**London Oxford Airport**

**Document text concerns**

The LOA application proposes the establishment of Class D zones and associated Class D areas. The proposed airspace to the north of LOA is designed to protect aircraft on approach to LOA runway 19. The proposed airspace to the south interacts with Brize Norton airspace. The consultation document claims that this airspace proposal has been instigated by a rising number of events in the airspace and is considered to be a last resort and the minimum measure to achieve an improved level of safety for their aircraft. It also claims to improve the environmental impact of aviation by reducing the number of instrument approaches that have to be broken off as the result of conflict with unknown traffic.

The document makes statements that might be considered misleading.

| Page / Para reference | Consultation Text | Question |
|---|---|---|
| Page iii | *On many occasions LOA have needed to break aircraft off from their final approach to ensure safe separation from conflicting traffic.* | *"many occasions*" refers to their own evidence later of 23 instances in 22 months. That is 1.1 a month. Is this a justification for controlled airspace? There was no danger to these aircraft, because action was taken.<br>Breaking off an approach, or just altering course in open airspace when aware of another aircraft is standard procedure. |

| Page / Para reference | Consultation Text | Question |
|---|---|---|
| Page 7<br>1 | *LOA has identified a requirement to propose changes to the classification of airspace surrounding the airport to protect new Instrument Approach Procedures* | There is no legal requirement for controlled airspace around an instrument approach. This statement is misleading.<br>LOA want to establish controlled airspace so that their aircraft have priority over other aircraft in the currently shared airspace.<br>Other local aerodromes with more traffic manage very well without controlled airspace along the instrument approach, For Example Gloucestershire and Cranfield |

| Page / Para reference | Consultation Text | Question |
|---|---|---|
| Page<br>14<br>2.3.4 | *Within the existing airspace arrangements, it is often the case that aircraft transit the ILS centreline just below the cloud base without making radio contact with LOA.* | There is no indication of what is meant by "often". This statement is misleading and not backed up by relevant fact. |

| Page / Para reference | Consultation Text | Question |
|---|---|---|
| Page 26 5.2.2 | A study was conducted to record the details of those occasions when aircraft were instructed to break off an approach because of unknown conflicting aircraft not operating on LOA radio frequencies. The results of this study are included at Annex A2. | This sentence is misleading. Annex 2 records Aircraft Operating in Approach Area RW 19 August 2015. 195 aircraft. It does not record the number of aircraft instructed to break off. That number is recorded in Annex 3 as 23 in 22 months.<br>It could be interpreted that the consultation document has been deliberately constructed to mislead the consultee to believe that the incidences of instructions to break off has been 195 in one month, rather than just 1.1 per month, a considerable reduction. |

The document also lists a number of Safety Events. The assumption is that these are included to suggest that there is a need for the proposed airspace on safety grounds. 38 instances over 9 years. Many are down to Oxford ATC errors, Oxford aircraft pilot errors, poor interaction with Brize Norton and some many miles outside the proposed airspace so that they are irrelevant.

The proposal would have had no effect on the majority of these cited Safety Events. In fact a conclusion could be drawn that many of them were caused directly by poor interaction between Oxford controllers, Brize Norton controllers and their home based aircraft, that any further increase in responsibility for traffic control may cause even more such Safety Events.

**Potential increased flight safety risk – aircraft collisions.**

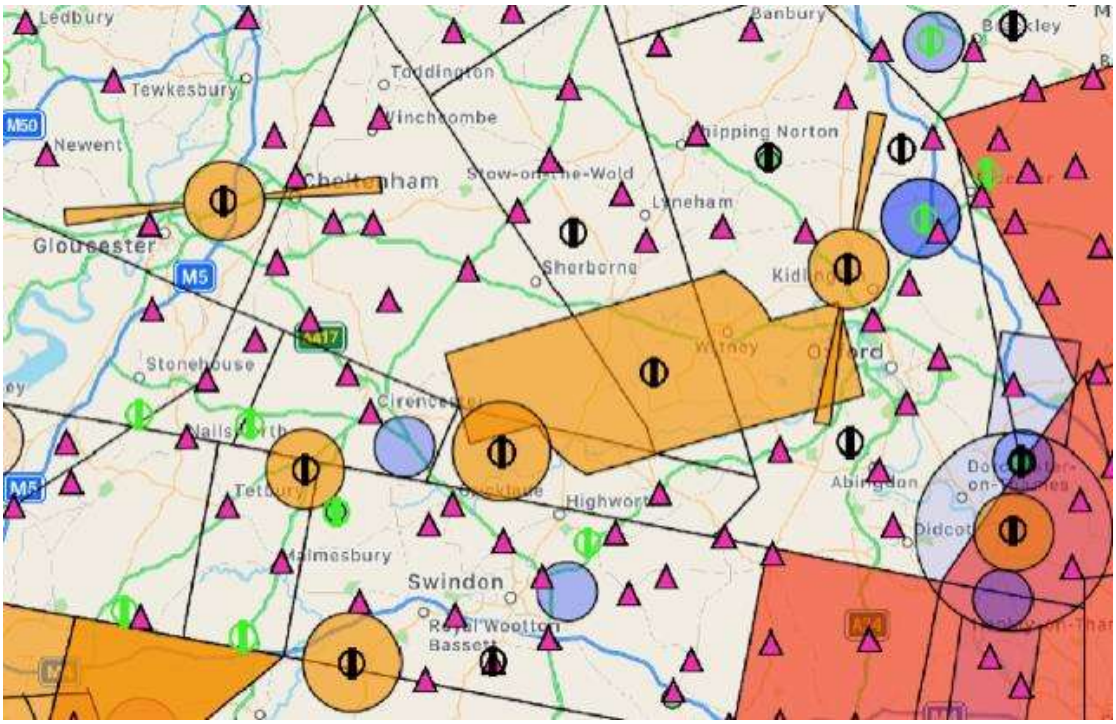
Throughout the pre-consultation discussions Oxford have not been receptive to alternative suggestions put by other airspace users.

There are real concerns among other airspace users that the proposed airspace will reduce flight safety outside the airspace boundaries. To enter controlled airspace the controller must give each aircraft permission. It is generally considered that each controller has a limited capacity restricting them to managing just four or five aircraft at any one time. Lack of controller capacity has already been cited in a report of a near miss between two aircraft in the Oxford area. (AIRPROX REPORT No 2015094 *It was noted that for traffic under a Basic Service hazard advice would be passed when workload permitted; Oxford Radar is a single manned control position in an AIAA and is often subject to high workload*.). Therefore it is likely that the majority of aircraft requesting access to the airspace, but not intending to land at or approach Oxford will be refused entry due to controller workload.

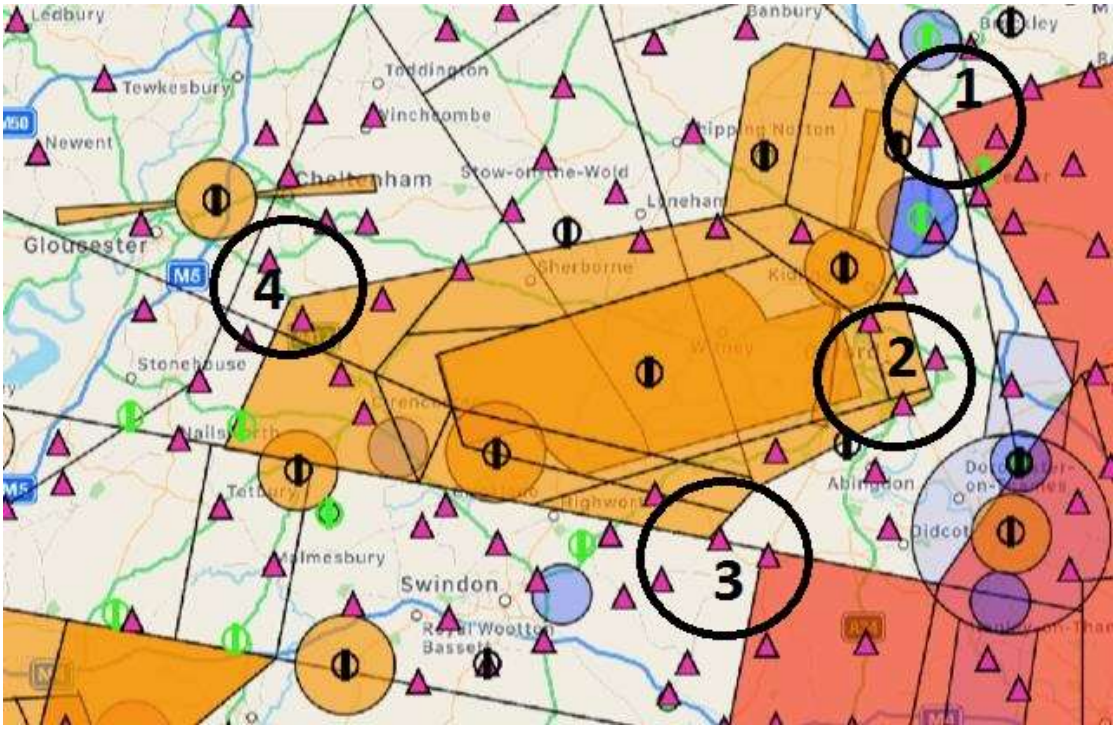
In discussion Oxford admitted that they had not included any glider, hang glider or paraglider traffic in its traffic forecasts and so is, in our opinion, unable to justify any statement that might suggest that they have sufficient controller capacity to meet demand.

The result will be that transiting aircraft will be forced to route around the outside of the controlled airspace causing congestion and increasing the risk of collision. Aircraft collision is a real threat to life both in the air and on the ground. Note a recent event close to Waddesdon Manor, Bucks. Four dead. Daily Telegraph report

The images below show how the proposed airspace will increase the risk of collision by squeezing aircraft between the new and existing airspace.




Existing airspace. Brize Norton in the centre in orange.




Proposed airspace, centre in orange, with pinch points at 1,3, 4.

Proposed airspace extends over Oxford City at 2

1) Significant pinch point very close to Hinton in the Hedges Parachute and Gliding site, Bicester Gliding site, Weston on the Green Danger area.

2) Airspace extends over Oxford City. Creates a pinch point between the airspace and Benson Military Traffic Zone.

3) Southern extension creates pinch point and low level base prevents gliding traffic.

4) Proximity of airspace to the approach path for Gloucester creates the problems that Oxford say they are trying to avoid. Low level base of airspace prevents gliding traffic and forces powered aircraft low.

**Pre-consultation engagement**

*A good deal of pre-consultation engagement was conducted by LOA with the BGA, LAA, BHPA and the GAA. The views of these organisations have been recorded and will be part of the formal proposal that is presented to the CAA following the public consultation.*

The pre-consultation engagement with the GAA took place on the 28th September 2017. The meeting opened with a statement that the meeting was not an opportunity to influence the design of the airspace , but merely a briefing on what was going ahead.

The pre-consultation engagement with the BGA and BMAA took place on the 15th August 2017. The views of the associations were put to LOA but all alternative proposals were rejected.

The phrase "*A good deal of pre-consultation engagement was conducted by LOA with the BGA, LAA, BHPA and the GAA."* Suggest that there was an opportunity to influence the design. This was not the case. Under the new process for requesting controlled airspace, introduced in January 2018, proper pre-consultation is required. The Oxford efforts would not have complied what is now in place and what, at the time, was published by the Department for Transport as good practice.

**Alternative options**

The LOA dismisses alternative options out of hand.

GAA members agree that improved communication between aircraft and ground based controllers can improve safety and efficiency of flight. However there is another way to achieve better communication which has been discarded because it doesn't allow Oxford to claim control of the airspace, we believe their primary goal rather than just operating in a known environment which would satisfy their safety concerns.

In 2015 the UK Civil Aviation Authority published a Policy Statement (Link) for the use of an airspace safety measure called a Radio Mandatory Zone (RMZ) The policy includes the statements:

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The CAA's statutory obligations within reference A include the need to 'satisfy the requirements of all airspace users', and to 'secure the most efficient use of airspace consistent with the safe operation of aircraft and expeditious flow of air traffic'. This has enabled the principle that the least restrictive categorisation of airspace should be the norm in UK airspace design, with more restrictive classifications only being established where necessary when the safety need is clearly demonstrated.

Where additional measures to enhance flight safety are required, but the establishment of a more restrictive classification of airspace is not warranted, proportionate measures are necessary. Such measures include the establishment of either an RMZ or a TMZ. The creation of an RMZ/TMZ allows the airspace to retain its original classification, yet also allows for enhanced situational awareness for all users and for ATC. This therefore increases safety for all aircraft flying in that block of airspace while imposing minimal additional restrictions.

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The establishment of Class D airspace as proposed by LOA, in our opinion, does not satisfy the CAA policy to "satisfy the requirements of all airspace users" or "secure the most efficient use of airspace consistent with the safe operation of aircraft and expeditious flow of air traffic".

The establishment of a RMZ would satisfy the LOA need for a known traffic environment without significantly disadvantaging other airspace users or creating significant safety risks as the proposal as it stands does.

There is a precedent for such airspace in the local area. When the US Airforce operated heavy transport aircraft and fighter bombers from RAF Upper Heyford a mandatory radio area, the equivalent of the RMZ, was established to create a known traffic environment. This worked extremely well, proving that controlled airspace is not needed for the safe operation of aircraft of significantly different types.