

THE OXFORD & RAF BRIZE NORTON CHANGE PROPOSALS

With the concurrent *Consultations* regarding the *Airspace Change Proposals* closing on Thursday 5 April, LAA CEO Steve Slater asks, "What can we do about it?"

Even by the standards of recent *Airspace Change Proposals*, the *Consultations* launched by Osprey CSL, on behalf of RAF Brize Norton and London Oxford Airport, potentially represent one of the most devastating blows to VFR flying ever seen in the already congested airspace of southern England.

The combined bids would increase the area their respective CTRs and CTAs by a factor of roughly three, bringing it close to the size of Luton, a scale which is totally disproportionate to even the most optimistic calculation of air traffic movements for the two airfields.

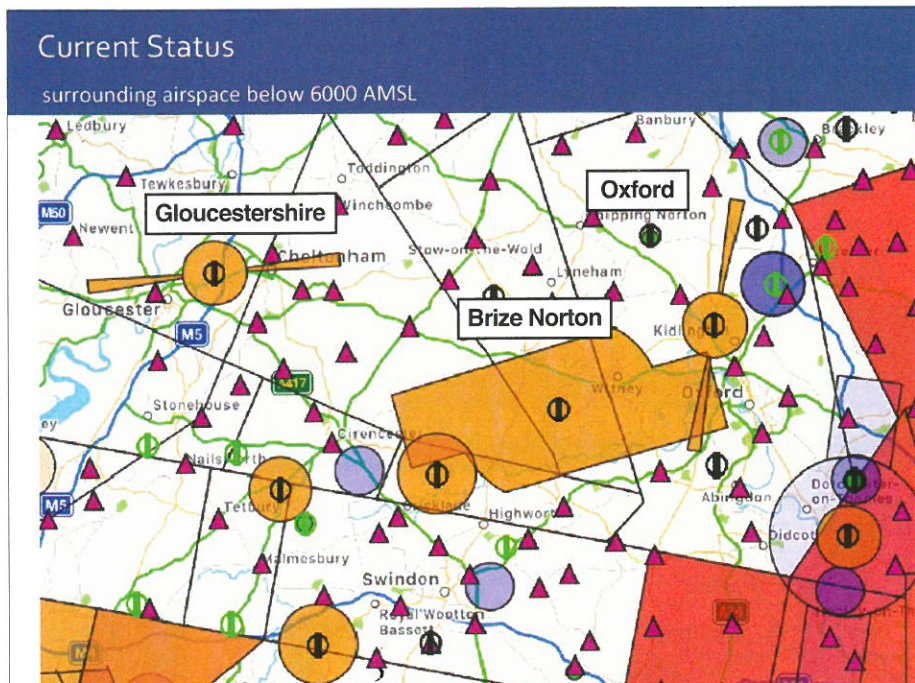
Worse still, the proposed airspace is incredibly poorly designed. It takes no account of prominent ground features for VFR navigation, such as the M40 motorway and the giant runway at Upper Heyford. The twelve extra segments of controlled airspace have bases at seven different heights, making it a prime target for air space busts from traffic attempting to circumnavigate the airspace.

PINCH-POINTS

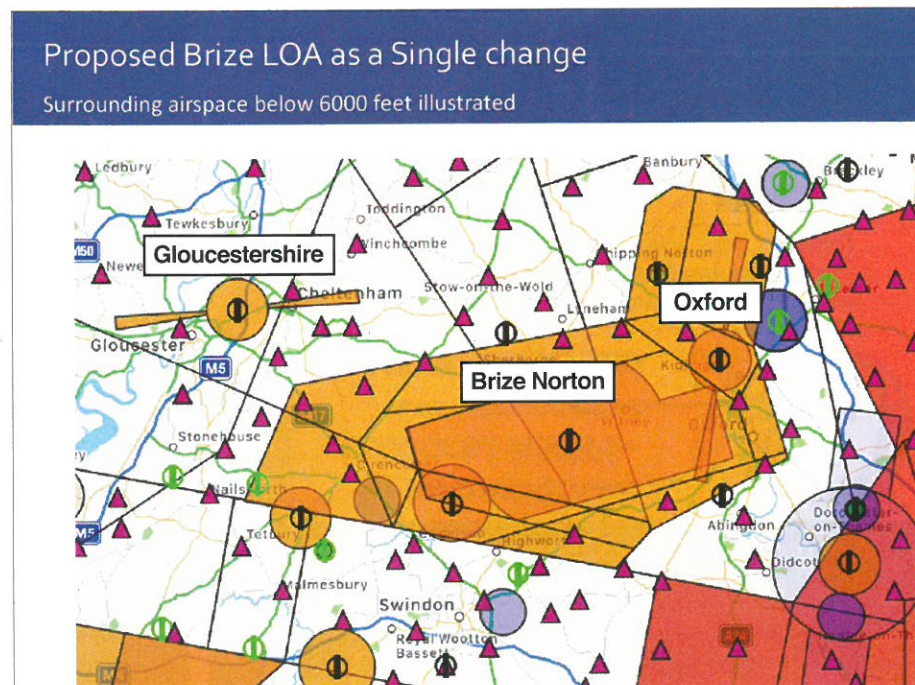
To the north of Oxford, the proposed controlled airspace will extend to Barford St John, just south of Banbury. Take a look at the top right corner of the second of the two diagrams produced by the British Gliding Association (BGA), shown below right, and you'll see a pronounced 'pinch-point', routing traffic which cannot enter the airspace within 1nm of Hinton-in-the-Hedges. In addition to being a busy GA airfield, Hinton also hosts a very active parachute drop zone – I'll leave the potential consequences to your imagination!

This northward extension of controlled airspace is allegedly to accommodate procedural approaches into Oxford's R19. In fact, few such approaches are made. Even the local Oxford-based air training operations prefer to use Gloucestershire for such exercises, operating in Class G airspace with just an ATZ, despite handling more than twice the movements of Oxford.

London Oxford however, is using this as justification to potentially block E-W traffic from a heavily-used swathe of airspace to the north of Oxford, restricting and excluding those known to be operating from Weston-on-the-Green, Shotteswell, Bicester, Hinton and Enstone, as well as several private airfields in the area. It'll also hit airfield utilisation at Chiltern Park, Turweston, Sywell, Wellesbourne and further afield, as en-route traffic will almost certainly be affected.



Diagrams produced by the BGA, showing the current areas of controlled airspace (above) and the increased area, with narrower pinch-points, if the *Proposals* were to go ahead.



(Above) Gliding sorties flown from Ashton Down, 2012-2014 – the proposed new airspace will great even narrower pinch-points.

In addition, to the west, the proposed Brize Norton Class C airspace will extend beyond Kemble, creating a significant impediment to north-south traffic. Combined with the proposed airspace surrounding Farnborough, it has the potential to, at the very least, result in more pinch-points and, at worst, become an impenetrable barrier to VFR navigation.

Again, there appears only tenuous evidence that Brize Norton's procedural training requirements, for such aircraft as the Hercules, Globemaster, Atlas and Voyager, justifies the scale of the proposed airspace. The majority of this training can now be done, at a lower cost to the taxpayer, in simulators. In fact, during the whole of December, the airfield's total number of training sorties numbered just 27, and its busiest day in January saw only nine flown. Hardly Heathrow, is it?

As with the Farnborough airspace bid, the gliding community are set to be most heavily penalised, with Lasham, Nympsfield and Aston Down, three of the biggest (and most ambitious, in terms of cross-country gliding) in the UK, struggling to see how many of their 'goal' flights could be achieved.

Sites close to the restricted airspace, such as Bicester, Enstone and Sherington, will see their training flights inevitably restricted, while some locations, like Weston-on-the-Green, may potentially close. Competition glider flights are very accurately tracked so we can readily see just how much they could be affected.

Take a look at the third diagram, shown above, which documents flights from just one location (Aston Down) and you can then figure, if access to the controlled airspace is restricted, how busy those pinch-points are going to become on a good weekend for soaring!

LACK OF TRANSPARENCY

Adding insult to injury is the somewhat cynical manner in which the information surrounding the *Consultations* has been presented.

Although initial scoping discussions began in 2014, it's obvious that the official

Consultation documents were hastily rushed out on 15 December 2017, one suspects largely to 'beat' the deadline of 2 January 2018, when new Airspace Change consultation rules came into force, with *CAP1616* demanding greater transparency.

Certainly, there are signs that, in Osprey's haste to beat the deadline, a number of errors have crept in. For example, a significant number of diagrams have been distorted, deliberately or otherwise, with their vertical scales compressed, giving an inaccurate impression of the scale of the proposed airspace. In addition, the two ACPs, for Brize and Oxford, are only presented individually. Nowhere in their lengthy documents (121 pages for Oxford, 84 for Brize) will you see images, as shown here, on the opposite page, reflecting the full extent of the total controlled airspace proposed.

There are other howlers, too. Some of the (up to a decade or more-old) 'airproxes' quoted in justification of the Expanded Class C airspace are erroneous. One conflict (20140809), only occurred when the aircraft in question inadvertently entered the Oxford ATZ and came into conflict with another aircraft downwind on a visual circuit to R19. Meanwhile, 27 out of the 43 Brize Norton-recorded 'airprox incidents' involved aircraft arriving at or departing from Kemble.

These should have been dealt with under a *Letter of Agreement*, and extending the controlled airspace wouldn't have mitigated the alleged risk.

WHAT'S THE LAA DOING?

The LAA, as part of the General Aviation Alliance, is already assisting in a strategic approach, namely formal *Letters of Objection* to the two *Consultations*.

Meanwhile, the GA Alliance is also in discussion with both the CAA and the Department for Transport. The lead organisation in framing this response is the British Gliding Association, with the

LAA and Bristol and Gloucester Gliding Club member, Steve Noujaim, heading the team.

We're also considering writing to Osprey and the CAA, proposing that, until accurate consultation rules are presented, we shouldn't consider the *Consultation* period to have started. If this were to be accepted, it would, of course, mean that the *Consultations* will be required to follow the new, more transparent CAA *Air Change Process (ACP) (2)*.

WHAT YOU CAN DO.

The first thing is that, *before 5 April*, we all need to complete either the online 'Consultation Form' at www.oxfordairport.co.uk/the-airport/public-consultation-2, or write an email direct to London Oxford Airport at consultation@londonoxfordairport.com.

The RAF doesn't appear to have an online form, but you can email rafbrizenortonconsultation@ospreycl.co.uk.

Alternatively, you can send a letter for 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.

In addition, if you wish to express your personal concerns, contact the Airspace Regulator (Coordination), Airspace ATM and Aerodromes, Safety and Airspace Regulation Group, CAA House, 45-59 Kingsway, London WC2B 6TE or email airspace.policy@caa.co.uk.

Do feel free to use any of the points raised in this article to support your argument, plus I suspect you might find a few of your own. We'll also doubtless be coming up with some other ideas in the immediate future, so keep an eye on the LAA website and Facebook page (www.facebook.com/lightaircraftassociation) for more news. I'll also prepare a further update for next month's edition of *LA!*

With thanks to Steve Noujaim, Peter Stratten, Geoff Weighell and David Joyce for the supporting information. ■