

10 Mar 18

INFORMATION FOR PILOTS AND OWNERS - BRIZE NORTON AND OXFORD AIRPORT AIRSPACE CHANGE PROPOSAL CONSULTATIONS

Introduction

RAF Brize Norton and London Oxford Airport (LOA), both situated in central southern England and in close proximity to each other, have proposed airspace changes around both airfields that are linked but presented in two separate consultations.

The consultancy that is working for Brize Norton and LOA has indicated that their job is to develop procedures and airspace for their clients, and the role of the CAA is to consider the impact on others.

On receipt of comments, airspace change proposers are required to summarise feedback and send this to the CAA. The BGA has seen summaries which try to portray numbers of objections as being small even when some responses are on behalf of organisations that represent tens of thousands of members. To avoid such misrepresentation, it is really important that Brize Norton and Oxford receive a significant number of responses from opponents to the proposals.

There is a team of people from across the GA Alliance membership who are collating and analysing data to inform a significantly detailed response to both consultations. That response will not be completed until the end of March. **Meanwhile, pilots and clubs are urged to individually respond to both consultations.**

There is a pressing need to ensure that the airspace change proposers and the CAA are very clear about the significant increase in risk and other issues presented by these disproportionate airspace change proposals. **ALL pilots are urged to respond to both consultations.**

The closing date for both consultations is 5th April 2018.

The consultation documents

The consultation documents are available on the CAA website at;

Brize Norton -

https://www.caa.co.uk/uploadedFiles/CAA/Content/Standard_Content/Commercial_industry/Airspace/Airspace_change/20171215_BZN_ACP.pdf

Oxford –

https://www.caa.co.uk/uploadedFiles/CAA/Content/Standard_Content/Commercial_industry/Airspace/Airspace_change/20171215_LOA_ACP.pdf

Brize Norton and Oxford airport have also published their consultation document on their website.

Advice - submitting your responses

Please:

1. Read the consultation documents.
2. Read the additional supplied information in this document
3. Consider the issues that concern you. Responding in detail on a few issues that you feel strongly about is much more useful than simply listing all the issues raised below.
4. Write response emails for both consultations.

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- Head your email as appropriate, eg “RAF Brize Norton Consultation Response” or “LOA Consultation Response”
 - If you object to the proposals, please make that clear, eg ‘I object to the proposed airspace changes because ...’
5. Before 5th April 2018, send individual email responses to;

Brize Norton – rafbrizenortonconsultation@ospreycl.co.uk

and

Oxford – londonoxfordairportconsultation@ospreycl.co.uk

You can copy your emails to the CAA - airspace.policy@caa.co.uk

Information

The following information includes general and specific points that aims to supplement the available published detail. Please do not cut and paste this information into your response – it’s important to use your own words and focus on the issues that concern you.

General points related to both the Brize Norton and London Oxford Airport (LOA) airspace change proposals

- The BGA has no objection in principle to the application of controlled airspace in situations where a rational assessment of public risk leads to the proposal of controlled airspace as part of a logical and proportionate solution. However, neither Brize Norton nor London Oxford airport (LOA) meet those criteria.
- The sky over the UK is a valuable but limited national asset. The proposed airspace changes directly benefit a small number of individuals who wish to take control of a scarce public asset for their exclusive use and exclusive gain.
- Brize Norton and LOA have engaged consultants to develop their airspace changes. Consultants provide solutions that meet the client’s needs. Selective use of information and presentation are all part of the process.
- There has been no meaningful stakeholder engagement with the gliding and wider GA community.
- Both consultations refer to stakeholder engagement with local operators prior to the publication of the formal consultation document. In previous years, Brize Norton had discussed an initial airspace design with two gliding clubs. Oxford previously consulted on an RMZ.
- Following repeated requests from the BGA, a meeting took place with the airspace change proposers during late summer 2017, during which the combined airspace changes were presented as final designs.
- These two sets of airspace change proposals are being developed under the CAA’s CAP725 process. It is well-known that the CAA’s CAP725 airspace change process being used for the Brize Norton and LOA consultations is flawed. Indeed, the CAA has recognised that the CAP725 process is not fit for purpose and on 1 Jan 18 implemented a revised CAA CAP1616 airspace change process.
- The quality of the Brize Norton and LOA consultation documents suggest a rush to meet the 1 Jan 18 deadline for continuing with the discredited CAP725 process.

- The CAA's advice to GA pilots is to plan on the assumption that they will not get access to controlled airspace.
- A QinetiQ study has identified that the majority of GA pilots choose to fly around controlled airspace.
- To all intents and purposes, gliding and much of GA is excluded from controlled airspace and cannot continue to operate within ever reducing areas of remaining uncontrolled airspace.
- All airspace users are concerned about the mid-air collision risk that result from funnelling of traffic between areas of controlled airspace, as well as between controlled airspace and the ground, known as 'choke points'.
- These two sets of proposed airspace changes generate new choke points and exacerbate existing choke points.
- The proposed class D airspace will mean that East/west and north/south transit across Berks, Bucks, Oxfordshire, and Wiltshire will be highly restricted.
- Gliding clubs are self-funded, not-for-profit entities and are dependent on being able to meet their member's needs including cross country gliding.
- It is highly likely that a significant number of air sport clubs, GA airfields and operating sites will be fatally damaged by the inevitable reduction in activity caused by restricted operations as a direct result of the proposed class D airspace.
- Inward-looking airspace developments do not contribute to overall airspace system safety.

Specific points – Brize Norton

General

- Brize Norton has proposed that it should establish a huge area of class D controlled airspace that significantly increases its existing class D controlled airspace.
- Brize Norton operates a small and mixed air transport fleet of heavy aircraft. A GA flying club also operates from the airfield adding to a relatively small number of total annual movements.
- Military fleet developments will result in less aircraft operating from Brize Norton in the future.
- The Military Aviation Authority places significant personal liability for risk management on individual managers, including those deemed responsible at Brize Norton
- The Military Aviation Authority has identified an unquantified risk caused by a gap in regulated airspace between the airways system and the existing Brize Norton CTR. In addition, Brize Norton is concerned that its aircraft occasionally fly outside the CTR during NDB, TACAN and ILS procedures.
- An RAF Standards Evaluation Team has decided that some Brize Norton aircraft should practice flying longer approaches.
- Brize Norton uniquely uses aircraft to practice procedures that the airlines practice in simulators, with the all the environmental, cost and scenario benefits that simulators provide.
- The sky over the UK is a valuable and limited national asset. The Brize Norton proposed airspace change directly benefits a small number of operators who wish to take control of a scarce public asset for their exclusive use.
- Conflict between Brize Norton and LOA aircraft to the south of LOA and east of Brize Norton is identified as an issue. The consultation overlooks the need for a collaborative ATC

environment where controllers for both sites are collocated with access to modern, fit for purpose equipment. It is unacceptable to load the impact of change onto those operating outside the proposed disproportionate controlled airspace rather mitigating issues through investing significantly in fit for purpose controller resources and process.

Safety

- It is abundantly clear that the Brize Norton airspace change proposers have not adequately considered overall airspace safety.
- A 'solution' has been produced in advance of understanding the needs of others and takes inadequate account of the effects of their proposals on those in surrounding class G airspace.
- The resulting self-serving proposals endanger the majority of airspace users who operate around the outside of the proposed class D airspace.
- On good flying days there are some very busy areas in the south of England. Choke points do matter. These proposals will significantly increase the density of traffic and therefore increase risk in existing choke points, will generate new choke points, and will result in increased traffic close to or overhead a number of gliding and other GA airfields, RAF Benson and Gloucester airports westerly approach.
- 'Veils' of class D airspace around Brize Norton will force aircraft lower to the ground, increase traffic density and will increase the risk of field landings by gliders and other soaring aircraft.
- Brize Norton claims that their proposed airspace will provide protection to IFR airspace users in the area. If the proposed class D airspace is approved by the CAA;
 - the risk to the majority of airspace users, ie VFR operators, operating outside the new class D airspace will be significantly increased
 - a number of new choke points will appear and the existing choke point east and south west of Brize Norton will be significantly worsened, which will increase the airprox and collision risk to those operating outside the proposed airspace
 - a large number of air sport clubs and GA airfields and operating sites will suffer a reduction in activity as a result of the proposed class D airspace. It is likely that some will become unviable and cease operation.
 - transit by gliders and other GA aircraft east/west and north/south across the centre of the central south of England will be highly restricted with no justification
- This proposal results in significant safety issues for gliding and other transiting traffic that Brize Norton has not considered within its proposals.
- The safety case for the proposed airspace change around LOA is based on subjective analysis of airprox reports. These reports are not analysed in the consultation document.
 - Very few of the airprox would have been changed by enlarging the airspace
 - Many are caused by to ATC error
 - Most Airprox in the vicinity of Brize Norton are not associated with Brize Norton traffic
 - Many are simply sighting reports and are not risk bearing. There are examples that are categorised as 'normal safety standards pertained'.
- Pilot interpreted and non-precision approaches result in excursions from the existing controlled airspace. Circuits are frequently flown at speeds which result in wider turns than necessary thus on occasions the aircraft fly outside the existing controlled airspace.

- The UK Airprox Board has opined that the procedures frequently flown at Brize Norton and result in excursions from existing controlled airspace could be practiced in simulators.
- Inward-looking airspace developments do not contribute to overall airspace system safety.

Proportionality

- The procedures and associated class D airspace have been designed without meaningful engagement with GA stakeholders.
- Brize Norton occasionally flies aircraft carrying military passengers. On average, a handful of flights per day that connect with airways. That there are so few flights and that many of them are at night is not revealed by the consultation document.
- The proposed additional large area of controlled airspace is not proportionate to the need.
- Brize Norton has chosen to ignore the option of utilising a Radio Mandatory Zone which would enhance a known environment with least disruption to other airspace users.
- An alternative design that connects to L9 airway and maintains a reasonable level of risk for other airspace users is achievable without adopting the proposed airspace design.

Damage to others

- Gliding local and cross-country flights are frequently flown in the area covered by the proposed airspace design. If the class D airspace is implemented, it would force such aircraft to fly around the controlled airspace resulting in a reduction in safety, as described above.
- This proposal effectively cuts off much off the central south of England to a large majority of GA and is damaging to both to private owners of aircraft and their clubs.
- By forcing aircraft to fly around the proposed controlled airspace, in addition to reducing safety, their operations will be unreasonably limited and there will be environmental impacts, including noise concentration and fuel burn.
- Airfields and clubs impacted by the proposed controlled airspace that are reliant on income from pilots who fly locally and cross-country but will be unable to continue to do so will suffer significant financial loss leading to economic hardship and in some cases closure.

Specific points – London Oxford Airport (LOA)

General

- LOA has proposed that it should establish a large area of class D controlled airspace to replace class G airspace both around its airfield and further afield.
- LOA, which operates GA training and GA business jets, has no commercial air transport activity.
- The airport owners (<http://www.reubenbrothers.com/london-oxford-airport/>) appear keen to expand the site.
- The local press has reported plans to extend the runway.
- The sky over the UK is a valuable and limited national asset. The LOA proposed airspace changes directly benefit a small number of rich individuals who wish to take control of a scarce public asset for their exclusive use and exclusive commercial gain.

Safety

- It is abundantly clear that the Oxford airport airspace change proposers have not adequately considered overall airspace safety.

- A 'solution' has been produced in advance of understanding the needs of others, and without taking account of the effects of their proposals on those in surrounding class G airspace.
- The resulting self-serving proposals increase risk to the majority of airspace users who operate around the outside of the proposed class D airspace.
- On good flying days there are some very busy areas in the south of England. Choke points do matter. These proposals will significantly increase the density of traffic and therefore increase risk in existing choke points, will generate new choke points, and will result in increased traffic close to or overhead a number of gliding and other GA airfields and RAF Benson.
- Inward-looking airspace developments do not contribute to overall airspace system safety.
- LOA claims that the current operation is tolerably safe. It claims that LOA needs the proposed controlled airspace as it has decided the airport needs a 'known traffic environment' to ensure that risk is as 'low as reasonably possible'.
- As briefed by LOA, the safety case for the proposed airspace change around LOA is based on subjective air traffic controller assessment based on what they see on their radar screen' and, as reported in the consultation document, airprox report 2014065. The airprox report makes interesting reading as it underlines cultural and systemic issues, including unusually large circuits that contributed to a non-risk bearing airprox caused by an Oxford aircraft that failed to take sufficient avoiding action having seen another aircraft.
- The class D controlled airspace proposed by Oxford airport is unnecessary and disproportionate. If the proposed class D airspace is approved by the CAA;
 - the risk to the majority of airspace users operating around the outside of the class D airspace will be significantly increased
 - a number of new choke points will appear and the existing choke point east of Oxford will be significantly worsened, which will increase the airprox and collision risk to those operating outside the proposed airspace
 - This proposal results in significant safety issues for gliding and other transiting traffic that Oxford has not considered within its proposal

Proportionality

- The area of class D airspace proposed by LOA is based on new procedures developed for LOA. Procedure designers follow the proposers brief.
- The procedures and associated class D airspace have been designed without meaningful engagement with GA stakeholders.
- There is no safety case to justify the proposed class D airspace. The existing ATZ and associated mitigations are, as described by LOA, tolerably safe.
- Implementing a large area of controlled airspace is not proportionate to any real need.
- LOA has no commercial air transport activity. There is no justification for class D airspace.
- The controlled airspace is likely to add significant commercial value to the LOA site.
- LOA has stated that their principal aim is to create a known environment and yet have chosen to ignore the option of using a Radio Mandatory Zone which would achieve exactly that with least disruption to other airspace users. Instead, the ACP seeks the right for LOA to control the airspace.
- For LOA, this is about the site's future development aspirations.

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Damaging to others

- Gliding local and cross-country flights are frequently flown in the area covered by the proposed airspace design. If the class D airspace is implemented, it will force such aircraft to fly around the controlled airspace resulting in the reduction in safety described above.
- This proposal effectively cuts off much of the central south of England to a large majority of GA and is damaging both to private owners of aircraft and their clubs.
- Aircraft will choose or will be forced to fly around the proposed CAS. Their safety will be reduced and their airborne movements will be unreasonably limited and restricted.
- Airfields and clubs impacted by the proposed controlled airspace that are reliant on income from pilots who fly locally and cross-country but will be unable to continue to do so will suffer significant financial loss leading to economic hardship and in some cases closure.
- Gliding operations at Weston-on-the-Green, Bicester, Enstone and Hinton will be directly and severely impacted by the LOA proposals. All other gliding clubs in southern England will be also be impacted because the proposed airspace changes will affect all cross-country pilots who fly in southern England.

Please don't turn away. Your responses can make a difference, but only if submitted before 5th April 18.

Please:

- Read the consultation documents.
- Read the additional supplied information in this document.
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Thank you.

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