

Feshiebridge Airfield  
Kincaig  
Inverness-shire  
Scotland  
Tel 01540 651317



12th April 2017

Please reply to:

[REDACTED]  
Manager Air Traffic Services  
Inverness Airport



Dear [REDACTED]

Your letter of 31<sup>st</sup> March to [REDACTED] has been passed to me, as I am the club's airspace rep. I will attempt to answer your questions and also to reiterate the issues we have with your proposal, that we have already set out in our consultation response.

Firstly, just to be clear on the times of our operation, although we are primarily a club operating at weekends and public holidays, we do have 7 day operations from time to time, and in fact increasingly so as more of our members are retired. For example we will be flying all week next week, and then a flying fortnight starting 29<sup>th</sup> April.

You are asking for some pretty specific data which we mostly don't have, so in many cases I can only answer in general terms.

*Average number of daily launches at weekend and bank holidays:* Looking at our data since 1999, the number of launches per day varies from zero to 54 depending massively on the weather. We conduct around 850 flights per year so an average figure, for what it is worth, would be around 8, but with a very large weather-dependant variation.

*Average daily number of transits across Inverness Airport:*

*Towed:* I can't recall us ever towing over Inverness Airport - it is some 30 miles from our site.

*Free flight:* Rarely, since Inverness Airport's location is not conducive to good thermal soaring. There has been the occasional flight in mountain wave at altitude above Inverness Airport but I don't have any specific records.

*Details of transit tracks...:* The only information we have, which is from the national database, has already been provided to you by Highland Gliding Club.

*Percentage of gliders at Feshie fitted with VHF radio:* I think all gliders at Feshie have VHF radio, however this is perhaps not the right question to ask since most pilots do

not hold an R/T licence and are thus only permitted by law to talk on the gliding frequencies. It is a criminal offence to talk to ATC without a licence (except in emergency). Our pilots do not hold RT licences because there is no requirement to, or need. At a guess perhaps 20% of our pilots hold RT licences, and most of those are uncomfortable talking to ATC.

*Percentage of non-radio equipped gliders that transit to the West....:* Firstly I am not sure what you mean by "transit to the west". Our club is roughly due South of Inverness airport and so part of our local soaring area is to the west of the airport. Depending on the conditions all, none, or somewhere in between, of our gliders can be flying to the west of Inverness Airport, as I mentioned only about 20% have an RT licence. Our members rarely fly directly over Inverness Airport.

On the subject of radios and RT can I explain to you that gliding requires far more concentration than power flying, for various reasons including the need to constantly be seeking lift, so the flight path in terms of heading and speed frequently has to be changed, the situation and mental model constantly re-evaluated. Glider pilots also tend to fly close to each other in areas of good lift, perhaps whilst circling in the same thermal at the same altitude, and so maintaining an exemplary lookout is vital. Having to select a radio frequency away from the gliding one of 130.100, engage brain before talking to ATC, deal with the response, negotiate etc is a major distraction that does have a significant effect both on soaring performance and more importantly, lookout and flight safety. I am a (retired) commercial helicopter pilot and even I, accustomed to talking to ATC all my working life, find it a major distraction when gliding, whilst it is an inconsequential issue when I am flying power.

*Main operating areas ....:*

*Number of days/year that areas to the W of Inverness airport are utilised:* Since our club is roughly due south of Inverness, we frequently operate to the West of the airport. I have no specific data but probably half or more the days we fly, conditions are conducive to flight to the west of Inverness. We fly perhaps 85 days per average year.

*Details of soaring tracks:* The only information we have has already been passed to you by Highland Gliding Club, but as a general point most of our flights are within the area of the Spey Valley as far north as the Findhorn valley, as far west as the eastern end of Loch Laggan. But of course on good days, we can roam much further afield.

*Best months for operations W of Inverness Airport:* I don't think we can say that there are any particularly favourable months. When soaring is by means thermal, April to September are the best months. But when by mountain wave, this can occur at any time of the year and perhaps is more prevalent over the winter half of the year ie September to April.

*What particular weather systems influence flight to the W of Inverness:* For thermal soaring, a ridge of high pressure or a col can be particularly good, however thermals can occur any time it isn't raining and there is some sun reaching the ground. Wave soaring tends to be best with a slightly anticyclonic flow eg at the periphery of a high pressure system, but can occur locally in a fairly unpredictable way any time there is wind and medium to high pressure with fairly straight isobars. The area to the W of



Inverness being in the middle of the country, means that wave can be found there in pretty much any wind direction except perhaps NE.

To reiterate our issues with your proposal, firstly the consultation presented no evidence as to why a change of airspace was required. The gliding club has been extant for 50 years now and whilst we have seen CAT into Inverness increase in that time, there has been no significant increase (and in fact possibly a decrease) in the last 10 years or so. There have been no Airproxes with our gliders on CAT for very many years (one in the entire 50 year history). Military flying at low level in the area has reduced with the departure of the Tornados. In summary, there is no justification for your proposal on the grounds of a change of circumstance. It seems from the consultation document that you want to have a large area of controlled airspace just for the sake of it.

In our opinion, a modest area of CAS around the airport, perhaps 5 miles radius with stubs along the instrument approach paths, would be reasonable. Bearing in mind the nature of the traffic and your radar equipment, this only needs to be Class E+. There is absolutely no justification for the massive swathe of Class D and E+ that you are proposing, it is completely disproportionate to your needs and you have not provided any competent justification for having it – because, in our opinion, there is none.

You are proposing Class E+ that goes some 30 miles from your airport and yet less than 4 miles from our site. Since most of our gliders do not have transponders this means radio contact with and permission from ATC in order to enter the airspace – it effectively becomes nearly as onerous to a glider pilot as Class D.

I remain sceptical that a typical glider radio (5 watts or so) can maintain effective two way comms with a ground station some 30 miles away, with the intervening terrain. Glider pilots often tend to fly in groups where the lift is good, but you haven't considered what will happen when 10 pilots are all trying to contact ATC at the same time as they are circling close to each other in a thermal or climbing in wave into Class E+, with marginal or inadequate comms. It will also be a major disruption to any comms with your CAT flights and just cause everyone a lot of stress, distraction and thus loss of safety, for no gain.

The base of the proposed airspace at 6000' amsl is only 5000' above our site and only 3000' above the terrain in some areas. We routinely operate above this altitude in these areas when the weather is accommodating. Class E+ requires glider pilots to maintain VMC which, above 3000' amsl includes remaining 1000' vertically and 1500m clear of cloud. In Class G, glider pilots routinely fly closer to cloud than this, climbing up to cloudbase in a thermal or climbing past lenticular clouds just a few hundred metres away in wave. Such activity would become illegal in Class E+. By contrast, the current E+ in N560 is sufficiently high that it does not normally present this problem since one is normally well above cloud before reaching the base of the airspace.


The current procedures for allowing non-transponding aircraft into E+ are not well documented but it seems that ATC can if they wish, deny entry based on other traffic. Now that IN 2014-183 has time expired and no longer on the CAA website, I can find no reference to entry of non-transponder equipped aircraft into TMZs (which of course includes E+) in the UK AIP or AICs. I am thus worried that we don't have



strong grounds to gain non-transponder access to E+ if someone decides to challenge the point. We have found with N560 that there is a lot of variation between controllers, some cope well with gliders, others regard them as a pest and deny entry as a first reaction. Nearly all controllers feel the need to provide standard separation for IFR traffic from VFR even though this is not required and is gross over-controlling. So glider pilots entering Class E+ without a transponder are a hostage to fortune as to whom they speak to.

So in summary, lack of RT licences, difficulty and distraction of talking to ATC whilst soaring, difficult comms, RT congestion, impossibility of maintaining VMC, ease with which ATC can refuse entry on a whim, and questionable basis for such entry, will all conspire to make Class E+ at this sort of altitude a no-go area for most of glider pilots both visiting and local, and, being so close to our site, will thus have a devastating effect on our operations and success as one of the best soaring sites in the UK if not Europe. And it would all be for no valid reason. This is why Cairngorm Gliding Club remains opposed to your proposal.

Finally, can I point you in the direction of the FLARM network? We have a very high proportion of gliders fitted with FLARM (I can think of only one that isn't) and a ground receiving stations at our club, near Inverness, and at Highland Gliding Club. I totally understand that FLARM doesn't have the same integrity or reliability as SSR, however flight safety is all about probabilities, not binaries. If ATC had a web browser screen showing gliders in the vicinity of the approaches to Inverness, this would capture 90% or more of the gliders, 99% of the time and show their position and altitude. In terms of flight safety margin improvement, this would have nearly the same safety benefit as introducing E+ but with zero impact on our operations and at minimal cost to you. I commend you to consider it.

I do feel that perhaps you don't well understand the nature of gliding operations and I offer you an open invitation to call in at Feshiebridge for a flight any weekend, weather permitting. If I am around I will take you up in my own 2-seater glider, the one that last year went up to FL285 and (on a different flight) went to Skye and back. My contact details are 

Kind Regards

