



DAP1916 - Statement of Need

Tracking Code: **F9WM6V**

CHANGE

1. Category of Airspace Change

Does your proposal concern Changes to Notified Airspace Design or Planned and Permanent Redistribution of Air Traffic? *

- ☒ Changes to Notified Airspace Design ☐ Planned and Permanent Redistribution of Air Traffic

2. Title of proposal

Please enter a title for this intended change, (max 80 characters): *

Denham - change to height of Local Flying Area

☐ Have you previously submitted a Statement of Need ?

SPONSOR

3. Change Sponsor Details

Please select the appropriate category and complete. *

- ☒ A Company
☐ An Unincorporated Association or other body
☐ Individual (including sole traders and partnerships)

3a. A Company

Registered Company name (in full) *

Bickerton's Aerodromes Ltd

Registered Company Number

00346189

Country of Company Registration

UK

Registered Office Address

Denham Aerodrome, Tilehouse Lane, Denham, Uxbridge

Postcode

UB9 5DF

E-mail

██████@egld.com

Trading name (if applicable)

Denham Aerodrome

Trading Address (primary site)

Owl's Oak, Slade Oak Lane, Denham, Uxbridge

Country

UK

Postcode

UB9 5DN

Website address

www.egld.com

Primary Point of Contact Name *

██████

☐ Requires Airspace Portal Access ?

Telephone *

[REDACTED]

Email *

[REDACTED]@egld.com

Additional Contacts

You can add up to 4 additional contacts

STATEMENT OF NEED

4. Independent Aviation/Airspace Consultancy

☒ Is an Independent Aviation/Airspace Consultancy involved in this proposal?

Aviation Consultancy

Registered Company name (in full) *

Merlin Aerospace Consulting Ltd

Registered Company Number

10028049

Country of Company Registration

UK

Registered Office Address

[REDACTED]

Postcode

BN8 [REDACTED]N

Telephone

01825 7[REDACTED]

Email

[REDACTED]

Trading Name (if applicable)

as above

Trading Address (primary site)

as above

Country

Postcode

Website address

n/a

Primary Point of Contact Name *

[REDACTED]

Primary Contact

☒ Should the CAA use the Independent Consultancy as the primary point of contact for this airspace change proposal?

☒ Requires Airspace Portal Access ?

Telephone *

[REDACTED]

Mobile Number (for Airspace Portal) *

[REDACTED]

Email *

[REDACTED]

Additional Contacts

You can add up to 4 additional contacts

5. Statement of Need

Please provide a brief 'Statement of Need' clearly explaining what issue or opportunity this proposal is seeking to address.

*Further information can be found in CAP1616 **

Introduction

There have been continuous aviation activities on land now known as Denham Aerodrome since Myles Bickerton acquired it in February 1934. The family are still the owners and operators of this CAA Licensed Aerodrome. It is today a busy General Aviation aerodrome recovering like many others from the effects of the COVID-19 pandemic. Traffic movements are similar to pre-pandemic levels.

The current /existing situation

The Denham ATZ is a circle radius 2nm and has a vertical extent of 2249' amsl (2000' agl). It sits partially within the northern boundary of the London CTR (D) zone (SFC 2500) A Local Flying Area (LFA) has been established as described in the Denham AIP entry EGLD AD 2.22 Flight Procedures Para 5 LFA.

The published circuit altitude is 1000' amsl (750' aal) which is the same altitude as the top of the LFA also 1000' amsl. An LoA with RAF Northolt states that aircraft within the Denham Local Flying Area are deemed to be flying in accordance with a clearance i.e. "Aircraft flying below the minima required for VFR flight and within the London CTR Local Flying Areas (LFA) notified for Brooklands, Denham, Fair Oaks and White Waltham, will be considered as Special VFR flights and compliance with the procedures published for the relevant airspace will be accepted as compliance with SVFR clearance." This takes account of changes to CAA CAP493 SI 07/2020 - VMC visibility and distance from cloud in Class D airspace that came into force on 20th May 2021. Similar wording was included in the AIP dating back to when the LCTR airspace was class A.

The published circuit for Denham runway 06/24 routes traffic to the north of the field righthand on 24 and left hand on 06.

There is also an avoid for Denham traffic to the south of the A40 Oxford Road agreed with RAF Northolt.

Issues/opportunities to be addressed

Denham operations have coexisted with RAF Northolt's for very many years. A Letter of Agreement covers day to day operations.

Likewise, relationships with London Heathrow Airport continue to be good with work on a mutually agreed Statement of Common Ground not finalised only because of the hiatus caused by the pandemic. An LoA with them is due for review at the moment.

When available radar services from Northolt Radar or London Control have for many years helped position inbound IFR traffic through complex airspace either to final approach or by descent into Class G airspace for own navigation into the circuit.

However, from 6th September 2021 there has been an unannounced change of policy initiated by NATS En-route the upshot of which saw a large number of MORs created over the first weekend, Saturday 11th and Sunday 12th September 2021. It became apparent that controllers now initiate infringement procedures for aircraft in the Denham LFA should their transponder readout go above 1100'.

The LoA between Denham and Northolt recognises that aircraft deviate around a circuit altitude and states: "Aircraft flown at the maximum circuit altitude 1,000ft AMSL (750ft AAL) will experience normal deviation. As a result, the controlled airspace infringement tool (cAIT) at Northolt Radar will be set to activate should an aircraft indicate 1200ft, or above (based on the London QNH). Northolt Radar will notify such flights to the Denham AGCS Operator, who shall in turn inform the pilot."

The 1000' circuit altitude is not imposed by NATS, the use of the airspace in the Denham ATZ is by agreement between Denham and RAF Northolt. The unannounced introduction by NATS of a policy of filing MORs if an aircraft deviates from the circuit altitude was not agreed by Northolt or Denham and it does not appear to be based on a demonstrable/measurable safety risk.

The cause of the issue or opportunity and any associated factors or requirements (safety, operational, technical and environmental)

The cause of the issue was the unannounced change in infringement policy taken by NATS TC.

The long-term action to remediate this is to raise the height of the LFA to 1200' meaning an aircraft would have to report above 1300' to trigger cAIT.

The published procedures would continue unchanged, i.e. circuit altitude 1000' amsl.

6. Administrative Changes

☐ Does your proposal represent an administrative change to the Aeronautical Information Publication (Proposed Level 0 change)?

7. Instrument Flight Procedures

☐ Does your proposal have the potential to include a change to and/or new IFPs?

8. Five-Letter Name Codes (5LNC)

☐ Does this request solely concern the reservation of new Five-Letter Name Codes (5LNC) in advance of a future proposal?

9. Additional Information

Please use the box below to add any further information which the CAA should be aware of when considering this submission (for example dependencies on other airspace change proposals and/or funding deadlines):

SUBMISSION INSTRUCTIONS

Submission

Date and Time: 22 Nov 2021 12:42:56 PM

Your form has been successfully submitted. Please keep a copy of this acknowledgement for your records.

Application
Submission
Number: DAP1916V2-296

Please note that the Airspace Regulation team will contact you to acknowledge receipt of your Statement of Need and to confirm the unique ACP reference number (ACP-YYYY-NNN) allocated to this submission. Following receipt of your unique ACP reference number, you will be required to create an associated airspace change proposal on the [CAA's Airspace Change Portal](#). Please refer to CAP 1706: CAA Airspace Change Portal Sponsor Training Manual provides for further information/guidance on how to use the Airspace Change Portal.

Once your submission has been assigned, arrangements will be made for you to attend an Assessment Meeting. One of the key outputs from this meeting will be an indicative timeline for the proposed airspace change. To enable the CAA to consider your proposed timescales, you will be expected to present dates for the following milestones at the Assessment Meeting:

- DEFINE Gateway
- DEVELOP & ASSESS Gateway
- CONSULT Gateway
- Formal Airspace Change Proposal Submission
- Target AIRAC

The CAA holds Gateway Assessment Meetings on a monthly basis and the annual schedule is published on the [CAA website](#).

Finally, you should also note that from September 2018 any amendments submitted by a Data Originator or ANSP for onward promulgation in the UK IAIP will be subject to the Aeronautical Data Quality Requirements. See [Commission Regulation \(EU\) No 73/2010](#) (updated by 1029/2014) and [CAP 1054: Aeronautical Information Management](#) guidance material for further information. These requirements will be discussed in greater detail during the course of your initial meeting with the CAA.

When you have completed this form, click this button to submit the form for processing. Do not click this button more than once. You will then be provided with further instructions.