

Introduction

This guide is written to inform BMAA members about two proposed airspace classification changes. These changes are seen by local microlight pilots and their representative organisation, the BMAA, as significantly detrimental to the availability of airspace for recreational flying, detrimental to flight safety and harmful to the environment. The guide contains links to source documents and details how members can respond to the ongoing consultations.

Background

London Oxford Airport (LOA) is preparing to make a proposal to the Civil Aviation Authority (CAA) to establish controlled airspace in the vicinity of the airport.

Brize Norton (BZN) military airbase is preparing to make a proposal to the CAA to extend the controlled airspace that is already established and controlled by them.

To read the consultation documents follow these links to files held on the BMAA website or visit the home pages of the sponsors.:

[LOA ACP](http://www.oxfordairport.co.uk) www.oxfordairport.co.uk

[BZN ACP](https://www.raf.mod.uk/our-organisation/stations/raf-brize-norton/flying-info/) <https://www.raf.mod.uk/our-organisation/stations/raf-brize-norton/flying-info/>

Because of the close proximity of the airports to each other the two proposals have been collaboratively developed but are to be considered individually. Either proposal can be accepted or refused without reliance on the other.

Any individual or company can propose an airspace classification change. It is usual for changes to be proposed by airport operators or navigation service providers such as NATS.

All airspace change proposals (ACP) must comply with a process published by the CAA. The process has recently changed and is published in a CAA document called CAP1616. The LOA and BZN proposals have been made under the previous process detailed in a CAA document called CAP725.

To change an airspace classification the proposer, called the Sponsor, must go through a procedure that requires design, consultation and finally approval by the Civil Aviation Authority.

Airspace change proposals are required to be “**proportionate to need and consider the needs of all airspace users and people on the ground who may be affected.**” I highlight this section because the opinion of the BMAA is that neither of these proposals meet this requirement.

The consultations that have been published by LOA and BZN are the opportunity for people who will be affected to comment on the proposals. The Sponsor is required to take notice of any comments and include them in its final proposal to the CAA.

A diagram showing the extent of the two proposals is included at the end of this document.

The proposals

The consultation documents published by LOA and BZN are long and complex. I have summarised each below and included links to the full documents at the end of this guide.

BZN ACP

BZN is a military airport catering for many different types of aircraft.

Their justification for their proposal is that it is needed to cater for increased traffic and training needs.

The BMAA concerns are:

that much of the proposed airspace is to cater for training needs which if they were required by a commercial airline rather than a government agency would routinely be carried out in a simulator. This would save cost, reduce noise and emissions and so reduce the environmental impact;

the horizontal and vertical dimensions of the airspace, particularly towards the south and the west will create choke points, areas in which aircraft are forced to fly close together, and closer to the ground. A particular area of concern is the proximity of the airspace to the instrument approach path into Gloucester airport. Choke points increase the risk of collision;

that the choke points created by the lateral and vertical limits of the proposed airspace will concentrate traffic flows leading to increased intensity of noise levels in these areas;

the base of the Areas created around the central Zone are, in many places, too low for gliding flight and in some cases close to the surface thus rendering them unsuitable for safe flight. This further reduces the volume of airspace available for recreational flying;

the base levels of the Areas are varied and create a confusing pattern that will increase the risk of airspace infringements.

LOA ACP

LOA is a private airport catering mainly for private executive aircraft and the training of commercial pilots.

Their justification for their proposal is that it is needed to improve flight safety, although they are keen to emphasise in discussion that flight safety levels of their current operations are not unsafe.

The LOA proposal is to suit two, potentially three, distinct **benefits to themselves**.

LOA Benefit 1

The *Oxford Times* reported that a representative of the owners of LOA confirmed that they want to introduce commercial scheduled flights in the future. The Oxford local plan recognises that LOA has expansion plans. Airlines and high end private aircraft owners want controlled airspace and this proposal would give them that.

BMAA comment.

The people working for LOA on the ACP deny that there are any plans to expand the airport for larger commercial aircraft. The reporter for the *Oxford Times* has confirmed that his report was written in good faith after discussion with the airport owners' representative. The introduction of Commercial Air Transport will increase noise and air pollution levels.

LOA Benefit 2

Improved interaction of aircraft approaching LOA from the south, or taking off towards the south, with aircraft using BZN.

BMAA comment

This primarily requires little additional airspace, but does require better coordination of aircraft using the two airports by LOA and BZN.

The proposed joint solution will establish controlled airspace over Oxford City, leading to overflight of the City which doesn't happen currently.

LOA Benefit 3

The prioritisation of LOA traffic inbound from the north over all other aircraft in the area.

The BMAA concerns with this area of proposed airspace are:

The introduction of controlled airspace to the north of LOA, in conjunction with the extended airspace of BZN, creates a significant barrier to other aircraft wishing to transit or operate within the area without having to obtain a clearance from BZN or LOA.

To obtain permission from LOA a pilot must call the controller by radio. LOA only has one controller station and one radio frequency. A report on a near miss between two aircraft near Chipping Norton pointed out that LOA has limited controller capacity even to deal with their current responsibilities. It is unlikely that LOA will be able to manage an area of controlled airspace, which requires the controller to continually communicate with all the aircraft within it and those wanting to enter, with the limited controller resource and satisfy the volume of traffic wanting to use the airspace. This will inevitably lead to many aircraft routeing around the airspace.

In discussion with LOA it was established that although they had monitored traffic levels for a period to determine controller need, they had not included any glider, hang glider, paraglider or paramotor traffic in their assessment. Therefore it is safe to conclude that they do not know what the real traffic numbers are and so cannot say their needs can be met.

Routeing and the problems

Aircraft that are unable to obtain a clearance from LOA will be forced to fly around the area. Where this has happened in other parts of the UK we know that pilots soon presume they will not get a clearance and so plan to fly around the airspace.

Flying around the airspace creates a funnelling effect bringing aircraft closer together. This increases the risk of collision and concentrates noise over small areas. These areas of congestion are referred to as "choke points".

We have particular concerns about the choke points around the LOA proposal . To the north east, the airspace compresses transiting traffic against the very busy airfield and parachute site at Hinton-in the-Hedges. Further around to the east traffic will be routing close to the extremely busy glider site at Bicester and the Weston on the Green parachute and gliding site. To the south there is created a choke point around RAF Benson.

Justification

The LOA consultation document is written to suggest that the current airspace is unfit for purpose and their proposal will enhance flight safety and reduce environmental impact.

LOA includes in its document instances where aircraft on instrument approaches have been broken off due to unknown traffic. The data included shows that the instances are less than 1.1 a month. These are not safety events where action has to be taken to avoid a collision. They are normal changes of routing to give a separation of 5 miles as chosen by LOA for their own traffic.

LOA includes in its document a table of Safety Events. There are 37, numbered as 47. To the non-aviation reader the impression is that these events would have been avoided if the proposed airspace was in force at the time. In fact, some of the events happened outside the proposed airspace and so the airspace would not have prevented the event.

Many of the events were the result of poor communication between:

- LOA Air Traffic Control (ATC) and their own aircraft;
- between BZN ATC and their own aircraft;
- between LOA and BZN controllers.

The introduction of controlled airspace would not have prevented these events, indeed unless LOA and BZN improve their ATC performance it is likely that there will be an increase in these events as more pilots are required to communicate with ATC increasing their workload.

BMAA View of Pre-consultation and Misrepresentation

The consultation is written in such way as to suggest that local and national aviation organisations and individuals have been consulted prior to the release of the design and that by inference agree with the design.

The BMAA considers this content misleading. There was limited discussion with local and national aviation representatives prior to planning the final proposal. Alternative suggestions which would meet the needs of LOA to create a known traffic environment and largely satisfy other airspace users, who are also keen to maintain flight safety, were rejected, because they do not give control of the airspace to LOA.

The only supporters of the proposal that we are aware of other than LOA are a small group of pilots who fly from LOA.

LOA suggest that they have met with organisations and taken their views into account. I have attended several of these meetings. At the last, with the General Aviation Alliance (GAA), we were told that the meeting was not a consultation but a briefing. The final design had been completed and no changes would be made. To say that there have been consultation with organisations representing recreational aviation interests is misleading the consultee

Summary

The BMAA, as the representative body of microlight pilots, strongly objects to the LOA ACP on the grounds that:

- it is not needed for flight safety reasons;
- it has the potential to reduce flight safety;
- it will reduce airspace availability for other legitimate users;
- it has the potential to increase the environmental impact of aviation emissions by creating more track miles to be flown to pass around the airspace.
- it has the potential to increase the environmental impact of aviation emissions by creating noise hot spots.

Responding to the consultations

The BMAA will respond to both consultations on behalf of the members.

It will be made clear in each response that the BMAA does not support either of the proposals and we will outline in detail why we think they are unnecessary, disproportionate and a threat to flight safety as well as failing the requirement to be **“proportionate to need and consider the needs of all airspace users and people on the ground who may be affected.”**

When consultation responses are received it is important that they are seen to be the considered views of individuals. And so the BMAA is not providing a pro-forma or petition for members to sign. A petition with 1000 signatures will be treated as a single response. 1000 individual responses will be treated as 1000.

As a guide:

- make sure that you make any objections expressed as you see them in your own words;
- if the proposal will affect you directly, make sure that you make that clear;
- make it clear that you are objecting to the proposal;
- **don't miss the deadline of 5th April 2018.**

To respond to the consultations use one these options:

LOA

By Email:

londonoxfordairportconsultation@ospreycl.co.uk

Please entitle your email, 'LOA Consultation Response'.

You may also submit your response directly through the website at:
<http://www.oxfordairport.co.uk>, and follow the appropriate link.

By Post

Please send your responses to:

London Oxford Airport Consultation Response,
Osprey Consulting Services Ltd.,
Suite 10,
The Hub,
Fowler Avenue,
Farnborough Business Park,
Farnborough,
GU14 7JP

BZN

By Email

rafbrizenortonconsultation@ospreycl.co.uk

Please entitle your email RAF Brize Norton Consultation Response.

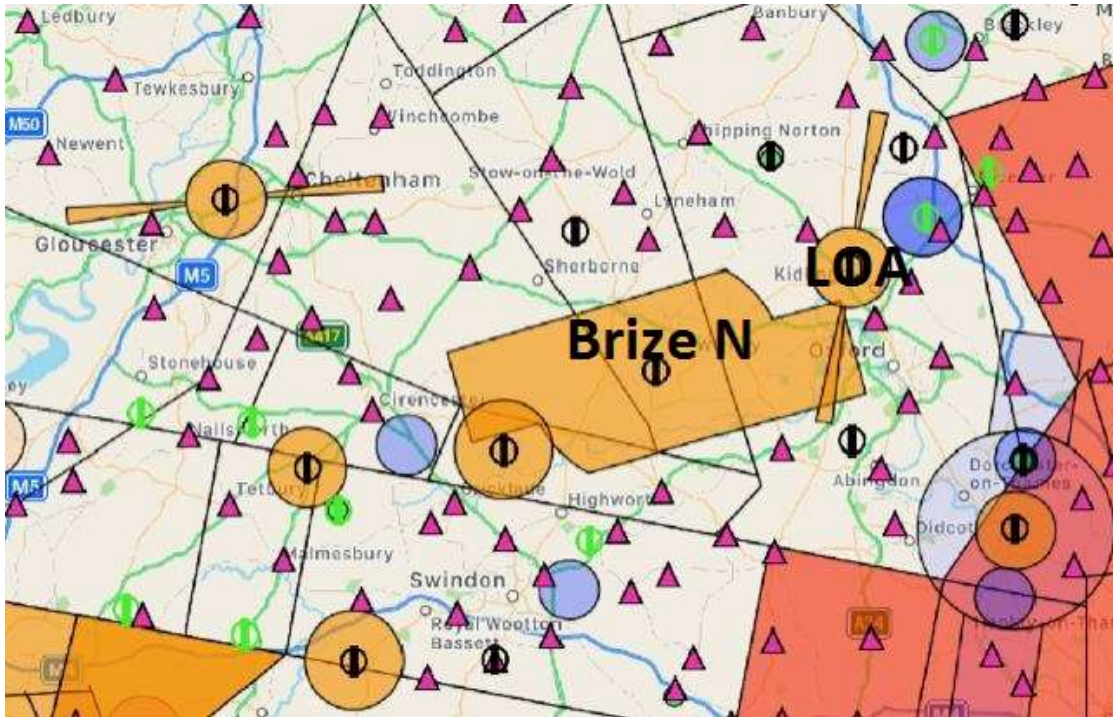
By Post

Please send your responses to:

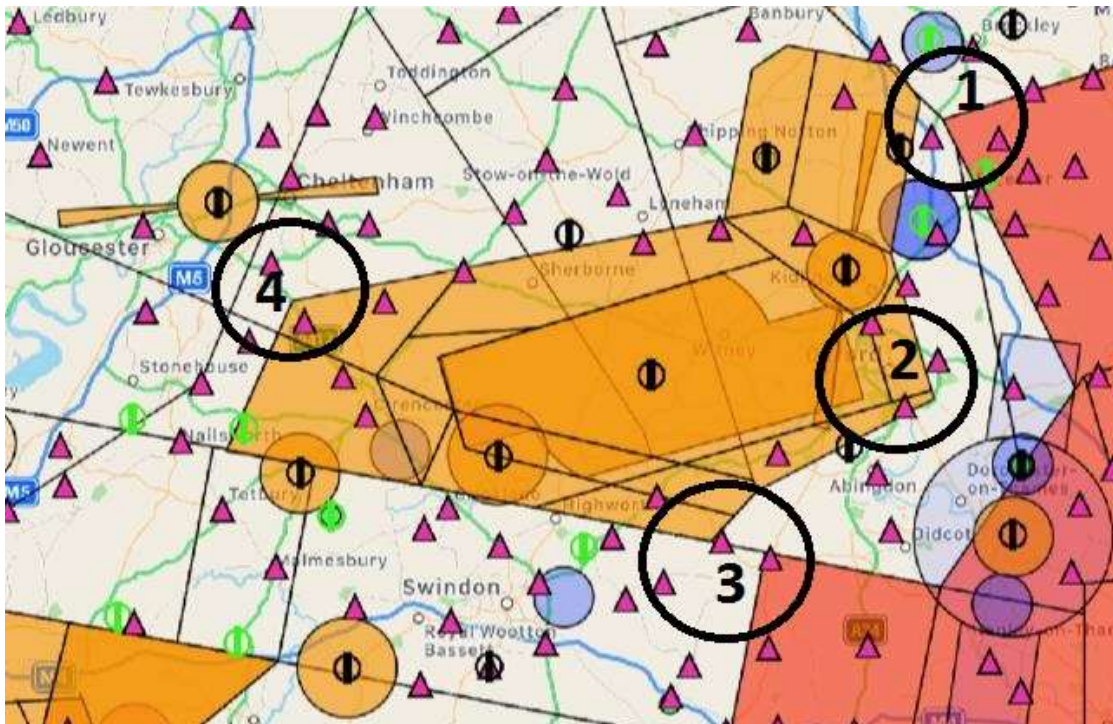
RAF Brize Norton Consultation Response
Osprey Consulting Services Ltd
Suite 10, The Hub
Fowler Avenue,
Farnborough Business Park,
Farnborough
GU14 7JP

Airspace maps:

Current airspace. The lighter orange in the centre is BZN. LOA has a circle of airspace around it. The arrows leading into the circle show the approach paths, but are not controlled airspace.



Proposed airspace.



Numbers 1,2,3,4 show choke points. 2 is Oxford City