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Date: Thursday, 5 April 2018 at 15:31
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Subject: Response - RAF Brize Norton Consultation

The Honourable Company of Air Pilots **objects** to the chosen option in RAF Brize Norton Consultation - Airspace Change Proposal ref 70751 029 Issue 1 dated 15th December 2017.

The Company recognises the desire for a known ATC environment within which to operate RAF military transports safely but believes the consultation's preferred option of expanding Class D airspace needs to be re-considered in the wider context of all users of UK airspace. Specific observations on the consultation document include the following:

- Para 3.3 Driver for Change suggests that large aircraft are unsafe if they are outside controlled airspace (Class D); this pre-supposes a solution whereas the actual requirement is that they remain within a 'known ATC environment.'
- Para 3.3.1 mentions GA infringements posing a threat and increasing Brize Norton ATCO workload. Infringements will be an increasing issue if GA are driven into ever-tighter funnels round the periphery of controlled airspace because they are unable to expect or obtain timely crossing clearance/coordination. This proposal moves the problem, it does not resolve it.
- Fig 2 shows that existing measures already have an impact and there is no mention is made of. It is premature to seek major change without understanding the full scale of improvement as these and the CAA's Airspace Infringement campaign measures will achieve, especially when that change could disadvantage significantly other airspace users.
- Para 3.4 says one driver for enlarging the current Class D airspace is to accommodate live (rather than simulator) training in pilot-interpreted procedures. The Air Pilots does not challenge the benefit of live training but notes first that that the world's airlines and civil regulators find simulator training is adequate to for pilot practice (and testing) in pilot-interpreted procedures. We also question whether repeated practice at home base would achieve the training aim stated or whether using other aerodromes might provide a more diverse and challenging training opportunity. The relevance of war zone operations to the pilot skills required to fly pilot-interpreted approach is not explained; more varied live or simulator training, especially the latter where battle damage can be injected into the training, might be more beneficial.
- Annex A3 over-states data on STAR/SID deviation because it does not differentiate between airspace-related deviations and others. Therefore, the case for change is weaker than the document suggests.
- Similarly, Annex 5 over-states the data on Airprox; e.g. a Tornado/Merlin Airprox over 17nm NW of Brize on LARS frequency would not have been prevented by extending the CTR. Therefore, the case for change is weaker than the document suggests.

We do not believe the need to increase Class D volume and disadvantage significantly non-Brize Norton air traffic is proven. Even if it were, it could not be deemed acceptable without a guarantee of an increased controlling authority ATCO complement and daily manning sufficient so that other users could be coordinated and maintain access as at present.

The Honourable Company of Air Pilots is in favour of measures that increase overall safety that are proportionate and equitable, i.e. they recognise the needs of all users rather than just one component. We believe the proposal to establish a large swath of Class D airspace rather than a more comprehensive assessment and consideration of alternatives such as RMZ/TMZ is not supported by the evidence provided and is premature, especially as it is matched with a London Oxford Airport proposal to establish a swathe of adjoining new Class D airspace. Amongst alternatives, a RMZ/TMZ solution offers the potential to avoid compressing GA aircraft into ever-tighter choke points and increases the safety of all users by providing the 'known environment' that RAF Brize Norton was seeking.

Exclusion of others has been the traditional UK approach to resolving potential air traffic conflicts but it is not a viable long term solution, especially in areas of high demand and when new players – e.g. un-manned air vehicles – are demanding access. Therefore, future airspace changes must be designed to enable safe access for all users and not to prioritise one sector to the exclusion of others.

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[About the Honourable Company of Air Pilots](#)

The Company was established as a Guild in 1929 in order to ensure that pilots and navigators of the (then) fledgling aviation industry were accepted and regarded as professionals. From the beginning, the Guild was modelled on the lines of the Livery Companies of the City of London, which were originally established to protect the interests and standards of those involved in their respective trades or professions. In 1956, the Guild was formally recognised as a Livery Company.

In 2014, the Company was granted a Royal Charter in the name of the Honourable Company of Air Pilots and today its principal activities of the Company are centred on sponsoring and encouraging action and activities designed to ensure that aircraft are piloted and navigated safely by individuals who are highly competent, self-reliant, dependable and respected. The Company fosters the sound education and training of air pilots from the initial training of the young pilot to the specialist training of the more mature. Through charitable activities, education and training, technical committee work, aircrew aptitude testing, scholarships and sponsorship, advice and recognition of the achievements of fellow aviators world-wide, the Company keeps itself at the forefront of the aviation world.