



Comments on AIC 002/2021 - IAA Airspace Review 2021

To: airspace@iaa.ie

From: The Irish Light Aviation Society (ILAS)

About ILAS

Apart from its delegated role in airworthiness oversight for Annex I and amateur-built aircraft, the Irish Light Aviation Society (ILAS) has a membership of upwards of 300 people drawn from all aspects of aviation. Around half of these have pilot licences, ranging from LAPLs, through PPLs, CPLs and ATPLs. ILAS members operate in excess of 100 aircraft covering a wide variety of aircraft types ranging from fixed-wing classic and vintage, through factory-built gyrocopters, to high-performance kit-built aircraft and super-high-performance aerobatic aircraft. ILAS is a member of EFLEVA, the European Federation of Light, Experimental and Vintage Aircraft, and through it coordinates bilateral and multilateral relationships and activities in these aspects of General Aviation across Europe. ILAS operates an airfield in Wexford (EILF) to support the activities of its members, and regularly cooperates with and supports activities at other airfields around the country.

Among the objectives of ILAS are

- To provide leadership in the achievement of low cost flying through co-operation and partnership with like-minded bodies, and appropriate representation at all levels;
- To promote safety in all aspects of the Society's activities.

As ILAS does not represent one particular type of activity or one particular geographic location in the country, its submission on airspace change proposals will by necessity be fairly general, though a number of specific points that directly affect ILAS members are also mentioned below. The points made here should complement those of particular ILAS members or of other organisations that have similar or more specific needs.

ILAS inputs to the Airspace Review process

ILAS acknowledges the following points from the online briefing sessions held in early March and would request that these **generic principles** be maintained throughout the airspace change process:

- That only airspace that needs to be controlled would be designated as controlled airspace;
- That airspace that does not need to be controlled (both in location *and in time*) would be designated as Class G, making as much airspace available to GA activities as possible.

In addition, ILAS expects that any/all specific changes proposed to existing airspace going forward would be **subject to notification as per established ACN procedure**, as clearly we would need to evaluate the positive and negative impact of specific change proposals made.

In terms of airspace redesign proposals, ILAS wishes that the following **general considerations** be taken into account in both short and medium-term airspace change planning:

- That airspace changes necessary to facilitate continuous descent operations (CDOs) would be limited to the specific geographic locations where these are necessary and would not simply be added as a 'halo' of sub-FL075 airspace around existing regional airport airspace;

- That the control zones and control areas around all Irish public airports be properly designed to facilitate their runways, the associated PBN approaches and the most common traffic directions, and not simply be large circles surrounding the airport;
- That areas of Class G airspace up to FL95 or FL100 would be available for special purposes such as parachuting, aerobatic training and upset training, and that in general all opportunities to **raise the upper level of Class G airspace** up from FL75 be availed of – consistent with the principle that only airspace that needs to be controlled would be designated as controlled airspace;
- That the use of Class D and Class E airspace to achieve the objectives sought for IFR and VFR traffic would be seriously considered.

In addition, ILAS wishes that the following **specific points** be considered for early resolution:

- That the Dublin CTR be rationalized to serve the real needs of Dublin airport's soon-to-be-three runways, and not simply cover almost the entire city;
- That a low-level uncontrolled VFR route be provided north of the Dublin mountains to allow safe east-west/west-east VFR transits between EINC and the rest of the country;
- That when EIR15 is not active, the associated CTR airspace would revert to Class G;
- That the 'pinch-point' of Class-G airspace over relatively high ground between the Connaught CTR and the Sligo CTR would be alleviated.
- Then when an airport such as Waterford is operating, but *not being used for commercial traffic*, that the rectangular stub airspace specifically designed to accommodate commercial traffic would revert to Class G. (This is because Waterford CTZ and CTA stubs can restrict VFR access to ILAS Field from the Midlands, West and South West, particularly as EIWF airspace is also a Transponder Mandatory Zone). The AIP is not clear on the status of these stubs when the CTR is active, or when the CTR is not active but AFIS is being provided, and the stubs may even be Class C active when neither the CTR nor AFIS are active, which makes no apparent sense;
- That a larger Class-G airspace buffer would be provided around Coonagh airfield (EICN);
- That the airspace surrounding Cork Airport be revised in light of Cork's actual runway needs, and in light of the known weather-related issues that arise from the relatively high elevation of the airport compared to the surrounding area.

ILAS is happy to support the use of 'listening squawks', and increased adoption of electronic conspicuity (EC) measures such as ADS-B, noting however, that some classic and vintage aircraft have no engine-powered electrical system and so there are particular challenges in supporting equipment that has a high RF output such as transponders.

Signed: _____

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On behalf of the Committee and Membership of ILAS