

[REDACTED]

From: SYE-LR-ACP (MULTIUSER)
Sent: 09 September 2020 12:24
To: [REDACTED]
Subject: FW: Little Rissington ACP Consultation ACP-2019-045

Good morning Mr [REDACTED],

Thank you for your email and I apologise in the delay of replying. I am the Aerodrome Operator for RAF Little Rissington, along with several others, and am the sponsor of this particular ACP so will try and answer your questions and concerns.

As per the ACP, the engagement was open until 7 Sep and I will ensure your comments and objection are included within our final submission to the CAA, as part of the engagement process.

If I may be so humble as to try and answer and respond to your comments below:

- We have followed the CAP 1616 in consultation with both the CAA and Defence Airspace and Air Traffic Management (DAATM) and their guidance. Since an ATZ is a Level 2c change, there is no design or options stage as such and the portal moves straight to engagement, with feedback requested to this email address as you have done. The engagement stage started on 15 Jun to allow 12 weeks engagement and feedback.
- I note that Lasham is 48NM from LR (if you go direct rather than having to route round RAF Brize Norton), so I completely appreciate you may use the area around LR, but I am sure you will appreciate it is extremely difficult to notify every airfield that may use the airspace. As you will be aware, an ATZ, if agreed would have a radius of 2NM, so that would still leave 44NM distance between the edge of the LR ATZ and the Lasham Gliding Site boundary.
- I presented this ACP to the Oxford Regional Airspace Users Group on 30 Jun 20. To me this is the appropriate forum to highlight to all other local airfields and airspace users, so I would therefore humbly argue that this is not a last minute notification and the ACP has been live for some time (since 15 Jun). I would also offer that we have communicated directly with local flying clubs and schools; I take it therefore that Lasham doesn't attend the Oxford or any other RAUWG?
- I completely agree with your comments regarding the AGCS. As you will be aware we are only requesting an ATZ at weekends and Public Holidays (plus a few week courses by NOTAM). At all other times the ATZ will not be active and will still be available for use without any RT contact. The AGCS operator (when the ATZ is active) is only there to provide information to any passing traffic and to facilitate safe crossing of the ATZ. The AGCS operator cannot and will not refuse access to the ATZ. You may wish to know that I am also a CAA ROCC examiner, so I have cross pollinated the CAP 413, CAP 452 training and examinations into the military domain, to ensure we demonstrate at least civil equivalence or better. I am therefore completely in agreement with what a AGCS can and cannot do. I do have to emphasise that this ACP is all about improving communication and situational awareness for everyone. The majority of incidents we see are GA traffic not communicating via RT to anyone and flying directly over at heights such as 1000ft AGL, which as I am sure you will appreciate with your expertise as a glider pilot/instructor introduces a likelihood of contact with cables. Our principle around this ACP is that if users call on the ATZ frequency, we know where they are and their intentions, they know what we are doing, and we can improve safety for all users in the ATZ. I have frequently highlighted to the BGA that LR is available to the gliding community for anyone getting

caught out during cross-country tasks, as I would rather you land at a serviceable airfield, rather than an unknown farmers field.

- Each site has to be taken on its own issues. 2 FTS does not have this level of incidents at any other site and I am not looking to set a precedence, as my focus is purely on LR for this ACP. You may wish to know that three other 2 FTS sites do however operate within an ATZ. RAF Topcliffe, for example, is another one of my responsibilities; 2 FTS is the primary activity and I do have an ATZ active at weekends and Public Holidays.
- We have been working closely with Brize on both of our ACPs. We already have a LoA in place which has been in use for several years, and have drafted another one to support both of our ACPs.
- I note your public objection and will include your email as part of my submission to the CAA; however, I hope I have explained the fact that is not a last minute engagement attempt and we (2 FTS) feel from the Duty Holder perspective that there is a sufficient Risk to Life to both our operations and the GA community, for us to request an ATZ as part of our mitigations, to reduce that Risk to Life.

Regards



Wing Commander [REDACTED] 2 FTS OC Ops Wg (Senior Operator, Aerodrome Operator & Regulation)
Aerodrome Operator for RAF Kenley, RAF Kirknewton, RAF Little Rissington, RAF Syerston, RAF Topcliffe & AO Desig
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From: [REDACTED]
Sent: 03 September 2020 10:28
To: SYE-LR-ACP (MULTIUSER) <SYE-LR-ACP@mod.gov.uk>
Cc: [REDACTED]
Subject: Little Rissington ACP Consultation ACP-2019-045

FAO: Airspace Policy/2FTS Officer Commanding Operations Wing

Dear Sir or Madam

Subject: Little Rissington ATZ ACP

I have been made aware via a public forum of the following ACP for which consultation has not been widely publicised to all stakeholders despite the fact the ACP may impact a high proportion of aircraft in the vicinity of Little Rissington (LR).

CAP1616 clearly states that *"Where a change may impact on General Aviation's access to airspace, the change sponsor may need to communicate directly with local flying clubs and schools, as well as with the national bodies representing these types of activity."*

As of yet large airspace users to the south of the Brize Norton Control Zone who utilise the area near LR have not had formal notification of this and finding out via public forum at the last minute is unacceptable, it is believed the sponsor may have used NATMAC as an attempt to notify relevant parties, but I do not believe this to be satisfactory and in line with CAP1616s policy of wider engagement. All local stakeholders want to help increase safety and reduce DASORs or Airprox occurrences but without wide consultation the

sponsor's aim of improving safety for its operation at LR will not be met and there will be no further increase of awareness of LR's operations which will obviously be still continuing outside of the ATZ, a number of flying schools south of Brize Norton regularly route towards Enstone and between Cirencester and Northampton making this a busy piece of airspace, potentially made even worse if Brize ACP is approved.

From my professional experience as a Duty Aerodrome Operator, Sailplane Flight Instructor and Examiner operating in this region of the country frequently, it is unprecedented for a winch launch glider site to gain an ATZ for just Gliding especially at LR has so few movements per annum compared to most nearby gliding operations, a precedent must not be set by 2FTS that this becomes the norm for VGS sites due to congested airspace for example, near 615VGS at Kenley, on the contrary the regulator must be prepared if this precedent is set for potentially more ATZ ACPs from the civilian world if LR's safety case for a small gliding operation is justified. The general aviation community realises the need for safety at glider winch sites and the many options that can be afforded to mitigate such risk, with the option chosen the sponsor must expect and prepare if approved the MAGCS operators to receive high levels of workload especially in the summer from Civilian Gliders and GA traffic that have little option but choose routes through this area. It must be reminded that the MAGCS operator does not have the authority to issue or refuse clearance into an ATZ within the bounds of MAGCS, any issues on access to the ATZ from stakeholders when requested will be formally logged via the regulator MOR/FCS1521 paperwork and the MAGCS operator would be expected to note this also.

The Presentation Dated 27th April 2020 indicates that "Integration with the RAF Brize Norton ACP" would be established as part of this ACP, as of yet there are no public documents to make any further comment on this and later the consultation document states "Acknowledgement of additional ACPs, i.e. Brize Norton and Oxford." No Draft LoAs are produced, neither any traffic flow studies or publicly visible minutes between Brize and LR discussing the LR ATZ ACP.

This is not satisfactory information from 2FTS and is woefully inadequate to meet the standards of a CAP1616 proposal and for the reason above I must **publicly object** currently to this ACP going any further forwards in the CAP1616 process until the sponsor provides the regulator and stakeholders with more detailed impacts and a more public consultation, 2FTS must provide public documents for consultation such as Draft LoAs on the likely impacts with or without the Brize ACP which may come into force from 2021 if approved, Kemble's GNSS approaches currently being reviewed have had the same level of scrutiny and 2FTS should be afforded no different. This is in 2FTS's own interest as the general aviation traffic spread will likely change as a result of the Brize ACP and the safety case provided by 2FTS may need to be changed to focus on specific choke points that may further decrease safety for LR Air Systems as a result of Brize ACP being approved.

I'd like to put on record that if further consultation and discussion is done properly by the sponsor that there would likely be more support from stakeholders like myself for this ACP.

Regards



FI (S)/BGA FE

- 1) 2FTS- Sponsor
- 2) Airspace-CAA SARG
- 3) Airspace Policy- CAP1616