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By email

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RAF LITTLE RISSINGTON ACP ENGAGEMENT LETTER - BRITISH GLIDING ASSOCIATION RESPONSE

Thanks for your letter dated 16th June 2020 regarding ACP-2019-045 proposing an ATZ around Little Rissington airfield.

We understand that the airfield is used for ACO gliding training using up to five winch launched sailplanes, and that the gliding activity primarily takes place on weekends. We understand that the gliding operation at that airfield does not require air traffic control intervention. The proposal describes midweek military flying activity which we understand is highlighted by NOTAM. There is no quantitatively analysed risk data within the proposal.

We recognise that the military has a difficulty in that its duty holder system results in personal liability for risks, that duty holders strive for risk to be as low as reasonably possible and that sometimes results in difficult and costly proposals which are ultimately found to be disproportionate.

We understand that where an ATZ is established it is done so to protect the traffic operating within it.

Data supplied by Airspace 4 All in support of CAA airspace safety activity identifies that the greatest MAC risk to sailplanes are other sailplanes. As known by the ACO, FLARM can support effective lookout in mitigating a one on one MAC risk where both aircraft are equipped.

The BGA does not have access to DASOR information. Presumably, if in the opinion of an ACO pilot from Little Rissington the distance between aircraft as well as their relative positions and speed have been such that the safety of the aircraft involved may have been compromised, that incident would be reported as an airprox.

We have considered what we believe to be the two airprox identified as a safety justification for the proposed ATZ. One airprox occurred outside the area that would be bounded by the

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proposed ATZ. In that case, we note that the non-ACO aircraft involved was communicating to RAF Brize Norton and that the UKAB reported:

Notwithstanding questions regarding use of unverified data, members noted that a FLARM display would have indicated the presence of the Viking and that in the Board's opinion this potentially life-saving mitigation should be considered for use by Brize Norton Air Traffic Control given the frequency of glider flights in and around the Cotswolds. The Board noted that such an arrangement already exists at RAF Leeming.

The second airprox resulted in the following comment from the UKAB:

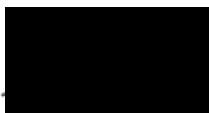
The Board quickly agreed that the Viking pilot was concerned by the proximity of the C182. In assessing the risk, with about 700ft separation, the Board assessed that there had been no risk of collision. Notwithstanding, a brief discussion followed as to whether or not safety had been degraded given the incident's proximity to the glider site. In the end, by a small majority, the Board decided that the geometry and separation of the two aircraft was such that normal safety standards had pertained, Category E.

Narrowed volumes of class G airspace around controlled airspace are described as choke points because they have the effect of funneling aircraft closer together than otherwise would have been the case. The Brize Norton CTR results in GA transit traffic that cannot or chooses not to cross the CTR flying around a sizeable volume of restricted airspace. An ATZ around Little Rissington would result in further limitations resulting in aircraft either transiting to the north of that airfield or through a narrow volume of class G airspace – a choke point - between Little Rissington and Brize Norton. Funneling aircraft to the south of the proposed ATZ presumably increases the risk of an infringement of the northern boundary of the Brize Norton CTR.

The BGA opposes the proposal to establish an ATZ at RAF Little Rissington. The proposal does not include a justifiable safety case and does not address impacts to stakeholders operating outside the proposed ATZ, including exportation of risk and reduction in utility of existing class G airspace.

In response to engagement with Cambridge airport, the BGA agreed to implement a self-regulated radio zone around that airport and its instrument approach procedures. That initiative has been highly successful. Noting that the greatest MAC risk to gliders are other gliders and that ACO gliders are FLARM equipped, the BGA would be willing to establish a self-regulated FLARM conspicuity zone around Little Rissington.

Yours sincerely


Chief Executive Officer
