

BRIZE & OXFORD TIME TO ACT!

The *Consultations* on the RAF Brize Norton and London Oxford Airport Airspace Change Proposals close on Thursday 5 April – here's what you can do...

RAF Brize Norton and London Oxford Airport (LOA) each have *Airspace Change Proposals (ACPs)* which are linked but have been presented as two separate Consultations. The combined bids represent an almost four-fold increase in controlled airspace and are grossly disproportionate to even the most optimistic calculation of air traffic movements. They're also in contradiction of UK airspace policy, as laid down by the CAA, in that 'the default airspace is Class G and that restricted airspace must be fully justified'.

The consultancy which is working for Brize Norton and LOA has indicated that its job is to develop procedures and airspace for clients, and it's the CAA's role to consider the resulting impact on others. Therefore, it's vital that, in addition to cumulative responses from the LAA, BGA, BMAA and our fellow organisations within the GA Alliance, we should all individually respond to both *Consultations*. The closing date for responses is Thursday 5 April 2018, so please act now!

The two *Consultation* documents can be found on the CAA website. For Brize Norton, see www.tinyurl.com/BrizeNortonCons, and the LOA document can be accessed via www.tinyurl.com/OxfordCons

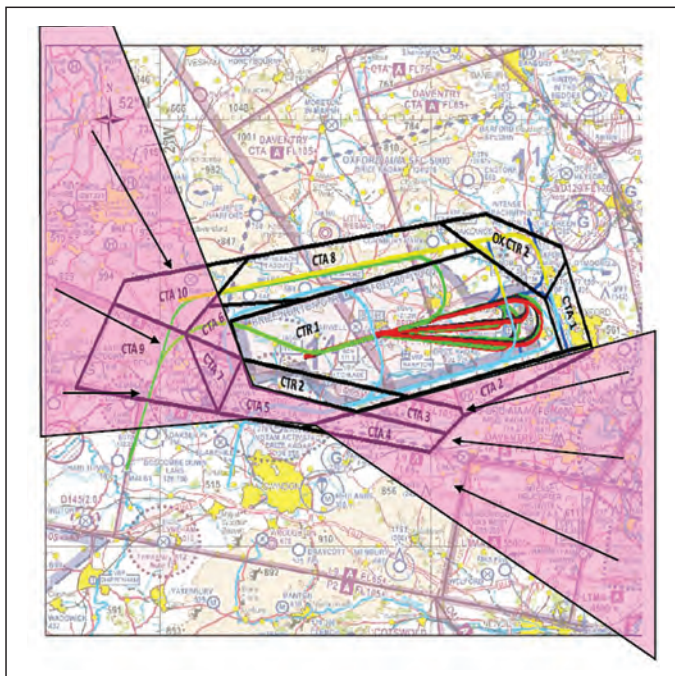
WHAT TO DO NEXT...

Please read the *Consultation* documents, and the additional information herein, then write response emails or letters for both, heading them 'RAF Brize Norton Consultation Response' and 'LOA Consultation Response'.

Don't just 'cut and paste' the points made in this article – consider the issues which concern you. Responding in detail on a few issues you feel strongly about is much more useful than simply listing all of the points raised herein. Also, if you object to the Proposals, please make that clear in your response, eg 'I object to the Airspace Change Proposal because...'

Before 5 April 2018, send your individual email responses about RAF Brize Norton (rafbrizenortonconsultation@ospreycl.co.uk) and LOA (londonoxfordairportconsultation@ospreycl.co.uk). Alternatively, you can send a letter regarding each *Consultation* to: London Oxford Airport Consultation Response or RAF Brize Norton Consultation response, Osprey Consulting Services Ltd, Suite 10, The Hub, Fowler Avenue, Farnborough Business Park, Hampshire GU14 7JP.

We also suggest you copy your responses to the CAA, by emailing airspace.policy@caa.co.uk or posting a copy of your letters to Airspace Regulator (Coordination), Airspace ATM and Aerodromes, Safety and Airspace Regulation Group, CAA House, 45-59 Kingsway, London WC2B 6TE.



The funnelling around RAF Brize Norton and London Oxford Airport which would result from the Airspace Change Proposals.

KEY POINTS FOR BOTH CONSULTATIONS

The following apply to both *Consultations* but, again, please don't just cut and paste them – it's important to use your own words and focus on the issues which concern you.

- We have no objection, in principle, to the application of controlled airspace in situations where rational assessment of risk leads to a logical and proportionate solution. However, the ACPs for Brize Norton and London Oxford Airport (LOA) don't meet those criteria.
- The CAA's statutory duty is to ensure that UK airspace is safe, proportionate and meets the needs of all users. The arguments put forward in these *Proposals* do not meet these objectives. Under the *Transport Act 2000 Section 70*, the CAA has a duty:
 - (a) to secure the most efficient use of airspace consistent with the safe operation of aircraft and the expeditious flow of air traffic.
 - (b) to satisfy the requirements of operators and owners of all classes of aircraft.
- These ACPs only benefit a small number of individuals who wish to take control of a public asset for their exclusive use and gain. There has been no meaningful stakeholder engagement with the GA community. Both *Consultations* refer to stakeholder engagement with local operators prior to the publication of the documents. In previous years, Brize Norton had discussed an initial airspace design with two gliding clubs, while LOA had consulted on a Radio Mandatory

Zone (RMZ). When, in late summer 2017, a meeting took place with the proposers and a small number of stakeholders (many local airfields still haven't been consulted), the combined ACPs were presented not as being subject to consultation, but as final designs.

- The proposed airspace is poorly designed, clearly with no conception of flight outside controlled airspace. It takes no account of prominent ground features for VFR navigation, such as the M40 motorway and the runway at Upper Heyford. The twelve extra segments of controlled airspace have bases at seven different heights, making it a prime target for airspace busts from traffic attempting to circumnavigate the area.
- Both sets of ACPs were being developed under the CAA's CAP 725 process, despite the knowledge that said process was flawed and due for replacement. There are clear signs that both ACPs were hastily prepared to meet the deadline of 1 January 2018, when the CAA implemented a revised, more transparent Airspace Change process, CAP 1616.
- The CAA's advice to GA pilots is to pre-flight-plan on the assumption that they won't gain access to controlled airspace. A study conducted by QinetiQ has identified that the majority of GA pilots choose to fly around controlled airspace. Therefore, to all intents and purposes, much of GA is excluded from controlled airspace.

GA cannot continue to operate within ever reducing areas of remaining uncontrolled airspace.

- All airspace users are concerned about the mid-air collision risk that would result from the funnelling of traffic between areas of controlled airspace, as well as between controlled airspace and the ground, which are known as 'choke points'. These two ACPs generate new choke points and exacerbate the existing ones. The proposed Class D airspace will mean that east-west and north-south transit routes across Berkshire, Buckinghamshire, Oxfordshire and Wiltshire will be highly restricted.

SPECIFIC POINTS: BRIZE NORTON

- Brize Norton operates a small and mixed air transport fleet of heavy aircraft, along with a GA flying club, generating a relatively small number of total annual movements. Military fleet developments will result in less, rather than more, aircraft operating from Brize Norton in the future.
- 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 alternative airspace design that connects Brize Norton traffic to L9 airway and maintains a reasonable level of risk for other airspace users is achievable without adopting the entire *Proposal*.
- Brize Norton uniquely uses military aircraft to fly procedures that airlines practise in simulators, thereby losing all the environmental, cost and scenario benefits which simulators provide.
- Conflict between Brize Norton and LOA aircraft, to the east of the former and south of the latter, is identified as an issue. The *Consultation* overlooks the need for a collaborative ATC environment where controllers for both sites work together, with access to modern equipment. It's unacceptable to load the impact of disproportionate controlled airspace onto those operating outside it, rather than investing in controller resources and processes.
- It's clear that the ACP hasn't adequately considered overall airspace safety. The proposed 'solution' has been produced in advance of fully consulting and understanding the needs of others, or of taking account of the effects of their proposals on those in surrounding Class G airspace. Inward-looking airspace developments do not contribute to overall airspace system safety.
- A number of new choke points will appear and the known existing ones, east and southwest of Brize Norton, will be significantly worsened. This will increase the airprox and collision risk to those operating outside the proposed airspace by a quadratic factor.
- This proposal effectively cuts off much of the central south of England to a large majority of GA traffic and is damaging to both to private owners of aircraft and to flying clubs. A large number of air sport clubs, gliding and GA airfields and operating sites will suffer a reduction in activity. It's likely that some will become unviable and cease operation.

“Both sets of ACPs were being developed under the CAA's CAP 725 process, despite the knowledge that said process was flawed and due for replacement”

- The safety case for the Brize Norton ACP appears to be based on a subjective analysis of airprox reports. It's clear that very few of the reported airprox would have been changed by enlarging the airspace – many were caused by ATC error and most reports in the vicinity of Brize Norton aren't associated with the airfield's traffic. The UK Airprox Board has suggested that the procedures frequently flown at Brize Norton and result in excursions from existing controlled airspace could be practiced in simulators. No mention is made of a mid-air collision in 2009 near Brize Norton airspace, which was partly attributed to Class G traffic airspace constraints.
- 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.
- The current ACP is seriously flawed, in that it takes no account of a planned five-fold increase in USAF deployments to RAF Fairford which, in addition, will begin to handle increased traffic following the service's pull-out from Mildenhall. On these grounds alone, the current ACP should be withdrawn, properly researched and resubmitted.

SPECIFIC POINTS: LONDON OXFORD AIRPORT (LOA)

- LOA has proposed that it should establish a disproportionately large area of Class D controlled airspace to replace Class G, both around its airfield and further afield. This is despite LOA almost exclusively handling GA training and GA business jets, with little if any commercial air transport activity.
- The LOA ACP directly benefits a small number of rich individuals who wish to take control of a scarce public asset for their exclusive use and commercial gain.
- It's abundantly clear that the proposers haven't adequately considered overall airspace safety. The Class D controlled airspace proposed by LOA is unnecessary and grossly disproportionate. It will increase risk for the majority of airspace users who operate in surrounding Class G airspace.
- A number of new choke points will appear and the existing one east of Oxford would be significantly worsened. Consequently, that will increase the airprox and collision risk to those who are operating outside the proposed airspace.
- The LOA proposals will significantly increase the density of traffic and, therefore, the level of risk at existing choke points, generate new ones and result in more traffic

close to or overhead a number of gliding sites, GA airfields and RAF Benson.

- North of Oxford, the proposed controlled airspace will extend to Barford St John, just south of Banbury. This will route traffic which cannot enter the airspace within 1nm of Hinton in the Hedges which, in addition to being a busy GA airfield, also hosts a very active parachute drop zone.
- The northward extension of controlled airspace is allegedly to accommodate procedural approaches into LOA's Runway 19. In fact, few such approaches are made. For such exercises, Oxford-based air training operations prefer to use Gloucestershire, which operates in Class G airspace with just an ATZ, despite handling more than twice the movements of LOA.
- There's no valid safety case to justify the proposed Class D airspace. LOA itself claims that the current operation is tolerably safe. However, LOA also claims the proposed controlled airspace is needed as it has been decided that the airport requires a 'known traffic environment' to ensure risk is as 'low as reasonably possible'. Controlled airspace is intended to provide a risk which is 'As Low As Reasonably Practicable' (ALARP) to fare-paying passengers in Commercial Air Transport (CAT). There's no information in the ACP to suggest that LOA has any CAT, despite numerous mentions of commercial operations, and the ACP makes clear that the airport actually has no plans to increase traffic volumes.
- As briefed by LOA, the safety case for the proposed airspace change around the airport is founded on subjective ATC assessment, based on what they see on their radar screen and, as reported in the *Consultation* document, *Airprox Report 2014065*. The *Airprox Report* actually underlines cultural and systemic issues, including unusually large circuits, which contributed to a non-risk-bearing airprox caused by an Oxford aircraft within the circuit that, having seen another aircraft, failed to take sufficient avoiding action.
- The ACP procedures and associated Class D airspace have been designed without meaningful engagement with GA stakeholders. LOA is seeking to implement a large area of controlled airspace which isn't proportionate to any real operational need, rather it could be argued that the *Proposal* is motivated by the wish to add commercial value to the site.
- LOA has stated that its principal aim is to create a known environment and yet has chosen to ignore the option of using an RMZ, which would achieve exactly that with less disruption to other airspace users. Instead, LOA is seeking the right to control the airspace.
- As anyone who has experience of the Farnborough Lower Airspace Radar Service (LARS) service on a summer's afternoon will testify, the volume of traffic calling for Class D access is likely to be huge. There are significant doubts as to whether it's financially viable or even possible for LOA to offer a radio service which will meet this requirement. Pilots will choose or be forced to fly around the proposed controlled airspace. Their safety will be reduced and airborne movements unreasonably limited and restricted. ■