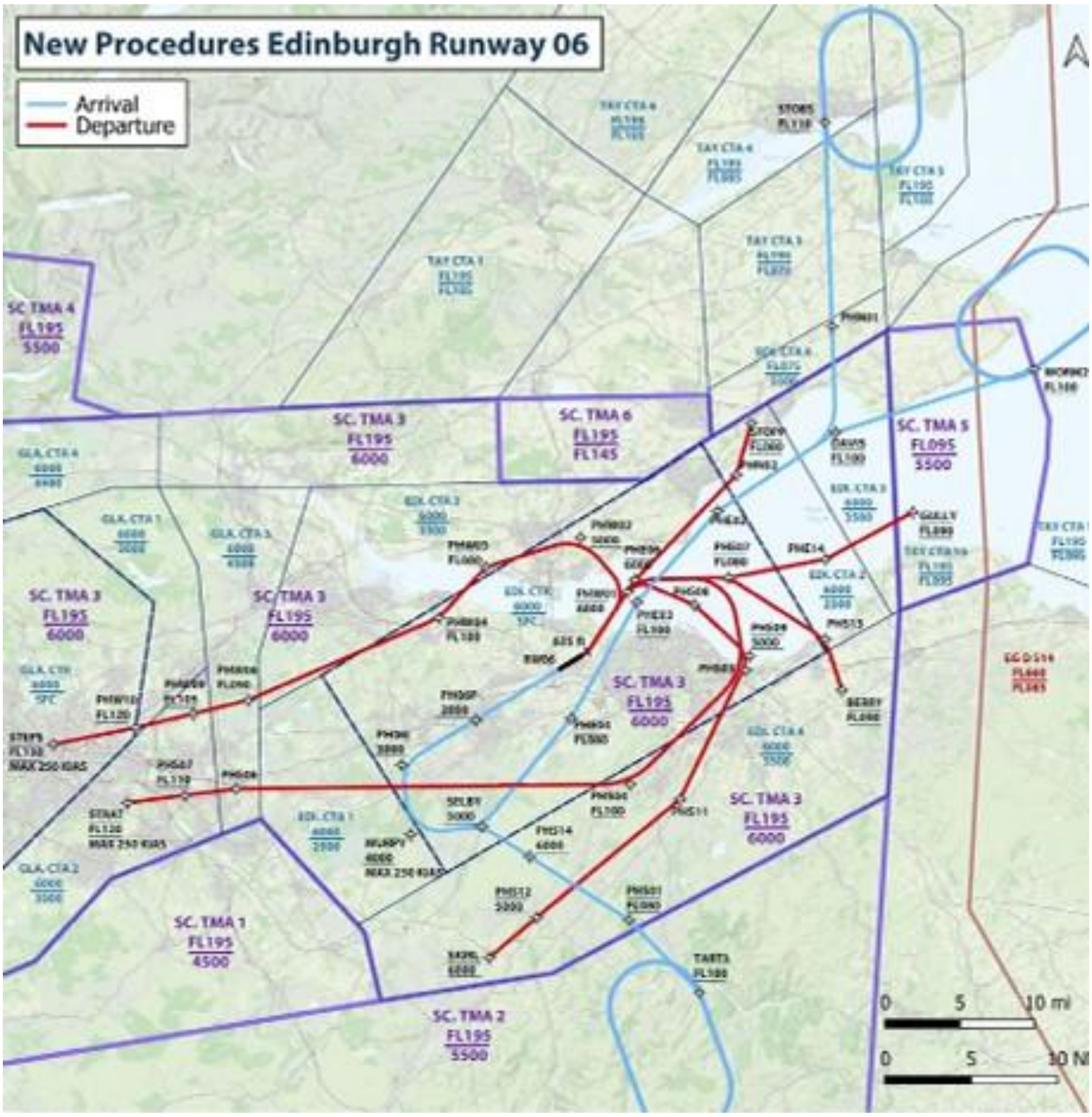
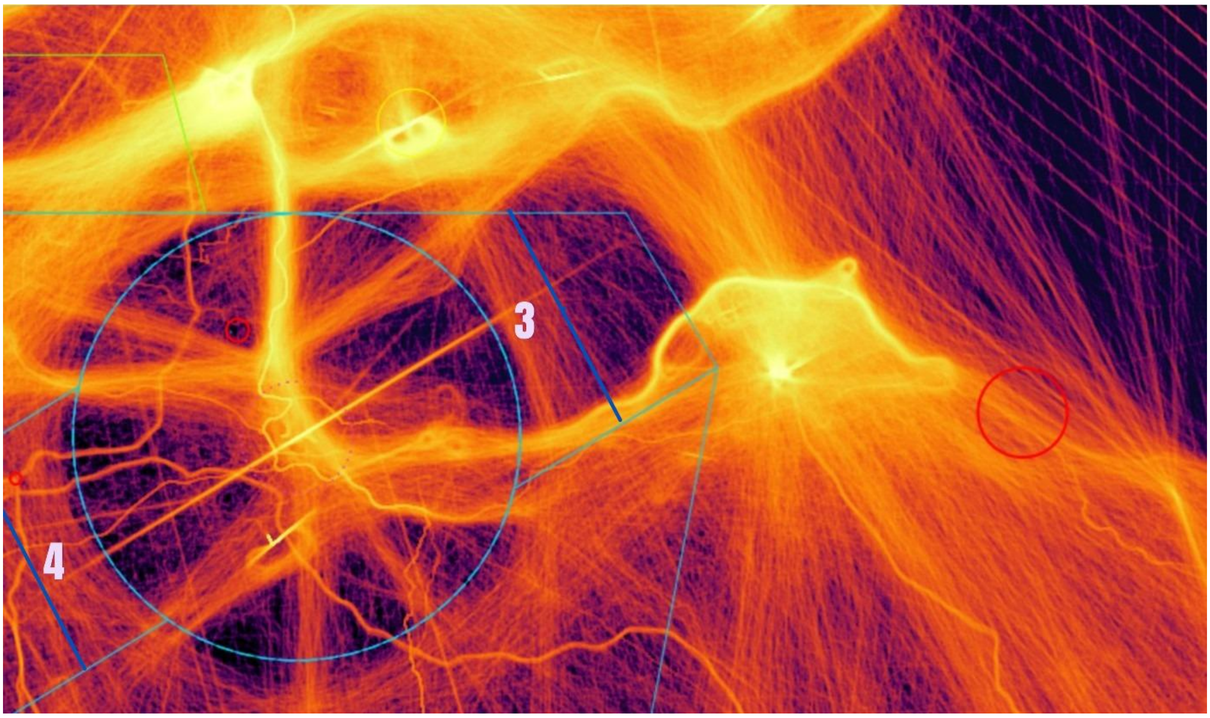


Chart from page 531 of the Full Operations appraisal

This picture above is taken from the Edinburgh Proposal shows the outbound route from Runway 06 (marked in Red). None of these routes will conflict with the ceiling of Area 8 let alone our suggested Class G corridor. In the worst case the outbound aircraft from Runway 06 to the West will be well over 10,000 ft as it goes over our suggested corridor. No conflict with commercial aircraft and our requested route outbound.

4. Areas 3,4 & 6 of the Edinburgh Changes Proposal

The airspace in Area 3,4 & 6 currently has a base of 2,500 ft and is now proposed to be down to the surface. For light aircraft this low level crossing area is a way to get round Edinburgh Airspace when other routes are unavailable. Its' usage is considerable as can be seen from our Heat Map of the Area below.



Produced by Tim Dawson OBE of Sky Demon. (shows 2 years to Nov 24)

The Edinburgh proposal changes this area from Class G to Surface to 6,000 ft. The Proposal is to close this airspace completely which would cut off another North/South lifeline to light aircraft and GA. This will be a significant restriction to VFR operations around the CTR and reduce the flexibility that general aviation pilots currently depend on. The current arrangement in Area 3 has worked satisfactorily for decades.
Currently Area 3 is Class G airspace and has had a base of 2,500 ft for years. The ILS for Runway 24 puts the aircraft on the ILS at 3,000 ft as they enter the existing CTR at 9.33 nm from touchdown which is only a 500 ft separation from Class G airspace below. Not a legal separation at all! However this anomaly does not detract from the fact that this airspace is valuable to light aircraft.

We are requesting the Area 3 base be set at 1500 ft. Inbound commercial aircraft, on the ILS, are at 3000 ft the on the CTR boundary. This gives a legal separation 1,500 ft. This airspace is not used by you in your proposals or otherwise and it is a short crossing over water that it is a safe VFR transit route. It is perhaps noting here that in the legal CAA document **Policy for the Design of Controlled Airspace. Annex A para 4.2** it states that "where at all possible" areas just outside the CTR, should be Class G with a ceiling of 1,500 ft. As in this case exactly like your proposed Areas 3,4 & 6.

5. Western Boundary concerning CTA1 and CTA3 (Cumbernauld Gap)

This area is known to have bad weather, some high ground and also gives rise to the majority of infringements in Central Scotland. The heat map of light aircraft traffic shows that this is not such a popular route. We would suggest increasing the ceiling to 4000 ft as it would then provide a safer North/South corridor when weather permits. The closest conflict would be the proposed approach route to Runway 06 which is shown as being East of Livingston. Thus, there is no conflict with the proposed inbound route to 06. Using the 3 degree glideslope principle would mean there is ample separation even when vectoring aircraft further West into Area CTA1 & CTA3. We would propose that the ceiling be set at 4000 ft. We can see no obvious conflict with the Edinburgh operations here.

6. Conclusion

We have shown that it would only require minimal changes to the Edinburgh Airspace Change proposals to avoid unnecessary restrictions on light aircraft and GA in general. Our aim is to decrease congestion, increase safety and reduce infringements.

All airspace designs should strive to accommodate all airspace users by law. Our requests are aimed at just that. We are all in pursuit of the coexistence of light aircraft and commercial aircraft in the most convenient way possible. The establishment of an appropriately high crossing of the Forth is very important to us.

As advised by Edinburgh we are circulating this paper among the light aircraft community in the expectation they will make their individual representations and comment on their reaction to this document to lend it weight.
We represent a major light aircraft contingent in this area and look forward to productive discussion leading to a refined design and attempts to accommodate the needs of all users of Edinburgh airspace.