From:	
Sent:	18 June 2020 17:10
То:	
Cc:	
Subject:	RE: 20200618-Little Rissington ATZ Proposal Feedback

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Thanks for your comments – useful as always. Hopefully some of my comments below (in red) will help to articulate my thought process.

Regards

OROYAL 2FTS AIRFORCE 2FTS 2 Flying Training School
Wing Commander 2 FTS OC Ops Wg (Senior Operator, Aerodrome Operator & Regulation) 2 Flying Training School, RAF Syerston, Newark NG23 5NN
From:
Sent: 18 June 2020 10:23
To: Cc:

Subject: 20200618-Little Rissington ATZ Proposal Feedback

Sir

Thank you for sight of the attached Little Rissington ATZ proposal and the opportunity to provide comment. My comments are as below, in capacity as Head of Training/Flight Examiner RAF Brize Norton Flying Club and the RAUWG rep for 6 Air Experience Flight/Oxford UAS RAF Benson. I do not formally represent RAF Brize Norton who provide their RAUWG representation through SATCO.

# Requirement

The statement of need refers to mid-week use by the RAF Parachute Training School, Airborne Delivery Wing, Joint Helicopter Command and Tactical Air Traffic Control. All of these activities are generally currently promulgated by NOTAM which I believe is effective. The airspace NOTAM size for these is normally bigger/different to an ATZ so it is unclear what protective effect an ATZ would have and they are still likely to still require NOTAMs in addition to an ATZ activation. The ATZ will only be for VGS activity, ie weekends and Public Holidays and nothing else. The reason we have "by NOTAM" in there is if the VGS do a week's continuous course during school holidays, then we just activate the ATZ for that week.

## **AEF/UAS Tutor Operations**

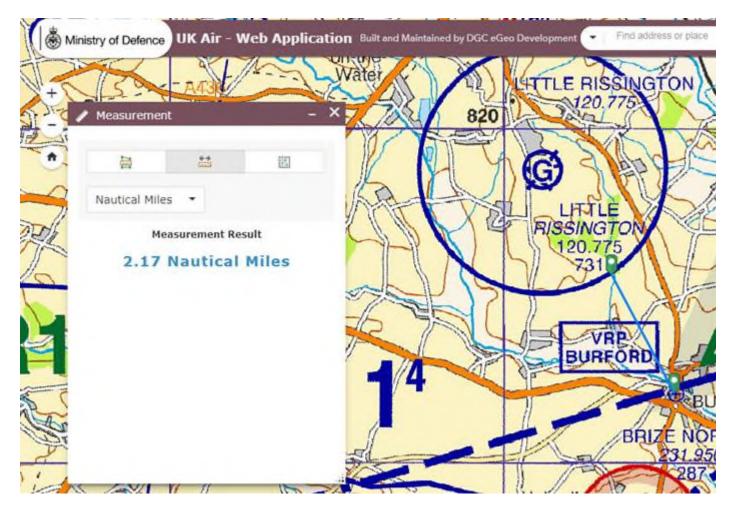
6 AEF Tutors would rarely operate to the North of Brize Zone due to the transit time and limited sortie duration of AEF flights. UAS and AEF/UAS SCT flights may utilise the area to North of Brize for training to seek clear airspace away from the congested 'Vale' area to the South of Brize, but these flights are generally weekdays when your ATZ would not be active. In the event of ATZ activation and Tutors operating in the Brize North area, Tutors would be working Brize freqs and are likely to be significantly higher than 2000' AAL for GH.

### Integration with Brize Zone

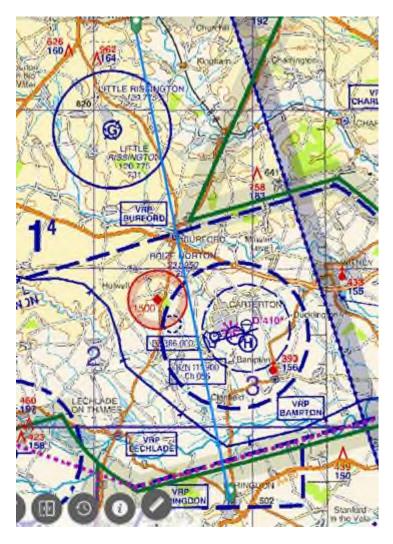
The Standard VFR departure and recovery from Brize to the North routes via Burford VRP, and many VFR Brize transits will route a Burford VRP – Faringdon VRP lineage. Aircraft on these profiles will have to be working Zone 119.000 and will not have time or spacing to work a Little Riss ATZ freq as well. This will either cause a significant risk of late calls to either Little Riss and/or Brize Zone, or infringement of the proposed ATZ as aircraft struggle to call and manoeuvre around the ATZ to/from Burford VRP.

I believe most of the current Little Riss overflying traffic is routing East-West and not working a Brize freq. Those that are working Brize currently receive timely information from Brize Zone or LARS. While seeking to induce two way RT with overflying traffic, I am concerned an ATZ with a separate freq to Brize will create new infringement possibilities and RT freq changes for North – South bound traffic.

We already have an LOA with BZN to make users aware of activity at LR when they have the capacity to do so. The Burford VRP is 2.17 NM away from what would be the edge of the LR ATZ.



I completely take your point about the Farringdon to Burford VRP line, as if followed this would route straight through the ATZ. I agree there is not enough time to change frequency and make adequate contact, but if that was me flying between the two, I would take a slight detour to the East to fly round the ATZ (it would require a 10 degree correction to the right iot avoid the ATZ, once leaving the Brize CTZ). I will however highlight this as a concern raised by you during the engagement.



### **Hours of Watch**

In response to ATZ infringements and prosecutions the CAA have recently confirmed that (<u>www.airspacesafety.com</u>):

If there is no flight information centre at the aerodrome the commander must obtain information from the air/ground communication service (AGCS) unit to enable the flight to be conducted safely within the ATZ (Rule 11, para 4)

In effect this means that two way comms must be obtained with the AGCS to transit. If the VGS units are to provide the MAGCS - will this be provided throughout the weekend activation? If just limited to when VGS units are actually on the field and flying it could effectively close the airspace for long periods as nil RT return means pilots have to remain clear.

As a MAGCS cannot issue clearances, I am also unclear on how access to the airspace would actually be facilitated by obtaining two-way RT with the MAGCS.

Yes absolutely – VGS will provide a MAGCS during the hours of watch and if not flying due to weather, will inform BZN and will monitor the freq from the HQ. You are correct in the application of Rule 11. A MAGCS cannot issue clearances, but Rule 11 allows for this and providing the pilot has established two-way communication and obtained airfield and traffic information, then they can enter the ATZ, but the responsibility to conduct the flight safely in the

ATZ is the pilots responsibility. But the whole point I keep stressing is that, this is all about communication and getting people talking to us. If someone wants to route through the ATZ we cannot/will not stop them, but they will know what we are doing, which runway we are on, which circuit direction is being used and where our traffic is. More importantly, everyone on freq and our aircraft/Duty Authoriser will know where they are, what height they are at and what they are doing, so surely that improvement of SA is to everyone's benefit.

#### Recommendations

- Further consideration is given to the RMZ option. A small RMZ sector to the North of Brize, with a Brize freq pairing, would negate frequency changes for traffic in the area and would ensure all traffic transiting close to Little Riss get the desired info on activity. Interestingly in the pre-ACP discussions we suggested an RMZ as a possibility, but the CAA highlighted an ATZ was more appropriate. Not sure if they have wider awareness of what might happen in the future (future skies etc).
- Consideration is given to the use of a Danger Area with a fully operational DACS or DAAIS, ideally provided by the Brize freq, to protect the military and gliding activity. I don't think BZN would have the capacity to do this, but there would be a disconnect between BZN and the VGS as there are no point to point services. Another interesting fact for you is that we have highlighted to the MAA that there are lots of "personnel" including DZDOs etc in Defence that also speak to aircraft and need to also use a MAGCS. The BLUF is that the MAGCS is being progressed to a Tri-Service Defence course rather than just 2 FTS.
- 2 FTS may also wish to consider fitment of transponder or portable ADS-B devices to the Vikings to mitigate glider airprox risk. <a href="https://uavionix.com/products/skyecho/">https://uavionix.com/products/skyecho/</a> SkyEcho2 is carried by RAFBZN Flying Club aircraft, just suction mounts to canopy, lasts all day on internal charge and provides excellent ADS-B out Electronic Conspicuity. Another good point. I have previously highlighted to our DT that we wish to use Sky Echos (Biggin Hill are going to let us have some to trial at Kenley if their ACP is approved), but even as carry on kit, they still need a PED assessment which has to go through the DT and prioritised within their current workflow (we are still waiting for 8.33 to be put in long story, but need T&E from 206 Sqn etc etc for RTSA approval). Ultimately we want all aircraft in 2 FTS, to have FLARM (which they already have) and a Sky Echo.

All the best,

 Squadron Leader
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