

[REDACTED]

From: [REDACTED]
Sent: 18 June 2020 16:08
To: [REDACTED]
Subject: RE: 20200616-RAF Little Rissington ACP
Attachments: A4A VSA LAYER MAP with MAC Data V7.kmz

Thanks [REDACTED],

If you open this file (in Google earth) and move to the UK you will see everything in the file. Scroll down the left side and uncheck the A4A VSA layer map heading box to get rid of all the overlay data.

You can then selectively select types of airspace to display
VSAs

MAC locations – right click a triangle to display details. Different colours for different classes of MAC. The numbers cross refer to the collision risk paper annex (you may not have had that from the link I sent earlier – they were missing and our IT man just uploaded them again.

Gliding VSAs

Gliding tracks heat map (shading represents density)

Paragliding Clubs/launch sites/activity (individual tracks not shading as heat maps) – right click for name of site and contact details for main club sites.

Have fun - contact me with issues.

[REDACTED]

 [REDACTED]
Director
Airspace4All Ltd

[REDACTED]

Sent: 18 June 2020 15:11

[REDACTED]

Subject: RE: 20200616-RAF Little Rissington ACP

Hi [REDACTED],

Thanks for the continuing responses. I have now spoken to the CAA Desk Officer who has explained the process. The ACP Portal is designed for more complex airspace and Level 1 changes, which require comment through the citizen portal. As ATZs are Level 2c changes, they don't have to go through the design stages and can go straight to engagement, ie there is no airspace design with levels of Class D etc. However, when the design stage is bypassed it also bypasses Stage 3 and goes to the submission stage (4). So from the portal side, it looks like a sponsor has bypassed the engagement stage, when that is not the case. I therefore uploaded my redacted document to Stage 4b, but knowing that the Oxford RAUWG are important stakeholders, I decided to email separately to ensure all members received a personal copy from me (unredacted) and outside of the portal. There is a statement which the CAA is going to add to the portal to highlight that Level 2c changes won't appear at step 3, but will instead follow a different policy, but that update and statement won't be live on the portal until mid-July. In our case, and as I have previously

highlighted, the ATZ policy and submission form details all the comments received, which forms the submission to the CAA. Individual comments should go to SYE-LR-ACP@mod.gov.uk, so that they are separated and not lost in other email traffic.

As far as I am concerned the engagement process started on Tues 16 Jun and will run for 12 weeks with a closing date of 7 Sep 20. Nothing will be submitted (iaw the SARG Policy Statement) until after that date, so we are following closely the CAP 1616 process.

Thank you for the links you have sent; if you wouldn't mind sending over the kmz file for Google Earth that would be fantastic.

The safety data we have used was taken from the MOD Air Safety Management Information System (ASIMS), which is based on submitted Defence Air Safety Occurrence Reports (DASOR). I have attached an extract that my safety team used for trending and analysis, but there are some caveats:

- As this is MOD Copyrighted Information, please do not share this outside the three of us.
- Some of the incidents are considered more of a hazard/observation, ie all of our aircraft were on the ground at the time; however, if it was a minute or so earlier, or later, it could have been a different story. The event we have to consider is a **loss of safe separation**, which is one of our top risks/events. Therefore these haz/obs can easily be realised into a further event, such as Airprox or MAC.
- Not all events have been recorded by DASOR and the VGS have tended to focus on the more serious ones due to workload and the fact there is nothing they can do about it, apart from stop operating. I was at LR one Saturday and saw at least 4 direct overflights (and at low heights) in the morning, even though the VGS only reported one. Analysis after the event shows that these users are often not talking to anyone; however, the establishment of an ATZ, would have the outcome whereby users either avoid directly over flying less than 2000ft AAL, or talk to us to get relevant traffic and airfield information, which will improve SA on both sides.

As a military user we have a Duty Holder chain for Risk to Life (RtL) concerns. Bearing in mind we fly Air Cadets, where the societal risk of death of a cadet is held by the Secretary of State for Defence, we are mandated to reduce RtL to As Low As Reasonably Practicable (ALARP) (apologies if you already know the term) and Tolerable. Introducing some kind of airspace around LR would reduce RtL further and could therefore be deemed ALARP. The Duty Holder chain agrees that this is a suitable request to reduce that RtL.

As military we are under greater scrutiny from the public and press, than someone operating as a GA user. We always have to consider the "daily mail" test, in that if the absolute worst case happened, eg the death of an Air Cadet, the press will be deep diving into our processes as a Government organisation, and will be asking what we did to reduce the risk; an ATZ is a simple way of doing that. We have done all of the other things you would normally do over the years, such as producing posters, and writing to local airfields, but again, it is not capturing those within the GA community that operate their own aircraft from private strips or where there is no club; these are often the ones that don't want to talk to us. I had a "funny" incident once at RAF Syerston whereby a helicopter infringed the circuit. When we traced after the event (to see if there were any lessons learnt), the pilot told us he was monitoring our frequency, but couldn't hear us as he was listening to music on his iPod!!

I hope that goes some way to try and explain our rationale and why we consider this a safe option. An ATZ is only a small area, and bear in mind it will only be active at weekends and Bank Holidays, thereby having no impact the majority of the week.

Regards



Wing Commander [REDACTED] 2 FTS OC Ops Wg (Senior Operator, Aerodrome Operator & Regulation)
2 Flying Training School, RAF Syerston, Newark NG23 5NN

Sent: 18 June 2020 10:08

Subject: RE: 20200616-RAF Little Rissington ACP

Thanks [REDACTED],

The mists are clearing now. So I understand you are commencing the consultation now but because of the way the CAA is sequencing this, we cannot use the ACP portal to record inputs and it does not tell us this is going on. I think you may need to formalise your engagement and tell participants what the window for input is, given that it is not iaw the usual.

2 things that may be useful to you are:

Our analysis of collision risks published on our website at <https://airspace4all.org/reports/mac-evidence-based-analysis-of-risk-1975-2018/> particularly risks to gliders (which are overwhelmingly other gliders)

And our VFR Significant Areas (VSA) document which sets out the operations and operators in areas of Class G <http://fasvig.org/reports/mas-1-vfr-significant-areas> This is being widely used by UAS operators as a means to find out what happens in Class G and who they might contact.

Since then we have also produced a Google Earth based depiction of elements of GA traffic over a year. It shows glider and hang glider traffic flows and densities and is overlaid with the VSAs and the collision events which are interactive for inspection of details. We have been working on adding GA aeroplane data but that is not there yet. If you want that I can send you the kmz file which needs to be opened in Google Earth.

For our part, when a sponsor uses safety events as the basis for a proposal it is our practise to ask for details of these so they can be considered in the context of other operations. Is the safety event data available please?



[REDACTED]
Director
Airspace4All Ltd

Sent: 18 June 2020 08:55

To: [REDACTED]

[REDACTED]

Subject: RE: 20200616-RAF Little Rissington ACP

[REDACTED],

Thank you for your comments.

Unfortunately, I did not move the ACP to its current stage (I only moved it to the Define Gateway); the CAA have actually moved it to its current stage rather than myself. When I asked the CAA why this has happened they explained it was one of the challenges with Level 2c changes (which an ATZ request is). Please rest assured that the engagement will remain open until 7 Sep (as per my letter) and there will be no formal submission to the CAA until after this point.

I am not sure if you have taken a look at the SARG policy statement contained with my document in the footnotes on Page 4:

[CAA SARG Policy Statement – ATZ](#)

But if you look at Appendix 1 of Annex A, there is an example of the submission request to the CAA. If you take a look at Stage 3, there is a section for me to complete, listing either Nil comment or objections received. This is where I will add comments such as yours and others I have received, but is also why I have been asking some individuals which airport/airfield they represent, so their comments are recorded accurately.

These reasons are why I wanted to email each RAUWG member directly, rather than just rely on the ACP portal. I hope that provides sufficient assurance that the correct CAP 1616 processes are being followed.

To answer your concerns about the radar service, I completely understand the comments, and actually you are completely right. We have an LOA with BZN who will endeavour to tell users we are active, depending on their workload. This will not give an exact picture at that exact time; however, communication direct with LR would. However, our issues are those that don't talk via RT to anyone. 95% of our safety incidents were where the user wasn't receiving any service (which of course you are permitted to do in Class G airspace) and this has led to overflight of LR at low heights where aircraft have come into conflict with each other, either whilst on launch or in the circuit. So we are simply trying to increase situational awareness for all

users and provide airfield and traffic information, if you want to fly directly over the top of us (and at 500ft AGL which some do).

Any comments and objections can be emailed direct to me, or SYE-LR-ACP@mod.gov.uk, and I will ensure they are included in the ACP submission.

Please don't hesitate to contact me if you would like any further information.

Regards

[Redacted]

[Redacted]



Wing Commander [Redacted] 2 FTS OC Ops Wg (Senior Operator, Aerodrome Operator & Regulation)|
2 Flying Training School, RAF Syerston, Newark NG23 5NN|

[Redacted]

From: [Redacted]

Sent: 18 June 2020 07:30

[Redacted]

[REDACTED]

Dear [REDACTED],

Thanks for telling us about this ACP. Unfortunately we cannot provide the feedback you asked for via the ACP Portal as you have already passed the engagement steps in the process so the system will not allow it. The portal tells us you completed development of the options, the consultation and the subsequent appraisal of responses, all on 10 June! You are now preparing your formal proposal submission in Stage 4b so there is no mechanism in the ACP portal for further input from anyone. You have already decided so your email and the 2FTS letter of 16 Jun serves no purpose in the process.

Had you actually consulted us we would have pointed out that safety of all airspace users in this area is greatly enhanced by the radar services provided by Brize Norton to transit traffic and your proposal would deny that service. Instead, traffic would have to be on your AGS frequency which can provide no useful safety service apart from saying you are active which Brize Norton already does. There are many more issues to be considered but there is now no opportunity to air them; the only option that appears to be available to us is to make formal complaints to the CAA about failure to comply with the process.

Regards,

[REDACTED]



[REDACTED]

Director
Airspace4All Ltd

[REDACTED]

From: [REDACTED]

Sent: 16 June 2020 17:47

To: [REDACTED]

[REDACTED]

Subject: 20200616-RAF Little Rissington ACP

Dear all,

Apologies for the cold email, but I wanted to contact each of the Oxford RAUWG members directly as key stakeholders in the area.

For those of you that don't know me, please allow me to introduce myself as the Aerodrome Operator for RAF Little Rissington (LR). As you will probably remember from previous RAUWGs, we (at 2 FTS) have had an intention to improve safety at LR for some time. One area that concerns our Duty Holder is the type of airspace surrounding LR; therefore, last year we opened a discussion with the CAA with a view to allocating a more formal airspace structure. These discussions have led to an Airspace Change Proposal (ACP), which is now live and open for consultation/engagement. The attached document has been uploaded to the CAA ACP portal (under ACP-2019-045), but I wanted to send a personal (unredacted) copy to each RAUWG member.

We are therefore scoping stakeholder feedback for the establishment of an ATZ at LR, and I would be grateful for any comments via the ACP Portal.

Regards

[REDACTED]

[REDACTED]



Wing Commander [REDACTED] 2 FTS OC Ops Wg (Senior Operator, Aerodrome Operator & Regulation)
2 Flying Training School, RAF Syerston, Newark NG23 5NN

[REDACTED]