

**From:** daa <daa@airpilots.org>  
**Date:** Wednesday, 4 April 2018 at 18:35  
**To:** "LondonOxfordAirportConsultation@ospreydsl.co.uk"  
<LondonOxfordAirportConsultation@ospreydsl.co.uk>  
**Cc:** AirPilots <office@airpilots.org>  
**Subject:** RESPONSE - London Oxford Airport Airspace Change Proposal

The Honourable Company of Air Pilots **objects strongly** to the London Oxford Airport Airspace Change Proposal as described in issue 1 of its consultation document dated 15<sup>th</sup> December 2017.

Our objections arise from the a review of the document text as follows:

Para 5.2.2 of the consultation document states, “...*in the very near future* the risks associated with flying these procedures in uncontrolled airspace will no longer be ALARP.” However, it is impossible to judge whether this is true and on what evidence it is based; no supporting evidence is presented for what would seem to be at the core of LOA’s requirement for change. Furthermore, CAA figures for LOA Commercial Air Transport (often Air Taxi rather than airliner) and business aviation movement numbers suggest the current risk level is actually quite low.

Para 5.3.1 indicates that ‘listening squawk’ - has been effective in reducing the number of approaches that were broken off, which suggests a reduction in controller workload, while para 5.3.2 indicates that the number of aircraft not using ‘listening squawk’ or calling ATC has not reduced. Yet, having shown the clear benefit in seeking increased use of ‘listening squawk’, that option is discounted almost out of hand.

Para 5.3.2 also indicates that part of the rationale for a move towards Class D controlled airspace is the “...wide mix of nationalities that operate in and out of LOA. Some foreign pilots are not familiar with the nuances of the rules associated with ... ATSOCAS” so that it is “deemed unsafe to vector aircraft into potential confliction, even if a Traffic Service is being provided.” ATSOCAS might be poorly understood within the GA community at large, whether foreign or not, but taking exclusive control over a large chunk of airspace that is used by a large number of pilots not operating into LOA cannot be an appropriate solution to ATSOCAS issues.

Para 5.4.2 dismisses the RMZ option (notwithstanding the proven benefits of ‘listening squawk’) on the grounds of “airspace complexity.” While ATC might perceive a RMZ (or TMZ) to increase airspace complexity, it not a factor for pilots. Airspace change needs to address the issues of all users, not a single element.

Para 6.3 discusses the need to coordinate with Brize Norton procedures. This has always been the case - and has been done successfully; if coordination under current arrangements is becoming more difficult, it might be better resolved by an increase in ATC staff or adjustment of procedures rather than a massive increase in controlled airspace.

Para 6.4.1 raises two issues:

- a. It seems rather disingenuous to claim pre-consultation engagement with airspace users such as BGA, LAA, BHPA and GAA and then not reflect the nature of their reaction to that engagement, especially as just cursory glance at their websites reveals the strength of their opposition.

b. In states, “It should be noted that other airspace users will not be prevented from entering the airspace. The intention is to improve safety in an area widely acknowledged to be congested. All aircraft can use a radio to gain access and transit the area, remaining compliant with the standard ATC rules. Those aircraft that are not radio equipped can gain access to the area by prior arrangement if required. These structures and procedures will ensure a managed and safe operating environment for all.” Nonetheless, the proposed large volume of airspace will present a barrier to non-CAT/IFR airspace users that can only be overcome by gaining permission from an ATC control office (ATCO). This would only be possible if the number of ATCO was increased to cope with the increase in workload that all the new requests to penetrate the airspace will generate. Experience elsewhere is that ATC complement does not increase to compensate for the increased demand created by large blocks of airspace; accordingly, GA users are no longer able to access the airspace and instead must skirt round the edges. This increases the density of GA traffic around the edges and transfers the collision risk from the controlled airspace to non-controlled airspace. The consultation document fails entirely to address this.

Para 7.2.1 says, “Controllers would still approve access to the airspace by those that require it, **provided there would be no conflict with aircraft positioning for an instrument arrival.** Approval to access the airspace would be subject to specified conditions (within a clearance instruction) and would always be given if the controller deemed aircraft would be unlikely to generate conflicts.” This again raises the question of whether there will be enough ATCOs to offer a service to non-instrument arrivals; it also legitimises refusal of clearance for one set of users in favour of others. Without an indication of the intended increase in ATCO complement to cope with coordination of those requiring access and those on instrument approach, the proposal is totally inequitable.

Para 7.4.2 says of permitting special events to continue that LOA, “would be prepared to develop a temporary LOA” which falls far short of a commitment to support existing airspace users.

Para 7.5.3 “if this proposal is successful, the provision of controlled airspace would be attractive to some commercial operators who do not currently choose to utilise LOA.” This flies in the face of Robin Hood where increased airspace and disruption to GA users did not generate an increase in commercial traffic. It also suggests that the proposal is made with an expectation to disadvantage the GA community in order to improve the airport’s commercial situation.

LOA commercial traffic has risen by only a little over 1% in the last 4 years. This makes it difficult to justify such major airspace changes.

The Honourable Company of Air Pilots is in favour of measures that increase overall safety providing they are proportionate and recognise the needs of all users rather than one segment. UK airspace should be shared and restricted only in a way that balances the competing demands on it in a reasonable and equitable way. In this consultation, the need is not properly established. Even if it were, the proposal to establish a large swath of Class D airspace is not proportionate and fails to provide a balanced consideration of alternatives such as RMZ/TMZ. The TMZ/TMZ solution avoids compressing GA aircraft into ever-tighter choke points; it actually increases the safety of all users by providing the ‘known environment’ that LOA was seeking in the first place.

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**John Turner BA FRAeS**  
Director of Aviation Affairs

## **The Honourable Company of Air Pilots**

Dowgate Hill House  
14-16 Dowgate Hill  
London EC4R 2SU  
www.airpilots.org +44(0) 2074 044 032

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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.