



Ministry  
of Defence

**ACP-2022-40**

**GATEWAY DOCUMENTATION:  
STAGE 1 – DEFINE**

**STEP 1B – DESIGN PRINCIPLES  
AND  
STAKEHOLDER ENGAGEMENT**

## Document Authorship and Approval

Action	Role	Date
Produce	Airspace Change Proposal Team	25 May 23
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# ROYAL AIR FORCE BRIZE NORTON AIRSPACE CHANGE PROPOSAL

## STAGE 1B

### DESIGN PRINCIPLES

#### Introduction

The Ministry of Defence (MoD) is the Change Sponsor for the Brize Norton (BZN) Airspace Change Proposal. This proposal intends to redesign the current controlled airspace to the appropriate volume to support RAF BZN's operations, release unrequired airspace and enable safe, efficient access for other air space users.

The purpose of this document is to provide evidence to the Civil Aviation Authority (CAA) that the Change Sponsor has followed the process laid out in CAP1616 and forms part of the overall requirements for the Stage 1- Define Gateway, Step 1B - Design Principles.

The Change Sponsor has engaged with a wide range of potential stakeholders and sought their views on the initial proposed Design Principles (DPs). The feedback received has been reviewed and summarised in this document in order to finalise the proposed DPs that will then be used in the development of the Design Options during Stage 2.

This document is laid out as follows:

**Section 1 – Stakeholder Engagement.** This section outlines how stakeholders were identified, the engagement methodology and a timeline.

**Section 2 – Design Principles Development.** This section describes the initial draft DP, summarises feedback and then proposes a final set of DPs.

**Section 3 – Next Steps.** Outline of the next steps in the ACP process.

**Annex A – GAA Meeting Minutes.**

**Annex B – Engagement Documentation.** Copies of the engagement letters and information documentation distributed to stakeholders, along with the accompanying email, have been included.

**Annex C – Regional Airspace Users Working Group (RAUWG) Meeting Minutes.**

**Annex D – Brize Norton Parish Council Meeting Minutes.**

**Annex E – Stakeholder Feedback Analysis.** This will highlight the rationale for accepting or rejecting feedback from stakeholders and includes additional feedback received at this stage.

**Annex F – Raw Stakeholder Feedback.** All stakeholder feedback that was received by the Sponsor.

## Executive Summary

The Change Sponsor conducted stakeholder analysis to ensure that all potential stakeholders were identified and given the opportunity for engagement during the DPs development. Stakeholders were engaged in writing, via a letter distributed by email, and included:

- Local Airspace Users
- Local Authority
- National Air Traffic Management Advisory Committee (NATMAC) members
- National Bodies

Engagement began on 14 Nov 22 with the General Aviation Alliance (GAA) and British Gliding Association (BGA) (meeting minutes Annex A) and then London Oxford Airport (LOA) (no minutes<sup>1</sup>) on 23 Jan 23; meetings were held with these stakeholders in order to help develop draft DPs. The BZN ACP intends to work closely with said stakeholders throughout the entire process; important engagement missed with the previous ACP. The finalised draft DPs were sent to all stakeholders on 01 Feb 23 with 3 months to reply.

There was a relatively low response rate at this stage and some feedback was deemed to fall outside of specific feedback on DPs. The overarching theme from stakeholders was concerns over the possibility of reducing airspace availability in what is already a very congested section of Class G and the transferring of MAC risk.

As a result of the engagement, 4 DPs were amended, 1 Design Principle (DP) removed, and no new DPs implemented.

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<sup>1</sup> No minutes were taken. The DP were a discussion point as part of an overall LOA visit. Feedback was a suggestion to add safety and integration of users; LOA were happy overall with the DP. They shared the DPs with colleagues and further feedback was sent via email, which can be found in the analysis of feedback and raw data.

## Section 1 – Stakeholder Engagement

### Stakeholder Identification

**Geographical Area.** The assumption was made that the proposed airspace change will be within 20nm of RAF BZN; it is acknowledged that it may still affect airspace users from across the wider region. For this reason, airspace stakeholders were selected from a geographical area within a 30-mile radius of the base, plus a few further afield, such as national bodies. The list was produced from previous engagements, contact details received from the CAA, and internet searches.

**Stakeholders.** The project team conducted a thorough assessment of all organisations and people with links to RAF BZN and identified numerous stakeholders in the geographical area, divided into the following groups:

**Local Airspace Users.** Individuals, local airfields, and flying groups.

**Local Authority.** Parish, Town, District and County councils were all included in the engagement. Contact details were taken from previous engagement, the list available on the Oxfordshire County Council website (<https://mycouncil.oxfordshire.gov.uk/mgParishCouncilDetails.aspx>) and online contact portals. Online Parish and Town Councils in Oxfordshire County received direct contact from the ACP team as they lie within the same County. There was an assumption that the other Counties would cascade information to representatives at an appropriate level as they saw fit.

**National Air Traffic Management Advisory Committee (NATMAC).** The CAA provided stakeholder contact details. There was an assumption that NATMAC organisations, as national over-arching bodies, would cascade information to representatives at an appropriate level as they saw fit, and this was requested in the written communication. This may have resulted in some stakeholders being contacted twice but reduced the likelihood of the Sponsor not engaging with relevant stakeholders that it may otherwise have inadvertently omitted.

#### ***General Aviation Alliance (GAA)***

The GA Alliance represents the interests of some 72,000 subscription paying members of a group of organisations in the UK General Aviation (GA) industry, including the British Balloon and Airship Club (BBAC), British Gliding Association (BGA), British Hang Gliding and Paragliding Association (BHPA), British Microlight Aircraft Association (BMAA), British Model Flying Association, British Skydiving, Helicopter Club of Great Britain (HCGB), Light Aircraft Association (LAA), PPL/IR Europe - European Association of Instrument Rated Private Pilots, and The Royal Aero Club. As a representative of a substantial number of GA members, it was assumed they would cascade information as they saw fit; this was requested in the written communication.

**National Aviation.**

A list of national over-arching bodies given by another MoD ACP team.

**National Bodies.** It was deemed important to engage with other organisations outside of the aviation and local authority spheres to ensure that all interests can be considered.

**Additions.** Several local stakeholders, who were informed of the engagement by another stakeholder contacted the ACP team directly and were added to the distribution list for future engagement. Where other potentially affected stakeholders are identified, they will also be included for all future engagement.

Local Airspace Users		
621 VGS	Draycott Aerodrome, Swindon	Rendcomb Airfield
Aeros	Enstone Airfield	██████████
Aircraft Differences Training	Enstone Flying Club	SATCO, Oxford/Kidlington Airfield
██████████ - GASCo	Finest Hour Experiences	Shilton Model Flying Group
Altitude Angel	Gloucestershire Airport	Shobdon Airfield
Aston Down	Gloucestershire ANSP	Skyborne
Babcock Mission Critical Services	Gloucestershire Helicopters	South Cerney para/handgliding
Banbury Gliding Club	Go Fly Oxford	Staverton Flying School
Bath Wilts and North Dorset Gliding Club	Gryphon Aero Club	Thames Valley Air Ambulance (Benson)
Benson Flying Club	HCGB	Turweston
BGA	HCGB & GAA	TV Hang Gliding Club
Bicester Airfield Management	Heli Air	TV Hangliding
Bicester Airfield Management	Heliflight (UK) Ltd	Vale of White Horse Gliding Centre
Bicester Gliding Club	HeliGroup	Voler Aviation Services
Bidford Gliding & Flying Club	Hinton and Turweston Representative	West Wales Airport
Booker Aviation	Hinton-in-the-Hedges	Wiltshire Air Ambulance
Bristol Aero Club	James Kenwright Helicopter Training	Wiltshire Microlight Centre, Calne
Bristol Airport	Kemble ANSP	██████████
Bucks Microlite club	Leading Edge Aviation	Charlton Park Airfield, Malmesbury
CAE Oxford	Ledbury Airfield	Chiltern Aerodrome
Caretaker SATCO GST	Lyneham Flying Club	CHIRP
Castle Air Academy	██████████	██████████
CEO BMAA - British Microlighting Ass.	Membury Airfield	Civil Aviation Authority
██████████	National Police Air Service (Benson)	████
Nympsfeild	Park	Oxford ANSP
Osprey CSL	Cotswold Airport	Oxford/Kidlington Airfield

National Aviation		
Airlines UK	British Airline Pilots' Association	British Microlight Aircraft Association
Aircraft Owners and Pilots Association	British Air Racing - Royal Aero Club Records Racing and Rally Association (RRRA)	British Model Flying Association
Airport Operators Association	British Balloon and Airship Club	British Skydiving
Airspace4All	British Business and General Aviation Association	DAA - Honorable Company of Air Pilots
Airspace Change Organising Group	British Gliding Association	Drone Major
British Microlight Aircraft Association	DAA - Honorable Company of Air Pilots	Guild of Air Traffic Control Officers
British Model Flying Association	Drone Major	Helicopter Club of Great Britain
British Skydiving	General Aviation Alliance	Light Aircraft Association
Aviation Environment Federation	British Hang Gliding and Paragliding Association	PPL/IR Europe
Association of Remotely Piloted Aircraft Systems UK	British Helicopter Association	UK Airprox Board
UK Flight Safety Committee	National Police Air Service	

Added after Initial Engagement	
Edgehill Gliding Centre Limited	Shrivenham Councillor
████████████████████	Oxford Gliding Club - WotG
████████████████████	

National Bodies	
Natural England	Environment Agency
Cotswold AONB	County Land and Business Association
Campaign to Protect Rural England	

NATMAC		
████████████████████	████████████████████	████████████████████
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<sup>2</sup> DAATM is responsible for coordinating pan-Defence input as required.



## **Engagement Methods**

### **Written Communication (Annex B)**

The primary method of engagement was written communication via email. An attached letter introduced the stakeholders to the ACP, whilst an attached information documentation explained the requirement for the ACP, the intent, BZN background, and outlined the draft DPs. It also provided details on how to provide feedback, either via Microsoft forms, a word document or email. A link to the CAA's Airspace Change Portal was provided in the letter. A copy of the engagement letter has been uploaded to the portal.

### **Verbal Presentation to the Oxfordshire RAUWG**

The Change Sponsor also delivered a face-to-face brief at the Oxfordshire Regional Airspace Users Working Group (RAUWG), held on 22 Mar 23. This provided an opportunity for in-person discussion with local airspace users and representatives from national aviation organisations on the requirement for airspace change at RAF BZN, activities undertaken so far and how the Change Sponsor plans to continue engagement through the next stage of the ACP process. There were no comments or questions from stakeholders at the time. Minutes can be found at annex C.

### **Meetings**

As stated in the executive summary, meetings were held prior to the release of the DPs with the CEO of GAA, BGA and LOA. In the letter and information document sent out to all stakeholders, the offer of a meeting was provided. Some individuals requested a face-to-face but once informed it was not currently the design of airspace, but DPs and the difference between the two was explained, many requested to leave the meeting until the release of the designs. However, a meeting was held with BZN Parish Council. Minutes can be found at annex D.

### **Feedback**

In the documentation sent out, stakeholders were asked to provide feedback in written communication via either Microsoft forms, a word document, email, or letter. However, it was also stated they could provide feedback in their preferred way. Feedback was analysed and responded to individually in a table (annex E) from the raw stakeholder feedback (annex F).

### **Methods Discounted**

Although meetings were offered, they were not proposed, as it was felt that there would be little value in holding wider briefing sessions (online or face-to-face) without having information to share about potential Design Options. It is anticipated that such briefings would be more beneficial during Stages 2 and 3 of the ACP.

### **Engagement Record Keeping**

When engagement was sent, returned, or unable to send, it was documented. All communication and feedback has been and will continue to be documented.

## Engagement Chronology

DPs were sent to stakeholders on 01 Feb 23 and feedback was requested to be received by 30 Apr 23. The extended period from release of DPs to deadline, was due to the timeline the MoD required for contract tendering. Throughout the engagement period, feedback was acknowledged by email and stakeholders that had been made aware of the ACP through NATMAC organisations or other means were added to the engagement matrix, to be included directly in future communications.

Date	Action	Remarks
16 Jun 22	Stage 1A documentation (SoN) published on the CAA ACP portal.	
01 Feb 23	Engagement letter and documentation emailed to stakeholders	Feedback requested by 30 Apr 23.
22 Mar 23	Presentation at the Oxfordshire Regional Airspace Users' Working Group2	Face-to-face brief at RAF BZN. Attended by local military representatives and civilians airspace users, national aviation organisations and the CAA.
30 Apr 23	Engagement period finished.	19 responses received

## Section 2

### Initial Draft Design Principles

The draft DPs initially presented for feedback were as follows:

Letter	Design Principles	Rationale
a	Provide a safe environment for all airspace users	Provide a safely designed airspace structure to ensure the safe operation of all air systems
b	Provide a safe operating environment for high-risk military activities.	Provide a safely designed airspace structure to ensure the safe operation of high-risk military activities in the delivery of Defence of the Realm. This includes the equivalent of passenger jets with hundreds of individuals on. It considers the severity of the outcome, not the probability.
c	Must ensure continuation of military and governmental operational activity	RAF Brize Norton must be able to operate to its current commitments and future Defence requirements.
d	Should facilitate design using modern navigational technology	RAF Brize Norton's airspace is legacy; it is 40+ years old. The MOD wants to update Brize's approaches to meet the requirement of current and future air systems.
e	Conform to the principles of the CAA's Policy for the Design of Controlled Airspace Structures.	The current design is no longer appropriate for current arrival and departure profiles. Elements of these profiles regularly leave the protected confines of CAS. The MOD wishes to contain redesigned and new procedures.
f	Use standard airspace structure where possible (conformity, simplicity, and safety)	Airspace structures and associated usage rules vary and can be difficult to understand. Standard and simple airspace structures are preferred.
g	Draw direction from the Airspace Modernisation Strategy.	It is important to the MOD to embrace the new and emerging strategy since it may lead to a means to reduce impact on other airspace users and to minimise the need to implement further changes as the strategy matures.
h	Minimise the impact to other airspace users.	A change in airspace does not need to increase complexity. Airspace that is returned should be usable.
i	Use Flexible Use of Airspace (FUA) principles to manage the airspace.	UK airspace is congested and has many users. It is important to make airspace available to the greatest extent possible and minimise restrictions.

## **Feedback on Draft Design Principles**

All comments from stakeholders were collated and arranged under the relevant draft DP; individual responses to feedback can be found at annex F. Where it was assessed that a new DP had been proposed, these were listed separately and reviewed (page 14). All feedback was acknowledged, reviewed, and used in creating this document. Where a change to the draft DP was accepted, this was annotated, and a revised DP was proposed.

### **DP (a). Provide a safe environment for all airspace users**

The requirement for a safe operating environment as a DP was not contested during the Stage 1 engagement and was deemed of high importance, requiring no further explanation.

Lewknor Parish Council requested the DP itself includes the phraseology 'high priority,' but the Change Sponsor did not deem this necessary as the DPs will be ranked. An individual stakeholder agreed with the DP and explained how this could be achieved through procedures. As this ACP is for the design only, the procedures will not be used for the DPs. However, the stakeholder's suggestions will be considered when designing the procedures.

*Outcome: DP (a) wording remains unchanged*

### **DP (b). Provide a safe operating environment for high-risk military activities.**

Although this DP received positive feedback and general agreement, a couple of stakeholders questioned its requirement to be its own DP and felt it was captured within DP (a) and (c). After reviewing the DP and feedback, the Change Sponsor agreed with these comments and have removed DP(b).

*Outcome: DP (b) removed*

### **DP (c). Must ensure continuation of military and governmental operational activity.**

The requirement for continuation of military and governmental activity received strong agreement. However, there were two stakeholders questioning its relevance. The GAA questions the need for such a DP, as military and governmental activity will continue with or without a successful ACP. NATS stated the DP was captured in the covering letter. However, the covering letter does not drive the ACP, so it needs to be evidenced in the DP.

Lewknor Parish council suggested DP (c) be reworded to 'Continuation of government and military operations including high risk activity is paramount.' This was considered but the Change Sponsor felt it not necessary to change.

*Outcome: DP (c) wording remains unchanged*

### **DP (d). Should facilitate design using modern navigational technology**

No stakeholder opposed DP (d). ██████████ explained procedures that could be used but as previously stated this ACP is not for procedure change. Bampton Parish

Council asked the impact on the community be discussed; this is a not a DP, but a meeting was offered to Bampton.

Two stakeholders suggested rewording:

Lewknor - 'Modernisation to facilitate to minimise pilot and controller workload.' The Change Sponsor is unable to monitor or analyse whether a design has changed workload, which will make it difficult to determine if a design adheres to or rejects this DP.

NATS - "The airspace design should enable the use of modern navigation equipment and procedures." The Change Sponsor approves the subtle changes suggested by NATS and has changed the wording of the DP.

Outcome: DP (d) wording has changed.

**DP (e). Conform to the principles of the CAA's Policy for the Design of Controlled Airspace Structures.**

The majority of stakeholders supported DP (e). A suggestion was made to incorporate the phrase 'reasonable endeavours to conform.' This was deemed appropriate as the sponsors will be creating controlled airspace to contain procedures and understands this could consume copious amounts of airspace, something the sponsor wishes to avoid and has been informed by the CAA, if evidenced correctly can request dispensation to not completely adhere to the contain guidelines. This is further agreed with by the GAA, who dislike the policy due to its 'disproportionate in its application.'

Lewknor Parish Council suggested DP (e) be reworded to Conform to the requirements of CAP1616.' However, CAP1616 and Policy for the Design of Controlled Airspace Structures are different documents, addressing different topics, therefore the suggested amendment was rejected.

Outcome: DP (e) wording has changed.

**DP (f). Use standard airspace structure where possible (conformity, simplicity, and safety)**

All stakeholders that provided feedback agreed, stating the need for simplicity and return of class G airspace where possible. NATS suggested changing 'standard' to 'standardised.' An alteration the Change Sponsor agreed with. The GAA recommended the removal of 'where possible' because an aim needs to be direct. The Change Sponsor agreed with this and removed the phrase.

Outcome: DP (f) wording has changed.

**DP (g). Draw direction from the Airspace Modernisation Strategy.**

Strong agreement from all stakeholders who responded. NATS proposed a change of 'draw direction from AMS to *Align with the AMS*,' which the Change Sponsor has decided to use. The GAA requests a firmer statement as 'AMS is the guide with regard to the principle of airspace change.' Although true, the Change Sponsor wishes to comply and evidence how they will do this with their designs.

Outcome: DP (g) wording has changed.

**DP (h). Minimise the impact to other airspace users.**

Unsurprisingly there was no stakeholder opposing DP (h). The GAA request that DP (h) be consider priority 2. The Change Sponsor agrees the priority of DP (h) should be changed and has moved it up the list to priority to number 3.

*Outcome: DP (h) wording remains unchanged.*

**DP (i). Use Flexible Use of Airspace (FUA) principles to manage the airspace.**

Agreement from all stakeholders. Gloucester recommends times and dates remain simple; this will be considered when designing the airspace, but the Change Sponsor did not feel it necessary to be part of the DP itself. The GAA state 'It's important to explain what is meant by this principle and how you propose delivery.' The proposal on how to deliver it will be part of the design itself and may differ between designs, so cannot be part of the DP.

*Outcome: DP (i) wording has unchanged.*

## Additional Suggested Design Principles

There were 12 additional DPs suggested as follows:

Suggested Design Principle		Analysis by Change Sponsor	Design Principle Accepted?
1	Ensure safe integration/coordination of London Oxford Traffic.	The Change Sponsor feels this suggested DP is covered with DP a and i.	No
2	Establish the points of failure within the earlier ACP	This does not drive the design; hence, the Change sponsor does not consider this to be a DP. However, the Change Sponsor will be addressing previous ACP failures throughout the project.	No
3	Engagement - MOD shall engage with other airspace users and other stakeholders particularly but not only NATMAC members and local communities within 30 miles of RAF Brize Norton providing timely feedback	Not considered a DP, although engagement is a requirement of the CAP1616 process and BZN intends to engage as much as possible with all current and new (introduced throughout process) stakeholders.	No
4	Environment - Re-designed airspace will consider the benefits and nuisance effects including but not limited to noise, fuel benefits and fuel disbenefits release of airspace and expansion of CAS	Environmental impact analysis is part of the CAP1616 process. As a military ACP, the Change Sponsor is not required to conduct environmental impacts analysis. However, they will be considering environmental impact of civilian aircraft only.	No
5	Minimum turn radius for all departures, all approaches and departures needing turns to be restricted to say 210 or 180kts, to ensure a reasonable turn radius not requiring so much airspace.	The ACP is for the design of new airspace, not procedures. Although the Change Sponsor intends to create new and redesign old procedures, this does not fall under the CAP1616 process for airspace design and will be regulated by the MAA. However, these points will be considered in the procedure design process.	No
6	May we suggest including some environment related DPs. We can suggest the following examples: -Minimise populations overflown if other options would have no adverse impact on MoD activities -Provide high performance and low performance procedures to reduce unnecessary track miles and low level operations for higher performing aircraft	Environmental impact analysis is part of the CAP1616 process. As a military ACP, the Change Sponsor is not required to conduct environmental impacts analysis. However, they will be considering environmental impact of civilian aircraft only.	No
7	You sent us out a multiple page letter which only says 'we want to make changes' That could have been accomplished in a sentence or two! What you haven't said is what you want to do. The most obvious to the residents is to land at greater than 3 degrees	There are no designs available yet, as the Change Sponsor is only at Stage 1, Step B. Designs will be sent out to stakeholders in Stage 2, as mandated by the CAP1616 process. The ACP is for the design of new airspace, not procedures. Although the ACP Sponsor intends to create new and redesign old procedures, this does not fall under the	No

	to reduce residential noise and to have your training flights at a higher altitude.	CAP1616 process for airspace design and will be regulated by the MAA. However, these points will be considered in the procedure design.	
<b>8</b>	Develop and integrated solution with other airspace users	The sponsor is already working closely with LOA and the CEO of GAA, who represent a vast amount of local airspace users. This suggested DP does not drive the design itself.	No
<b>9</b>	Minimise the overall impact of the design (which is not necessarily limited to other airspace users)	The Change Sponsor is unsure of the meaning of this suggested DP.	No
<b>10</b>	And, finally, minimise the impact on the Cotswold Natural Landscape, bearing in mind the purpose of its designation being to conserve & enhance the natural beauty of the area (including its relative tranquillity)	Environmental impact analysis is part of the CAP1616 process. As a military ACP, the Change Sponsor is not required to conduct environmental impacts analysis. However, they will be considering environmental impact of civilian aircraft only.	No
<b>11</b>	"MAC risk will not be exported to other Airspace users." Objective analysis will be used to support this	The Change Sponsor does not feel a separate DP regarding safety is required. Safety is the number one priority and feel that DP (a) (provide a safe environment for all airspace users) umbrellas this.	No
<b>12</b>	Where changes are made they should include everything they can to minimise the impact on local communities	Environmental impact analysis is part of the CAP1616 process. As a military ACP, the Change Sponsor is not required to conduct environmental impacts analysis. However, they will be considering environmental impact of civilian aircraft only.	No

**None of the suggested DPs were accepted.**



## Additional Questions Feedback

As part of the feedback stakeholders were also given the chance to answer further questions and provide any additional information.

12) What is your biggest concern, if any, about the design principles (DP)?

██████████ concern is the possibility of 'grabbing' more airspace to contain the current outdated procedures. Although this ACP is for airspace only, the Change Sponsor will be working to redesign and create new procedures alongside this ACP to facilitate the ever-improving aircraft and their technologies. Gloucester Airport is concerned that increases in controlled airspace will affect Gloucester IAPS. The Change Sponsor does not expect this to be an issue but will continue to engage with Gloucester airport throughout the ACP to ensure that the airspace can be safely shared, and any potential impacts minimised.

13) Are there any other DP you would like the MOD to consider?

Feedback has been provided on Additional Suggested DP on page 14 and 15.

14) Are there any draft DP you would like the MOD to consider removing/rewording?

Responses provided have been discussed in Feedback on Draft DPs, pages 11 to 13.

15) Should the MOD prioritise some design principles ahead of others?

All responses requested that safety be the priority.

16) Would you like any more detail to be included in the design principles?

Defence Airspace and Air Traffic Management (DAATM) asked how the Change Sponsor sees FUA being implemented. The Change sponsor was made aware of the difference between Flexible Use of Airspace and Flexible Use Arrangements<sup>3</sup>. After reading and learning the difference, the change sponsor intends to keep it as Flexible Use of Airspace, as they feel this is more appropriate.

17) Would you like a face to face to discuss specific questions regarding our proposal? If so, please leave contact details.

Stakeholders who requested meetings were contacted.

18) Additional Information.

██████████ provided feedback for all DPs. However, he did this by stating how best to adapt the procedures. As an ex-pilot he has provided knowledgeable feedback on procedures. However, as mentioned throughout the document, this

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<sup>3</sup> Flexible Use of Airspace (FUA), which is a specific airspace management concept defined by ICAO whereby airspace is no longer designated as either pure civil or military airspace, but rather be considered as one continuum in which all airspace user requirements have to be accommodated. Flexible Use Arrangement that would see the closure of some or part of the controlled airspace when it is not required for planned IFR flights. It might be possible to switch the airspace classification according to time of day.' (CAP1991, para 167)

ACP is for airspace design only and not procedures, but his comments will be used with the procedure designs being created alongside the ACP.

The main concern from local stakeholders is the possibility of increased overflight at lower levels by military aircraft, leading to an increase in noise. The new procedures themselves are out of scope of this ACP because they are not regulated by the CAA, and the CAA has been directed not to consider the environmental impact of military aviation during ACPs. That said, it is anticipated that the modernisation of procedures will mean aircraft remain higher on approach before making a continuous descent and that aircraft climb out on steeper gradients, in turn generating less noise for the majority of local residents.

An appropriate level of environmental impact analysis will be completed for displaced civil traffic patterns, with comparison against a current baseline of civil traffic operating in the vicinity of the BZN CTR.

## Final Proposed Design Principles

Safety is the highest priority and so DP (a) is automatically assigned Priority 1. This was echoed by the feedback received from stakeholders. The only other DP that received priority feedback was DP (h) - 'Minimise the impact to airspace users,' which has now been moved to DP (c), where it has received priority 3.

The priority of all other DP did not receive feedback from stakeholders and has been assigned priority by the Change Sponsor.

Design Principles		Priority
a	Provide a safe environment for all airspace users	1
b	Must ensure continuation of military and governmental operational activity	2
c	Minimise the impact to other airspace users	3
d	The airspace design should enable the use of modern navigation equipment and procedures	4
e	Reasonable endeavours to conform to the principles of the CAA's Policy for the Design of Controlled Airspace Structures	4
f	Use standardised airspace structure (conformity, simplicity, and safety)	5
g	Align with the Airspace Modernisation Strategy	6
h	Use Flexible Use of Airspace (FUA) principles to manage the airspace.	6

## Section 3

### Next Steps

This document aims to provide evidence to the CAA in support of Step 1B of the CAP1616 process and will be submitted in time to meet the Define Gateway on 30 Jun 23.

Stage	Dates
<b>DEFINE GATEWAY</b>	<b>30 Jun 23</b>
<b>DEVELOP and ASSESS GATEWAY</b>	<b>27 Oct 23</b>
<b>CONSULT GATEWAY</b>	<b>26 Apr 24</b>
<b>UPDATE and SUBMIT</b>	<b>13 Sep 24</b>
<b>DECIDE GATEWAY</b>	<b>25 Apr 25</b>
<b>TARGET AIRAC</b>	<b>Aug 25</b>
<b>IMPLEMENT</b>	<b>16 Aug 25</b>

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**MINUTES OF ENGAGEMENT MEETING BETWEEN THE GENERAL AVIATION ALLIANCE AND RAF BRIZE NORTON HELD AT RAF BARIZE NORTON - 14 NOV 22**

<b>Present</b>		Stn Cdr
		OC OSW/BZN AO
		SATCO
		OC AM STANEVAL
		XO ATC
		General Aviation Alliance
		British Gliding Association

Item	Minutes	Action / lead
<b>1. Matters arising from previous minutes</b>	1.0 There were no outstanding matters from previous meetings.	
<b>2. Opening Address</b>	2.1 <b>Station Commander's Welcome.</b> The Stn Cdr welcomed everyone and explained the aim of the meeting was to continue to foster relationships with external stakeholders, introduce them to the new BZN Commanding Officer (CO) and to discuss the ACP and its nascent design principles (DP). It was also a useful time for stakeholders to discuss AOB.	Stn Cdr
<b>3. ACP</b>	<p>3.1 <b>Timelines.</b> An overview of the past and present BZN ACPs and current timelines. The reasoning for the ACP and the intent to use principles from <a href="#">The Policy for Design of Controlled Airspace Structures 2022</a>.</p> <p>3.2 <b>CAP 1616 Phase 1B.</b> It was noted that the intent is to develop a set of DPs that allows a large selection of options to be developed at Stage 2 and to not prejudice the result of Key Stakeholder (KSH) engagement at this stage.</p> <p>3.3 <b>Traffic Data.</b> It was outlined that there was a requirement to define the current traffic situation in the region of the BZN CTR as part of the Phase 1B activity. BZN will make use of the CAA's <a href="#">Cotswold Report</a> for quantitative data on the prerequisite that the data is available to all KSHs to interrogate.</p> <p>3.4 <b>Design Principles.</b> Each draft DP (as per Annex A) was discussed with the following discussion points:</p>	SATCO/XO ATC

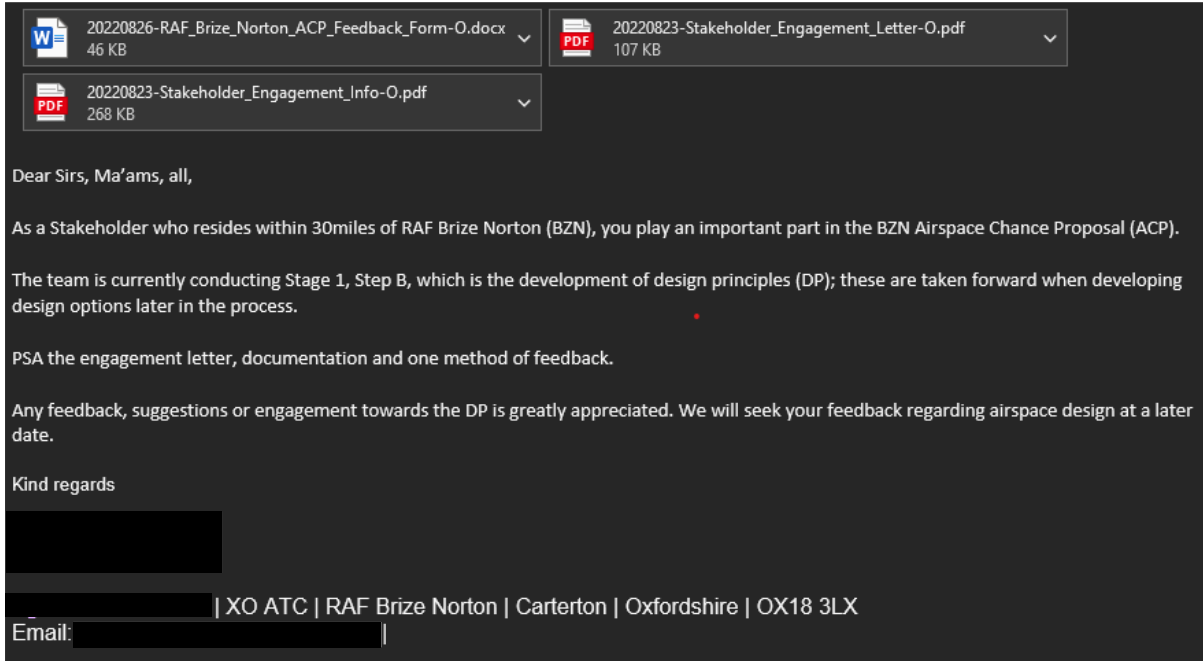
	<p>3.4.1 <b>DP b.</b> Concerns raised over the clarity of 'high risk military activity'. It was stated that high risk is not primary driven by probability but severity of the outcome if a MAC were to occur.</p> <p>3.4.2 <b>Decision.</b> Expand rationale and clarify the activities. It was stated that it is not probability but severity of the outcome if a MAC were to occur. Provide clarity wrt holistic solutions/approach.</p> <p>3.4.3 <b>DP h.</b> It was felt that this is not a matter of impact but of allowing for utility of airspace</p> <p>3.4.4 <b>Decision.</b> Add 'utility of airspace' in DP h.</p> <p>3.5 <b>IAPs.</b> Alongside the ACP would be the development of new and redesigned procedures, produced by the same designer of the airspace but later assured by Osprey. Concern was raised that if moving to GPS based nav, what reserves were in place for GPS failure and targeting. Further 2/3 in place. PAR extended to 2030, with the possibility of longer. The GAA noted that if using CAA Containment Policy, the airspace would be huge to contain the procedures. Hence, the importance of the word <i>principles</i> and an attitude of challenge to dogmatic approaches.</p> <p>3.7 <b>Continuity of staff.</b> The stakeholders were informed that the current COs will be present for the next few stages but not the implementation. However, handovers will be gradual, and COs will not be changing at the same time.</p> <p>3.8 <b>Decisions.</b> In order to ensure continued engagement on the ACP a next steps agenda was discussed:</p> <ul style="list-style-type: none"> <li>a. Arrange a meeting with the same stakeholders prior to the design of the airspace to collate ideas.</li> <li>b. Create a liaison network with GA and BGA.</li> <li>c. Arrange flight with GAA and BGA to view the situation from their perspective.</li> </ul>	<p>SATCO</p> <p>SATCO</p> <p>XO ATC</p> <p>SATCO</p> <p>XO ATC</p>
<p>4. AOB</p>	<p>4.1 <b>Unintended TCAS.</b> There was a general acceptance that, whilst improving, that was some way to go in the understanding of Class D separation rules from both the military and GA community. Whilst see-an-avoid is well understood, the judgement of 'safe-separation' varies. TCAS activation was discussed, a lack of awareness of relative tracks likely to trigger TCAS were outlined.</p> <p>4.2 <b>Decision.</b> A discussion of 'best practice' separation minima will be added to the Mar 23 RAUWG.</p> <p>4.3 <b>Gliding Activity.</b> Whilst ATC BZN now make use of the FLARM and ADS-B data to provide generic traffic information with the Area of Intense Aviation Activity (AIAA) it was felt that this could</p>	<p>SATCO</p>

	<p>be made more definitive through use of a 'glider state' function. Identifying these times may be useful in deciding lower risk flight profiles.</p> <p>4.4 <b>Decision.</b> Consider the utility of 'Glider States' at BZN as per corporate memory drawn from RAF Linton-on-Ouse.</p> <p>4.5 <b>Pg MARSHALL.</b> An update on the programme progress was outlined. Concerns raised over the inability to see aircraft travelling at less than 40knots, BGA note that this is not a rare occurrence for gliders. SATCO explained the benefits of the new radar system and that on balance it is a marked improvement.</p>	OC Staneval
<b>5. Date of next meeting</b>	TBC	XO ATC



## Engagement Letters

### Original email sent to all stakeholders with attachments



The screenshot shows an email client interface with a dark background. At the top, there are three attachment cards. The first card shows a Word document icon, the filename '20220826-RAF\_Brize\_Norton\_ACP\_Feedback\_Form-O.docx', and the size '46 KB'. The second card shows a PDF icon, the filename '20220823-Stakeholder\_Engagement\_Letter-O.pdf', and the size '107 KB'. The third card shows a PDF icon, the filename '20220823-Stakeholder\_Engagement\_Info-O.pdf', and the size '268 KB'. Below the attachments, the email body text is displayed in white. It starts with a salutation, followed by a paragraph about the stakeholder's role, a paragraph about the current project stage, a paragraph about the attachments, a paragraph about feedback, and a closing with 'Kind regards' and a redacted signature. At the bottom, there is a redacted address line and an 'Email:' label followed by a redacted email address.

20220826-RAF\_Brize\_Norton\_ACP\_Feedback\_Form-O.docx  
46 KB

20220823-Stakeholder\_Engagement\_Letter-O.pdf  
107 KB

20220823-Stakeholder\_Engagement\_Info-O.pdf  
268 KB

Dear Sirs, Ma'ams, all,

As a Stakeholder who resides within 30miles of RAF Brize Norton (BZN), you play an important part in the BZN Airspace Chance Proposal (ACP).

The team is currently conducting Stage 1, Step B, which is the development of design principles (DP); these are taken forward when developing design options later in the process.

PSA the engagement letter, documentation and one method of feedback.

Any feedback, suggestions or engagement towards the DP is greatly appreciated. We will seek your feedback regarding airspace design at a later date.

Kind regards

[Redacted Signature]

[Redacted Address] | XO ATC | RAF Brize Norton | Carterton | Oxfordshire | OX18 3LX

Email: [Redacted Email Address]



Original attached letter sent to all stakeholders



**ACP Team**  
ATC, Building 150  
RAF Brize Norton  
Carterton  
Oxfordshire  
OX18 3LX

Email: BZN-TATCCS-ACP@mod.gov.uk

Date: 01 Feb 23

Dear Stakeholder,

The MOD has initiated an Airspace Change Proposal (ACP) to enhance a safe operating environment for all airspace users. RAF Brize Norton is required to provide an Air Traffic Control Service to aircraft operating to and from the aerodrome; current containment and airspace configuration does not allow for this. This ACP intends to address these matters and the departure requirement associated with London Airspace Modernisation Programme 2 Deployment 1.1 (LD1.1), with the modernisation and containment of procedures. The MOD intends to redesign the current controlled airspace to the appropriate volume to support RAF Brize Norton's operations, release unrequired airspace and enable safe, efficient access for other air space users. Please find attached a document providing more details about the requirement.

The MOD is following the CAP1616 process to ensure that the interests of all potentially affected stakeholders are considered.

Please promulgate the letter to ensure that as many potentially affected stakeholders have the opportunity to engage. We welcome feedback on the proposed Design Principles and ask that it be sent by your preferred method, and that you respond by 30 Apr 23.

Kind regards,

ACP Sponsor



# Ministry of Defence

**ACP Team**

ATC, Building 150  
RAF Brize Norton  
Carterton  
Oxfordshire  
OX18 3LX

Email: BZN-TATCCS-ACP@mod.gov.uk

Date: 01 Feb 23

## **AIRSPACE CHANGE PROPOSAL - ACP-2022-040**

### **Introduction**

At RAF Brize Norton, the MOD intends to redesign the current controlled airspace to the appropriate volume to support RAF Brize Norton's operations, release unrequired airspace and enable safe, efficient access for other air space users.

The dimensions of the Controlled Airspace (CAS) surrounding RAF Brize Norton has been in place for over 40 years, with very few amendments. With the change of aircraft types now using the aerodrome, coupled with the criteria used to design the procedures, the current design is no longer appropriate for current arrival and departure profiles. Elements of these profiles regularly leave the protected confines of CAS. Military operations are not mandated to comply with CAA Containment Policy however, the policy exists for sound rationale and the MOD wishes to conform to CAA guidelines as much as possible. The MOD wishes to contain redesigned and new procedures, thus future proofing operations at RAF Brize Norton; this modernisation also allows RAF Brize Norton to change with the Airspace Modernisation Strategy (AMS) and London Airspace Modernisation Programme (LAMP).

### **AMS**

As with Brize, the UK airspace is dated. Over the years, it has accommodated the growth in demand for air transport by adding significant complexity to the UK's airspace system, primarily over South-East England where volumes of traffic are highest. This has made UK Airspace some of the most complex in the world. Despite the increase in complexity, 'many air routes and air traffic management practices are not utilising the modern technologies available and aircraft continue to use flightpaths that are outdated,' resulting in inefficiencies and greater fuel burn and emissions. Unlocking the benefits of modernisation will make journeys faster and more environmentally friendly.

### **LAMP**

Airports that are affected by the LAMP are looking to modernise their low-level arrival and departure routes, to ensure they can meet the needs for the sustainable future growth. The MOD wants to introduce Performance Based Navigation (PBN) procedures in harmony with LAMP. LAMP has been incorporated into Future Airspace Strategy Implementation – South (FASI-S) programme under the AMS. RAF Brize Norton has not been included as part of the FASI-S programme, but its aircraft must be able to integrate with the airways network both now and in the future.

## Aircraft at RAF Brize Norton

The station has a mixed fleet of aircraft to provide rapid global mobility in support of UK overseas operations and exercises, as well as AAR (Air to Air Refuelling) support for fast jet aircraft, both on operations and in support of UK Homeland Defence. Aircraft stationed at RAF Brize Norton:



**Voyager** is the RAF's sole air-to-air refuelling (AAR) tanker and also operates as a strategic air transport. Fuel offloaded during AAR is taken from the aircraft's standard wing and fuselage tanks, leaving the cabin free for up to 291 personnel and the hold available for freight.



**Hercules (C-130J)** is the RAF's primary tactical transport aircraft and has been the backbone of UK operational tactical mobility tasks since it was brought into service in 1999. It is frequently employed to operate into countries or regions where there is a threat to aircraft; its performance, tactics and defensive systems make it the ideal platform for such tasks. The aircraft is highly flexible, with the ability to airdrop a variety of stores and paratroopers and operate from natural surface landing zones.



**Globemaster (C-17)** is capable of rapid, strategic delivery of troops and all types of cargo to main operating bases anywhere in the world. The Globemaster's load-bearing rear ramp and digitally controlled loading systems, combined with the skills of its crews and ground handlers, enable large, complex items of equipment, including Chinook helicopters, military vehicles, etc to be loaded.



**Atlas C.1 (A400m)** provides airlift and strategic oversized lift capabilities complementing those of the Hercules and C-17 fleets. It can accommodate as many as 116 fully equipped troops or a combination of vehicles, pallets, and personnel, up to a payload of 37 tonnes. Loads are delivered by parachute, gravity extraction or by landing. Paratroops will be dropped from the aircraft's dedicated paratroop doors, or from the rear ramp.

## **Airspace Change Proposal (ACP)**

The MOD has initiated an Airspace Change Proposal (ACP) to enhance a safe operating environment for all airspace users and to modernise and contain procedures.

Changes to UK airspace are legally required to follow the process laid down in the CAP1616, details of which can be found online. This process aims to ensure a fair and transparent dialogue between the Change Sponsor and any affected stakeholders. It also ensures that the changes are not arbitrarily applied without full engagement and formal consultations. The CAA, as an impartial regulator, will hold Change Sponsors to account and ensure that CAP1616 is followed correctly as part of its decision-making responsibility.

The CAP1616 process encompasses seven stages. Each stage is considered separately and sequentially by the CAA based on a pre-agreed timeline. The process is not solution driven and each stage informs the next. In this instance, the requirement is to modernise and contain new procedures. This was presented to the CAA at the first stage of the ACP process and the CAA has agreed that an airspace change is an appropriate means by which to achieve this. All documentation relating to the ACP can be found on the CAA's Airspace Portal.

### **Design Principles – Stage 1: Define Step b: Design Principles**

The creation of any new airspace or procedures first requires airspace design principles to be developed, which are then taken forward when developing design options later in the process. The MOD is keen to engage with stakeholders and is asking for your feedback on the initial draft principles. The Sponsor will then submit a final Design Principles document to the CAA after all feedback has been received.

The MOD will engage with NATMAC members and has also selected local stakeholders from an area within a radius approximately 30 miles of RAF Brize Norton.

The MOD has compiled a set of draft design principles. At this stage we are not seeking feedback on the wider proposal, stakeholders will have an opportunity to do this later in the Airspace Change process once the proposal has been developed in greater detail. The MOD would like to understand which elements of the airspace design principles you, as another airspace user, deem important and would like to be considered. As a stakeholder you are now invited to consider the draft design principles. The list is not exhaustive, but you may wish to comment on the following:

- Are there any other design principles you would like the MOD to consider?
- Would you like the MOD to discount any of its draft design principles?
- Should the MOD prioritise some design principles ahead of others?
- Would you like any more detail to be included in the design principles?

Any additional detail and reasoning behind your feedback is encouraged.

## Draft Design Principles

Letter	DP	Rationale
a	Provide a safe environment for all airspace users	Provide a safely designed airspace structure to ensure the safe operation of all air systems
b	Provide a safe operating environment for high-risk military activities.	Provide a safely designed airspace structure to ensure the safe operation of high-risk military activities in the delivery of Defence of the Realm. This includes the equivalent of passenger jets with hundreds of individuals on. It considers the severity of the outcome, not the probability.
c	Must ensure continuation of military and governmental operational activity	RAF Brize Norton must be able to operate to its current commitments and future Defence requirements.
d	Should facilitate design using modern navigational technology	RAF Brize Norton's airspace is legacy; it is 40+ years old. The MOD wants to update Brize's approaches to meet the requirement of current and future air systems.
e	Conform to the principles of the CAA's Policy for the Design of Controlled Airspace Structures.	The current design is no longer appropriate for current arrival and departure profiles. Elements of these profiles regularly leave the protected confines of CAS. The MOD wishes to contain redesigned and new procedures.
f	Use standard airspace structure where possible (conformity, simplicity and safety)	Airspace structures and associated usage rules vary and can be difficult to understand. Standard and simple airspace structures are preferred.
g	Draw direction from the Airspace Modernisation Strategy.	It is important to the MOD to embrace the new and emerging strategy since it may lead to a means to reduce impact on other airspace users and to minimise the need to implement further changes as the strategy matures.
h	Minimise the impact to other airspace users.	A change in airspace does not need to increase complexity. Airspace that is returned should be usable.
i	Use Flexible Use of Airspace (FUA) principles to manage the airspace.	UK airspace is congested and has many users. It is important to make airspace available to the greatest extent possible and minimise restrictions.

## **Feedback**

All the details of this airspace change proposal are available on the CAA's Airspace Change Portal. The ACP identification number is ACP-2022-040.

Feedback can be provided in the following ways:

- Email: BZN-TATCCS-ACP@mod.gov.uk
- Letter: ACP, ATC, Building 150, RAF Brize Norton, Carterton, Oxfordshire, OX18 3LX
- Word Documentation: see email attachment
- Microsoft Forms Link: [Form](#)

The use of forms or word documentation is not mandatory. We appreciate feedback in your preferred method.

Please advise if you require further engagement and, if so, your preferred point of contact.

**Reponses regarding the draft Design Principles must be received by 30 Apr 23.**

Date issued: 31 March 2023

File reference: 20230323-Oxfordshire RAUWG Meeting Minutes – Mar 23

**MINUTES OF THE OXFORDSHIRE RAUWG ENGAGEMENT – 22 Mar 23**

Present in Person	[REDACTED]	RAF Brize Norton (BZZ) OC OSW
	[REDACTED]	COS RAF Benson (BEN)
	[REDACTED]	Chair/RAF BZZ STACO
	[REDACTED]	SO2 Air Activities
	[REDACTED]	24 Sqn
	[REDACTED]	RAF Safety Centre
	[REDACTED]	DAATM
	[REDACTED]	OIC RAF BEN Flying Club
	[REDACTED]	BZZ Air Safety Manager
	[REDACTED]	2FTS
	[REDACTED]	RAF BEN SATCO
	[REDACTED]	99 Sqn BZZ
	[REDACTED]	RAF Sport Aircraft and the Halton Aero Club.
	[REDACTED]	206 Sqn
	[REDACTED]	6FTS
	[REDACTED]	RAF BZZ
	[REDACTED]	Boscombe Down
	[REDACTED]	USAF, Fairford
	[REDACTED]	USAF, Fairford
	[REDACTED]	CAA
	[REDACTED]	London Oxford Airport
	[REDACTED]	London Oxford Airport
	[REDACTED]	GASCo
	[REDACTED]	CAA
	[REDACTED]	CAA
	[REDACTED]	RAF BZZ Flying Club and JSPC Weston
	[REDACTED]	Turweston Flying Club
	[REDACTED]	National Police Air Service
	[REDACTED]	Oxford Gliding
	[REDACTED]	Vale of White Horse Gliding Centre
	[REDACTED]	AirTanker
	[REDACTED]	AirTanker
	[REDACTED]	Challow Paramotor Club
[REDACTED]	Challow Paramotor Club	
[REDACTED]	CEO of British Microlight Aircraft Association	
[REDACTED]	RAF Charitable Trust Enterprises	
[REDACTED]	Leading Edge Aviation Ltd	
[REDACTED]	Bicester Aerodrome company	
[REDACTED]	Bicester Aerodrome company	

Present Virtually	██████████	GAA
	██████████	CHIRP
	██████████	Helicopter Club of Great Britain
	██████████	Altitude Angel
	██████████	Altitude Angel
	██████████	CEO and Airspace Lead for the Light Aircraft Association at Turweston
	██████████	Thames Valley Hang Gliding and Paragliding Club, Vale of White Horse Gliding Centre
	██████████	Safety Manager and Flight Instructor at The Pilot Centre Ltd, Denham Airfield
	██████████	SATCO Boscombe Down

Item	Minutes	Action / lead
<b>1. Opening Address</b>	1.1 AH opened the WG with a warm welcome to RAF Brize Norton (BZZ), noting the exceptional attendance and support the meeting is achieving. He went on to highlight the current Op output of BZZ along with the current infrastructure issues that the Station is dealing with.	AH
<b>2. Matters Arising from Previous minutes</b>	2.1 All reviewed and accepted as closed or to be addressed in the WG.	JG
<b>3. Brize Norton (BZZ) ACP</b>	<p>3.1 <b>Overview.</b> JG discussed the intent, timeline, and draft design principles (DP) currently out to stakeholder for feedback. All documentation relating to the ACP can be found on the <a href="#">CAA Portal</a>.</p> <p>3.1.1 <b>Intent.</b> The ACP intends to redesign the current controlled airspace to the appropriate volume to support RAF BZZ's Operations, release unrequired airspace and enable safe, efficient access for other airspace users.</p> <p>3.1.2 <b>Timeline.</b> Last day for DP feedback is 30 Apr 23, to allow time to assess feedback for the Define Gateway date. The new airspace implementation date is Aug 25. Airspace designs will be sent to stakeholder for feedback between Jul – Sep 23. <i>Please note all dates are subject to change.</i></p> <p>3.1.3 <b>Draft Design Principles.</b> It was stated that the RAUWG was an opportunity for stakeholders to provide feedback and asked questions, however, none were raised. Feedback can be provided <a href="#">here</a>.</p> <p>3.2 <b>Questions</b></p> <p>3.2.1 <b>IFPs.</b> The CAP1616 process does not obliged candidates to show IFP designs the airspace is being developed around. It was questioned whether BZZ would be willing to share their IFP designs as part of transparency.</p>	JG



	<p>a) It was stated that BZZ would be happy to, provided they are not breaking regulations.</p> <p>3.2.2 <b>London Oxford Airport (LOA).</b> Are BZZ in communication with LOA?</p> <p>a) Oxford has a letter of agreement that covers most scenarios. Whilst the remaining part is currently under discussion – a box.</p>	
<b>4. Weston on the Green (WotG)</b>	<p>4.1 <b>Overview.</b> There are changes to come to WotG and parachuting as a whole; governance, assurance and regulations are under review. The head of establishment and CoC are based at Cranwell (CWL), miles away from WotG and the place has been run as an airfield, not a Drop Zone (DZ), with a low level of jumping.</p> <p>4.1.1 <b>Ownership.</b> The ownership of WotG is anticipated to change, to bring the CoC closer to the DZ, potentially changing from 22gp to 2gp.</p> <p>4.1.2 <b>Jumps.</b> WotG is expected to become increasingly busier, with jump numbers rising to between 600 and 800 a year.</p> <p>4.2 <b>Questions</b></p> <p>4.2.1 <b>Hinton-in-the-Hedges (HH).</b> Will the changes affect HH?</p> <p>a) No.</p> <p>4.2.2. <b>Oxford Gliding Club (OGC).</b> Will it take us into account?</p> <p>a) Always.</p> <p>4.2.2 <b>Percentage.</b> What percentage of activities will take place at WotG?</p> <p>a) Military activity will increase, with JSAT tapering off.</p>	DB
<b>5. LOA</b>	<p>5.1 <b>Overview.</b> LOA is growing exponentially. New hanger 15 is already full; talks of hanger 16. There is a grass taxiway, currently OOS due to waterlogging and a new bravo taxiway in development, to shorten route and allow for further aerodrome development.</p> <p>5.2 <b>Questions</b></p> <p>5.2.1 <b>Procedure.</b> When heading South towards Chalgrove, who do pilots need to speak to?</p> <p>a) There is no set procedure but usually LOA.</p>	DA

	<p>5.2.2 <b>Diversions.</b> With LOA growing, will Benson still be able to use them as a diversion?</p> <p>a) Yes, but the question is where to park them.</p> <p>5.2.3 <b>ACP.</b> Are LOA going to do an ACP?</p> <p>a) LOA would align an ACP with BZZ if they could. They do not require an ACP for airspace but will in time to introduce IFP and RNP approaches.</p> <p>5.2.4 <b>Training.</b> Will the increase in commercial take over training?</p> <p>a) A question DA said was for the MD to answer. However, there will need to be a balance between income and parking aircraft.</p>	
<p><b>6.Altitude Angel (AA)</b></p>	<p>6.1 <b>Overview.</b> AA wants to bring together all relevant time sensitive aviation data into one place, providing information to drone flyers on where they can and cannot fly.</p> <p>6.1.1 <b>Arrow.</b> There is also ongoing work with Arrow, a network of ground sensors (cameras with AI overlay to identify) to allow out-of-sight flight.</p> <p>6.1.2 <b>Superhighway.</b> A superhighway is being trialled between reading and Coventry.</p> <p>6.1.3 <b>Drone avoids.</b> It is important to note, that the drone will be staying out of the way of aviation in the air.</p> <p>6.2 <b>Questions</b></p> <p>6.2.1 <b>Superhighway.</b> Have you trialled the length of the superhighway?</p> <p>a) No. The testing is localised, within a few miles. The likelihood is that the superhighway users are search and rescue, NHS blood transport etc., not civilian flights for fun. Meaning they will not need to travel that distance.</p> <p>6.2.2 <b>Data.</b> Integration with conspicuity and multiple systems and can the data go to pilots?</p> <p>a) Flightradar24 is used, and multiple data sources can be taken in at once. Data availability to pilots is in discussion.</p> <p>6.2.3 <b>Cameras.</b> If non squawking uses camera technology, is there a network of them?</p>	<p>CW</p> <p>PB</p>

	<p>a) Yes. The systems will require the drones to avoid all aircraft independent on type.</p> <p>6.2.4 How do cameras preform into the sun and haze?</p> <p>a) Brilliantly. They will not operate if they do not have the visual range required.</p> <p>6.2.5 What ques the camera to turn and follow?</p> <p>a) A sufficient 360degree camera could not be found. They use cameras that do constant checking and overlaying of data.</p> <p>6.2.6 <b>Helicopters.</b> What happens when helicopters pop up from an ad hoc site?</p> <p>a) There needs to be trials regarding this scenario. However, if they are squawking, they can be seen and there are already procedures in place, where the pilot can call up ATC as a warning.</p> <p>6.2.7 <b>Low Level.</b> What about operations below 500ft, such as gliding?</p> <p>a) Encourage route planning to allow it to go into the system and be seen. Otherwise, relying on cameras if not squawking.</p>	
<b>7. RIAT</b>	7.1 <b>Overview.</b> Last year's show was the first one in three years. There was a substantial amount of skill fade, but a significant amount of training took place prior to the event. The Royal Air Force Charitable Trust (RAFCT) is more for inspiring individuals to join, rather than serving and served. They are using multiple lessons learned from last year's event, such as flying hours and safety training.	AM
<b>8. CHIRP</b>	8.1 <b>Overview.</b> Despite being funded by the CAA, they are sperate and independent from them; providing confidentiality to matters. The intent is to have a better and more friendly way of reporting. CHIRP is only interested in the human factor safety value of a report.	SF
<b>9. Bicester Areo</b>	<p>9.1 <b>Overview.</b></p> <p>9.2.1 <b>New Frequency.</b> Confusion when multiple airfields use the same frequency. Now, when working events, Bicester now has a new dedicated frequency, 118.390.</p> <p>9.2.2 <b>Circuit.</b> The circuit height has increased from 800ft to 1000ft. It has also been widened to pass to the East of Statton Audley.</p> <p>9.2.1 <b>Jet Overflight.</b> experience Business Jets passing through the overhead at around 1700' QFE. Overflight at this height presents a substantial risk</p>	AT

	and one that has increased since BAC assumed management of the airfield	
<b>10. AOB</b>	<p>10.1 <b>The future of Abingdon Airfield.</b> After the MAA cease order, safety work was completed, and it now has suedo aero operator. There is to be an Air Show this year.</p> <p>10.2 <b>Volume of VFR/GA Traffic Benson (BEN) Gap.</b> BEN has situational awareness of traffic through FLARM. However, this data is not assured and cannot be used as confirmed traffic information. The upgrading of MOD systems and movement of Radar personnel (MARSHALL Project) generates benefits (different radar personnel in the room to discuss) and downgrades (unable to see a/c below 40knots).</p> <p>10.3 <b>Cotswold Gliding Event.</b> 17-25 June 23</p> <p>10.4 <b>Electronic Conspicuity.</b> Brought up by the CAA, with an information available in RAUWG AOB slide pack.</p> <p>10.5 <b>VHF Low Level Common Frequency.</b> 130.490</p> <p>10.6 <b>Keevil Airfield.</b> Permanent danger area (D123) of 3000ft. Will be active/inactive.</p> <p>10.7 <b>6FTS.</b> Occasionally flying on Saturdays.</p>	All
<b>11. Date of next meeting</b>	11.1 <b>Date.</b> Mar 24	ATC XO



Date issued: 02 May 2023

File reference: 20230427-ACP\_BZN\_Parish\_Council\_Meeting\_Minutes-O

**Minutes of BZN Parish Council Meeting Minutes, 25 APR 23**

<b>Present</b>	[REDACTED]	BZN SATCO
	[REDACTED]	BZN ATC XO
	[REDACTED]	BZN Parish Council Clerk
	[REDACTED]	BZN Parish Council Cllr
	[REDACTED]	BZN Parish Council Cllr
	[REDACTED]	BZN Parish Council Cllr

Item	Minutes	Action / lead
<b>1. Matters arising</b>	1.1 N/a	
<b>2. Item title</b>	<p>2.1 JW welcomed and thanked everyone for their attendance and stated the meeting was for councillors to understand and capture how the ACP will impact themselves and their parishioners.</p> <p>5.1.1</p> <p>2.2 The following points were discussed:</p> <p>2.2.1 <b>Noise.</b> Concerned the change in airspace and procedures may mean needing greater thrust for take-off, which could create more noise.</p> <p style="padding-left: 40px;">a. The departure profile will not change but the approach profile is expected to be steeper, which means higher and quieter. The only noticeable difference may be to individuals who had previously experienced noise baffling from tress etc., may no longer benefit from this due to the increase in height.</p> <p>2.2.2 <b>No. of Aircraft.</b> Will the change see more aircraft?</p> <p style="padding-left: 40px;">a. There will be no difference in military or civilian traffic over Brize Norton Village. However, there may be an increase in civilian traffic outside of the parish, due to the potential of lower uncontrolled airspace (class G) becoming available.</p> <p>2.2.3 <b>Controlled Airspace.</b> Curiosity over why there isn't already controlled airspace to protect the aircraft.</p> <p style="padding-left: 40px;">a. The current airspace is legacy, and the useful protection provided by Lyneham's spiral did not move across with the closure of the base. The previous ACP attempt did not have sufficient evidence for mid-air collision (MAC)</p>	<p style="text-align: center;">JW</p> <p style="text-align: center;">LG</p> <p style="text-align: center;">JG</p> <p style="text-align: center;">LG</p> <p style="text-align: center;">JG</p> <p style="text-align: center;">AS</p>

	<p>risk and was incredibly complicated, hence it's rejection. The new ACP intends to give back airspace, be less complex and work with its neighbours, to produce an airspace fit for all.</p>	JG
<b>3. AOB</b>	<p>3.1 <b>Runway.</b> The runway resurfacing is expected to start in 2025. Estimated length of time was discussed.</p> <p>3.2 <b>Communication.</b> BZN Parish Council no longer receive communication from the station; they would appreciate an improvement in this.</p> <p style="padding-left: 40px;">a. <b>Action.</b> Contact BZN Media and Comms to request this be reimplemented.</p> <p>3.3 <b>Meetings.</b> Decided it would be of benefit to have group council meetings (affected and not affected) regarding the design.</p> <p style="padding-left: 40px;">a. <b>Action.</b> Create a collaborative list and organise meetings.</p>	<p>JG LG</p> <p>WW</p> <p>MB</p> <p>WW</p> <p>MB CLLRS</p>
<b>4. Date of next meeting</b>	a. BZN Parish Council AGM 23 May 23	JW

## Stakeholder Feedback Analysis

DP	Organisation	Their Feedback	Our Response
A. Provide a safe environment for all airspace users	Lewknor Parish	Reword DP to – ‘Safety shall always be the highest priority’. Reword rationale to ‘Various themes of safety may be considered in design principles, but safety as a concept is a fundamental requirement in aviation.’	The ACP team will rank the DP in the documentation.
	██████████ ██████████	Agreed and this should be achieved by military aircraft flying continuous descent approaches based on modern procedures with no unnecessary low-level fixes based on legacy descend to MSA and then fly level for miles in high drag high power high noise configuration. and maximum climb performance departures, together with accurate navigation, thus requiring a much smaller area of low-level controlled airspace, which can be freed up as class G airspace for other users and reduce choke points. The airspace should also be designed for normal efficient use, radar vectors or self-position to a straight in approach, with a continuous descent not going below a 3-degree descent path. Old fashioned procedural approaches or those descending to MSA and then flying level for miles before the final descent should be practiced in the simulator and not need airspace	This ACP is for airspace design only, not procedure. However, these points will be considered for the procedure design.
	Gloucester	Gloucester agree in principle	
	DAATM on behalf of MOD	Agree that this is top priority and should be a ‘must’ design principle.	
	NATS	May we suggest combining DPs A and B; <i>Provide a safe environment for all users</i>	After review DP (b) has been removed.

	Bampton Parish Council	Clearly a priority to us as they fly over our community so need to stay in the sky!	
	General Aviation Alliance (GAA)	Agreed and Sensible. This point covers all safety desires enhancements and potential outcomes. A clear aim that does not require further explanation.	
<b>B. Provide a safe operating environment for high-risk military activities.</b>	██████████ ██████████	These military activities should not be high risk! All the military aircraft can fly normal self-position or radar vectored approaches to an ILS or RNAV final approach, they are all well capable of continuous descent approaches and many of them can do steeper approaches than conventional airliners. The currently drawn approaches descending to MSA miles away and flying level are less safe so this risk should be mitigated by flying continuous descent approaches	This ACP is for airspace design only, not procedure. However, these points will be considered for the procedure design.
	Gloucester	Segregation of military vs civil air systems is prudent especially where Air Defence is a prominent exercise. However, not at the detriment of unusable or inappropriate excessive portions of controlled airspace.	The sponsor agrees with and intends not to propose more controlled airspace than is needed to facilitate safe operations.
	DAATM on behalf of MOD	I'm not sure that this needs to be split out into a separate DP rather than being captured within a and c.	DP (b) has been removed.
	NATS	Please can you clarify what is meant by High Risk Military activities The description of the aircraft types doesn't suggest any high energy manoeuvres, may we suggest (if DPa and DPb are not combined) you amend the DP to read " <i>Provide a safe operating environment for related military activities</i> "	The change Sponsor understands the confusion and reviewing feedback has decided to removed DP (b) as it is covered in both DP (a) and (c).
	General Aviation Alliance (GAA)	Infers that military activities are taking place such as live firing etc. If as I suspect you mean the movement of personnel by aircraft, then the present operation by definition is safe.	The change Sponsor understands the confusion and reviewing feedback has decided to removed DP (b) as it is



		Point 3.a covers this operation. Further, such a statement could be misconstrued as lacking in honesty and it's understood that is absolutely not your intention	covered in both DP (a) and (c).
	Bampton Parish Council	As above	
<b>C. Must ensure continuation of military and governmental operational activity.</b>	Lewknor Parish	Reword DP to 'Continuation of government and military operations including high risk activity is paramount'. Reword rationale to 'The design of new airspace structures shall permit the operation of high-risk military operations, the continuance of RAF Brize Norton current commitments and identified potential future activities.'	After reviewing feedback, the Change Sponsor has decided to removed DP (b) as it is covered in both DP (a) and (c).
	██████████ ██████████	yes, but the airspace should be for following modern continuous descent approaches, or higher rate of descent tactical approaches. Learning old style procedures can easily be done in the simulator as can most training that would requires large chunks of low-level airspace.	This ACP is for airspace design only, not procedure. However, these points will be considered for the procedure design. The sponsor agrees with and intends not to propose more controlled airspace than is needed to facilitate safe operations.
	General Aviation Alliance (GAA)	Do you really need this as a principle? The ACP won't change this existing activity which is carried out by Brize AS. Such activity will continue whether or not change takes place.	Although activity would continue with or without a successful ACP, the Change Sponsor feels it is still an important DP to adhere to as it will help shape and design the airspace.
	NATS	We do not believe this statement is recognised as a design principle. Suggest this is removed as we believe this is already captured in the covering letter	The covering letter will not drive the ACP, so needs to be evidenced in the DP.
	DAATM on behalf of MOD	Agree that this is high priority and should be a 'must' design principle.	
<b>D. Should facilitate design using modern</b>	Lewknor Parish	Reword DP to 'Modernisation to facilitate to minimise pilot and controller workload.' Reword rationale to 'The intent of this principle is, by design, achieve the	Workload cannot be analysed or monitored by the Change Sponsor and will be difficult to evidence how a design

navigational technology.		maximum reduction of controller tactical intervention.’	meets the DP if changed to this wording.
	██████████ ██████████	Yes, modern navigation is much more accurate and has been proven in airline operation worldwide. this would allow controlled airspace to be smaller. But as important is to ensure the procedures are designed correctly so there are no unnecessary low-level fixes. The previous ACP had a RNAV approach to the easterly runway with an IAF at something like 1700ft or above, about 14 miles from the threshold. A point where a professionally flown approach would be at approx. 4300ft. Thus, the base of the proposed airspace was 2000ft too low just to protect that IAF, when no aircraft should be anywhere near that low!	The sponsor agrees with and intends not to take excessive portions of controlled airspace.
	Gloucester	Gloucester agree	
	NATS	May we suggest a change, for clarity, to the title “The airspace design should enable the use of modern navigation equipment and procedures”.	Accepted.
	Bampton Parish Council	We would like to understand what the impact is on the local community of the new technology e.g. Radar Masts etc.	Not relevant to ACP. However, a meeting has been arranged to discuss.
	General Aviation Alliance (GAA)	Agreed, but see below	
DAATM on behalf of MOD	Agree		
E. Conform to the principles of the CAA’s Policy for the Design of Controlled Airspace Structures.	Lewknor Parish	Reword DP to ‘Conform to the requirements of CAP1616.’ Reword rationale to ‘The design of new airspace structures shall comply with the CAA requirements, however, where it is identified that this will impinge on operational needs a detailed mitigation shall be produced.’	CAP1616 and Policy for the Design of Controlled Airspace Structures are two different items.
	██████████ ██████████	Only if the CAA principals have been updated to use radar vectors or self-position to final approach with a continuous descent approach and all fixes to be at or	This ACP is for airspace design only, not procedure. However, these points will be

		above where a 3-degree descent path would be. No low-level fixes based on MSA and no level segments. They should also be designed based on max climb performance and minimum turning circle, which might need holding the speed back to 180 or 210kts as commonly used, not accelerating to 250kts until the turn is completed. Airspace should also be designed based on modern navigation accuracy and 500ft vertical separation minimums.	considered for the procedure design.
	Gloucester	Gloucester agree on the basis this will ensure transparency to all stakeholders	
	NATS	May we suggest amending the title of this DP to something like Reasonable endeavours to conform to the principles of CAA Policy for the Design of CAS structures	Use. As CAS around procedures and approaches/departures will mean consuming large amounts of airspace, which the sponsor does not wish to do. A rewording of this DP seems appropriate.
	General Aviation Alliance (GAA)	GAA does not support the existing CAA containment policy which is disproportionate in its application. It will de-facto lead to an airspace volume that will not satisfy the needs of other airspace users. As a result a better innovative solution will be required that will be at odds with this principle.	CAS around procedures and approaches/departures will mean consuming large amounts of airspace, which the sponsor does not wish to do. The sponsor has already discussed this with the CAA and know the process to request dispensation from this.
	DAATM on behalf of MOD	Agree.	
F. Use standard airspace structure where possible (conformity, simplicity, and safety)	Lewknor Parish	Reword DP to 'Airspace Structure.' Reword rationale to 'It is imperative that any re-designed airspace complies with existing design standards and does not increase complexity. Any airspace released shall be usable to the wider airspace users.'	The DP needs to drive the design and with a DP just as Airspace Structure it does not state what the Change Sponsor wishes to achieve.
	██████████ ██████████	yes, but based on modern approach ad departure procedures. and Yes, Class D	Procedure feedback will be considered when designing procedures.

		where absolutely necessary and the rest returned to class G with no other constraints. they should also use ICAO standard not UK gold plated versions.	
	Gloucester	Gloucester agree, on the basis that options are presented as to the classification of the airspace suggested and the intended availability of flexible use by other airspace users.  Confusing and uncommon dimensions and classification of airspace leads to incursions and or pilots avoiding areas discouraging them to call ATC and create synthetic AIAA's	
	NATS	Propose amending standard to standardised	Will change the wording from standard to standardised.
	General Aviation Alliance (GAA)	See above and remove "where possible". A principle, like an aim should be direct.	The Change Sponsor agrees an aim should be more direct and has removed 'where possible.
	DAATM on behalf of MOD	Agree	
G. Draw direction from the Airspace Modernisation Strategy.	██████████	yes, no more airspace based on 1970s and earlier approach procedures and climb performance of an Avro York on 2 engines!	
	Gloucester	Gloucester agree.	
	General Aviation Alliance (GAA)	Requires a firmer statement. AMS is THE guide with regard to the principle of new airspace.	It may be the guidance, but the Change Sponsor still wishes to adhere and evidence how the designs meet the criteria and to do so it needs to be a DP.
	NATS	May we suggest changing the DP from Draw direction from AMS to <i>Align with the AMS</i>	Will reword.
	DAATM on behalf of MOD	Agree	
H. Minimise the impact to other airspace users.	██████████	Absolutely, much of the current lower airspace in the class D is not required for the transport missions. Design the airspace around updated modern procedures and for real operational use, not legacy	

		procedures and not for training that can be done much cheaper in the simulator.	
	Gloucester	Gloucester agree	
	General Aviation Alliance (GAA)	This should be point 2. The tenant of this principle is very much welcomed.	Will consider increasing priority of DP.
	DAATM on behalf of MOD	Agree	
I. Use Flexible Use of Airspace (FUA) principles to manage the airspace.	Lewknor Parish	Reword DP to 'The exiting principle of Flexible Use of Airspace (FUA) shall be applied.' Reword rationale to the re-design of airspace shall be achieved in such a way to make airspace available to the greatest extent possible with minimum restrictions	
	██████████ ██████████	Yes, the maximum amount of airspace should be returned to class G. ATC should also be able to release other airspace to class G when it's not being used. some of this could be done by having an automatic message on the frequency when someone calls up if there were no ATC present which would say the airspace is not operational and is returned to class G. This is done at many military airfields in France and works well- usually you aren't allowed below 1000ft in the ATZ but that's the only restriction.	BZN is open 24/7, 365days a year.
	Gloucester	Gloucester agrees. However, suggest the FUA times and dates active kept simple. ie active Mon-Fri 0900-1700 and avoid variation and exceptions to this	
	DAATM on behalf of MOD	This will likely become more relevant and effective as technological advances towards a digitised aviation environment enable dynamic activation/deactivation of airspace. In the meantime, enabling access will be important.	
	██████████ ██████████ ██████████	Agreed	

	General Aviation Alliance (GAA)	It's important to explain what is meant by this principle and how you propose delivery.	
	Bampton Parish Council	BPC regularly receive complaints about the use of the airspace above us, in particular using the Church spire as a visual reference point meaning regular overflying and often apparently low flying over the historic centre of the village. We therefore request that in your FUA you remove Bampton Church spire from your list of VRPs and prevent overflying of the centre of the village. This will improve safety, reduce pollution including that caused by noise and improve the quality of life for our parishioners.	

Q	Organisation	Their Feedback	Our Response
<p>12. What is your biggest concern, if any, about the design principles (DP)?</p>	<p>██████████ ██████████</p>	<p>my biggest concern is that the design principals will be based on containing the current poorly designed approach procedures with low level fix altitudes requiring much lower base of airspace than really necessary. similarly, as well as far too low Fix altitudes, many of the procedures are based on low level holds and procedural approaches, these should not be considered. The first job must be to re-write the approach procedures to ensure there are no fixes below a 3-degree continuous descent path and only radar vectors or self-position to final should be considered, no procedural approaches.</p>	<p>CAS around procedures and approaches/departures will mean consuming large amounts of airspace, which the sponsor does not wish to do. The sponsor has already discussed this with the CAA and know the process to request dispensation from this.</p>
	<p>Freeland Parish Council</p>	<p>Freeland Parish Council does not have any concerns about the design principals however, the Parish Council would like to engage with RAF Brize Norton where any of the design changes overfly any of the Parish boundaries.</p>	<p>If the change in airspace creates increase in civil traffic patterns over Freeland Parish Council, the sponsor will be in touch to discuss.</p>
	<p>Gloucester</p>	<p>Impact on Gloucester IAPs</p>	<p>If the change in airspace impacts on Gloucester IAPs, the sponsor will be in touch to discuss.</p>
	<p>DAATM on behalf of MOD</p>	<p>No concerns, but it might be useful to identify which are non-negotiable and which could be partially met and still be acceptable (must vs should).</p>	<p>This will be considered; however, the Change Sponsor feels this may limit the process.</p>
	<p>Bampton Parish Council</p>	<p>Aircraft routing particularly at night. As in 11 above we do not deem the historic centre of Bampton as a</p>	<p>A meeting to discuss matters has been sent to Bampton Parish Council.</p>

		suitable route as it causes pollution and safety concerns for our population and buildings (particularly those listed buildings where design principles when they were built mean they have no foundations so they shake as your aircraft pass over)	
13. Are there any other DP you would like the MOD to consider?	LOA	Ensure safe integration/coordination of London Oxford Traffic.	The ACP sponsor feels this DP is already covered with DP a and i.
	LOA	Establish the points of failure within the earlier ACP	The ACP sponsor does not believe this to be a DP, as a DP is what drives the design of the airspace. However, will be addressing previous ACP failures throughout the project.
	Lewknor Parish	Engagement - MOD shall engage with other airspace users and other stakeholders particularly but not only NATMAC members and local communities within 30 miles of RAF Brize Norton providing timely feedback	The sponsor is already doing this and intends to carry this on throughout the CAP1616 process, allowing as much transparency as possible.
	Lewknor Parish	Environment - Re-designed airspace will consider the benefits and nuisance effects including but not limited to noise, fuel benefits and fuel disbenefits release of airspace and expansion of CAS	Environmental impacts of displaced civil traffic will be considered. However, the MoD is not required to consider environmental impacts of military aircraft.
	NATS	May we suggest including some environment related DPs. We can suggest the following examples: -Minimise populations overflown if other options would have no adverse impact on MoD activities -Provide high performance and low performance procedures to reduce unnecessary track miles and low level operations for higher performing aircraft	Environmental impacts of displaced civil traffic will be considered. However, the MoD is not required to consider environmental impacts of military aircraft.



	<p>██████ ██████</p>	<p>minimum turn radius for all departures, all approaches and departures needing turns to be restricted to say 210 or 180kts, to ensure a reasonable turn radius not requiring so much airspace.</p>	<p>This ACP is for airspace design only not procedures. However, these comments will be considered for procedure change.</p>
	<p>██████ ██████</p>	<p>You sent us out a multiple page letter which only says ;we want to make changes' That could have been accomplished in a sentence or two! What you haven't said is what you want to do. The most obvious to the residents is to land at greater than 3 degrees to reduce residential noise and to have your training flights at a higher altitude.</p>	<p>The possible change has not been designed yet; this begins to happen in stage 2; multiple these designs options will be pushed out to all stakeholders. The sponsor is following the CAP1616 process and has done the stages as mandated. This ACP is for airspace design only not procedures.</p>
	<p>Swinbrook Parish Council</p>	<ol style="list-style-type: none"> <li>1. Develop and integrated solution with other airspace users</li> <li>2. Minimise the overall impact of the design (which is not necessarily limited to other airspace users)</li> <li>3. And, finally, minimise the impact on the Cotswold Natural Landscape, bearing in mind the purpose of its designation being to conserve &amp; enhance the natural beauty of the area (including its relative tranquillity)</li> </ol>	<p>The sponsor feels point 1 and 2 are covered by DP a, h, and i. The sponsor is also working closely with the CEO of General Aviation, which represents many UK bodies, as described on page ...) and their neighbour London Oxford Airport (LOA).</p>
	<p>General Aviation Alliance (GAA)</p>	<p>"MAC risk will not be exported to other Airspace users." Objective analysis will be used to support this</p>	<p>Safety is the highest priority for the Change Sponsor.</p>
	<p>Bampton Parish Council</p>	<p>Where changes are made they should include everything they can to</p>	<p>The sponsor does not feel this needs to be a DP, it will be a factor the</p>

		minimise the impact on local communities	designers and sponsor consider.
14. Are there any draft DP you would like the MOD to consider removing/rewording?	██████████	Containment – protection of SIDs, IAPs and widebody aircraft should be changed to first ensure SIDs and IAPs comply with modern procedures and continuous descent approaches	This ACP is for airspace design only not procedures. However, these comments will be considered for procedure change.
	NATS	We have provided suggestions against the specific DPs	
	DAATM on behalf of MOD	Possibly DP b. It is not clear why it needs to be a standalone DP.	DP (b) removed.
	General Aviation Alliance (GAA)	Point 2 lacks clarity and needs to be removed. Consider working further to distill the principles into clearer aims.	DP (b) removed.
15. Should the MOD prioritise some design principles ahead of others?	██████████	continuous descent approaches and no fix altitudes below a 3-degree descent path  no procedural approaches should be considered	This ACP is for airspace design only not procedures. However, these comments will be considered for procedure change.
	DAATM on behalf of MOD	Yes, provision of a safe operating environment for all airspace users and facilitation of military operating requirements should be prioritised over all other design principles. Any airspace design ‘must’ achieve these, whereas with the other design principles there is likely to be an element of trade-off between design options.	Safety will remain the sponsor’s highest priority.
	General Aviation Alliance (GAA)	See comment reference Point 10 being given a much higher priority by moving to point 2	Changed to Priority 3.
	NATS	May we suggest Safety related DPs	Safety will remain the sponsor’s highest priority.
16. Would you like any more detail to be	DAATM on behalf of MOD	How do you see FUA being affected?	This will be easier to answer and evidence with each design.

included in the design principles?	Bampton Parish Council	We would like to know what has already been rejected by the MOD and on what grounds	The MoD has not rejected anything themselves. A previous ACP attempt was made but rejected by the CAA on the grounds of complexity of the proposed new airspace and limited evidence for reasoning of change.
	NATS	We have provided suggestions against the specific DPs	
17. Would you like a face to face to discuss specific questions regarding our proposal? If so, please leave contact details.	Gloucester	Yes	Contacted
	General Aviation Alliance (GAA)	The GAA is content to meet at any time in order to facilitate an innovative and collaborative solution. Email: coordairspace@gmail.com	In contacted and working with. Have a good relationship.
	Bampton Parish Council	YES – we used to have regular meetings with base personnel, even during COVID. Now it appears that we have been cut off completely by your personnel as despite continued attempts to make contact we have been ignored and no invitations to meet have been received. We are not technical retired RAF personnel so we would very much like to meet face to face to discuss and fully understand your proposals and other ‘matters of the moment’ including updates to these proposals as they develop.	Contacted and Media and Comms Sqn contacted.
18. Additional Information	██████████ ██████████	I’m a former 777 pilot, regularly flying into LHR where continuous descent approaches with no level segments below 6000ft were the standard every day. I also regularly flew into San Diego where we would do a straight in continuous descent approach from 10000ft plus to a 3.5-degree ILS or RNAV approach with	As stated previously procedures is not part of this ACP but his suggestions will be considered for procedure design.  Added to the distro list.

		<p>no level segments which was easily achievable. The Speedbrake is a normal flight control, not something to be feared and rarely used as seems to be some peoples' thoughts!</p> <p>Please add my name to the stakeholder list, although I responded to the previous two ACPs I don't seem to be on the list. Thanks</p>	
<p>██████ ██████</p>		<p>While I understand that you need to make changes in the airspace you use, I am rather alarmed by large aircraft creating a deafening sound over our home and flying so low they barely miss the top of the trees. Surely they could fly over fields and woods without causing so much disruption to people's lives in their own homes.</p>	<p>The ACP does not look into the routing of aircraft but that of the airspace around the aerodrome. If the individual lives close by, they may find the aircraft having higher, continuous descents and faster climbs creating less noise, unless previously benefitting from noise baffling.</p>
<p>██████████</p>		<p>Regarding the Draft Design Principles for revision of RAF Brize Norton's air space, I notice that minimisation of aircraft noise and low flying impact on the ground based community is conspicuous by its absence. It is essential you include these criteria in your Design Principles.</p>	<p>Environmental impacts of displaced civil traffic will be considered, this includes aircraft noise and low flying. However, the MoD is not required to consider environmental impacts of military aircraft.</p>
<p>Tiddington with Albury Parish Council</p>		<p>Thank you for allowing us the opportunity to comment on the BZN airspace design principles .</p> <p>I am responding on behalf of the Tiddington with Albury Parish Council . Based on the views of parishioners expressed in recent parish Neighbourhood Plan related surveys we would request that any airspace redesign routes large and/or noisy</p>	<p>This ACP is only required to consider the environmental impacts of civil traffic patterns. During procedure design, flight profiles of military airspace will be considered, but the CAA is directed not to take their environmental impact into account in this ACP and the impacts will be investigated.</p>

	<p>aircraft and helicopters taking off and landing away from low altitude overflight of rural villages such as Tiddington and Milton Common in our Parish.</p> <p>Both aircraft travelling to/from BZN regularly overfly our villages at low altitude as do Chinook helicopters and others from RAF Benson .</p>	
NATS	<p>NATS would welcome further discussion as the airspace design evolves and through the normal engagement requirements of the CAP1616 process. There are established mechanisms for this through the Joint Future ATM Development Team (JFADT) which the DAATM lead on behalf of the MOD.</p>	
Buckland Parish Council	<p>The principal question we have is whether the potential changes will increase the volume of flights directly and at lower level over a wider area around Brize including Buckland, if so should this be raised with wider communities and businesses?</p>	<p>CAP1616 requires the ACP sponsor to conduct analysis of changes to civil traffic patterns created by the proposed airspace designs. During this analysis, environmental impacts will be investigated.</p>
Sutton Courtenay Parish Council	<p>Previously the Parish Council has received concerns regarding noise pollution and we are unable to judge from the design principles' document whether the situation will be worse or better than current</p>	<p>If this is a possibility, environmental factors and the impacts will be investigated.</p>

## Raw Stakeholder Engagement

### Word Documents



#### RAF Brize Norton: ACP-2022-040 Design Principles Feedback

##### Section 1

1. Stakeholder – please provide name and organisation



2. Date form Completed  
24/04/2023

##### Section 2 – Design Principles

*Please provide feedback on the design principles*

3. a - Provide a safe environment for all airspace users

*Clearly a priority to us as they fly over our community so need to stay in the sky!*

4. b - Provide a safe operating environment for high-risk military activities.

*As above*

5. c - Must ensure continuation of military and governmental operational activity.

6. d - Should facilitate design using modern navigational technology.

*We would like to understand what the impact is on the local community of the new technology e.g. Radar Masts etc.*

7. e - Conform to the principles of the CAA's Policy for the Design of Controlled Airspace Structures.

8. f - Use standard airspace structure where possible (conformity, simplicity and safety)

9. g - Draw direction from the Airspace Modernisation Strategy.

10. h. -Minimise the impact to other airspace users.

11. i - Use Flexible Use of Airspace (FUA) principles to manage the airspace.

*BPC regularly receive complaints about the use of the airspace above us, in particular using the Church spire as a visual reference point meaning regular overflying and often apparently low flying over the historic centre of the village. We therefore request that in your FUA you remove Bampton Church spire from your list of VRPs and prevent overflying of the centre of the village. This will improve safety,*

*reduce pollution including that caused by noise and improve the quality of life for our parishioners.*

### **Additional Questions**

*A chance to provide additional feedback*

12. What is your biggest concern, if any, about the design principles (DP)?  
*Aircraft routing particularly at night. As in 11 above we do not deem the historic centre of Bampton as a suitable route as it causes pollution and safety concerns for our population and buildings (particularly those listed buildings where design principles when they were built mean they have no foundations so they shake as your aircraft pass over)*

13. Are there any other DP you would like the MOD to consider?

*Where changes are made they should include everything they can to minimise the impact on local communities*

14. Are there any draft DP you would like the MOD to consider removing/rewording?

15. Should the MOD prioritise some design principles ahead of others?

*Safety*

16. Would you like any more detail to be included in the design principles?

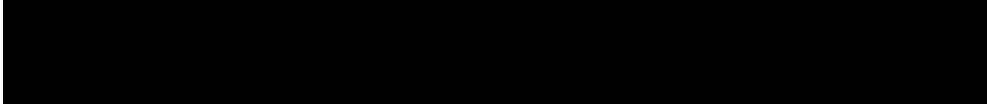
*We would like to know what has already been rejected by the MOD and on what grounds*



17. Would you like a face to face to discuss specific questions regarding our proposal? If so, please leave contact details.

*YES – we used to have regular meetings with base personnel, even during COVID. Now it appears that we have been cut off completely by your personnel as despite continued attempts to make contact we have been ignored and no invitations to meet have been received. We are not technical retired RAF personnel so we would very much like to meet face to face to discuss and fully understand your proposals and other 'matters of the moment' including updates to these proposals as they develop.*

Contact details are:



18. Additional Information



## RAF Brize Norton: ACP-2022-040 Design Principles Feedback

### Section 1

1. Stakeholder – please provide name and organisation

[REDACTED]

2. Date form Completed

16 feb

### Section 2 – Design Principles

*Please provide feedback on the design principles*

3. a - Provide a safe environment for all airspace users

Agreed and this should be achieved by military aircraft flying continuous descent approaches based on modern procedures with no unnecessary low level fixes based on legacy descend to MSA and then fly level for miles in high drag high power high noise configuration. and maximum climb performance departures, together with accurate navigation, thus requiring a much smaller area of low level controlled airspace, which can be freed up as class G airspace for other users and reduce choke points. The airspace should also be designed for normal efficient use, radar vectors or self position to a straight in approach, with a continuous descent not going below a 3 degree descent path. Old fashioned procedural approaches or those descending to MSA and then flying level for miles before the final descent should be practiced in the simulator and not need airspace

4. b - Provide a safe operating environment for high-risk military activities.

these military activities should not be high risk!

All the military aircraft can fly normal self position or radar vectored approaches to an ILS or RNAV final approach, they are all well capable of continuous descent approaches and many of them can do steeper approaches than conventional airliners.

The currently drawn approaches descending to MSA miles away and flying level are less safe so this risk should be mitigated by flying continuous descent approaches

5. c - Must ensure continuation of military and governmental operational activity.

yes, but the airspace should be for following modern continuous descent approaches, or higher rate of descent tactical approaches. Learning old style procedures can easily be done in the simulator as can most training that would requires large chunks of low level airspace.

6. d - Should facilitate design using modern navigational technology.

Yes, modern navigation is much more accurate and has been proven in airline operation worldwide. this would allow controlled airspace to be smaller. But as important is to ensure the procedures are designed correctly so there are no unnecessary low level fixes. The previous ACP had a RNAV approach to the easterly runway with an IAF at something like 1700ft or above, about 14 miles from the threshold. A point where a professionally flown approach would be at approx 4300ft. Thus the base of the proposed airspace was 2000ft too low just to protect that IAF, when no aircraft should be anywhere near that low!

7. e - Conform to the principles of the CAA's Policy for the Design of Controlled Airspace Structures.

Only if the CAA principals have been updated to use radar vectors or self position to final approach with a continuous descent approach and all fixes to be at or above where a 3 degree descent path would be. No low level fixes based on MSA and no level segments. They should also be designed based on max climb performance and minimum turning circle, which might need holding the speed back to 180 or 210kts as commonly used, not accelerating to 250kts until the turn is completed. Airspace should also be designed based on modern navigation accuracy and 500ft vertical separation minimums.

8. f - Use standard airspace structure where possible (conformity, simplicity and safety)

yes, but based on modern approach and departure procedures. and Yes Class D where absolutely necessary and the rest returned to class G with no other constraints. they should also use ICAO standard not UK gold plated versions.

9. g - Draw direction from the Airspace Modernisation Strategy.

yes, no more airspace based on 1970s and earlier approach procedures and climb performance of an Avro York on 2 engines!

10. h. -Minimise the impact to other airspace users.

Absolutely, much of the current lower airspace in the class D is not required for the transport missions. Design the airspace around updated modern procedures and for real operational use, not legacy procedures and not for training that can be done much cheaper in the simulator.

11. i - Use Flexible Use of Airspace (FUA) principles to manage the airspace.

yes, the maximum amount of airspace should be returned to class G. ATC should also be able to release other airspace to class G when its not being used. some of this could be done by having an automatic message on the frequency when someone calls up if there is no ATC present which would say the airspace is not operational and is returned to class G. This is done at many military airfields in France and works well- usually you arent allowed below 1000ft in the ATZ but thats the only restriction.

---

## Additional Questions

### *A chance to provide additional feedback*

**12. What is your biggest concern, if any, about the design principles (DP)?**

my biggest concern is that the design principals will be based on containing the current poorly designed approach procedures with low level fix altitudes requiring much lower base of airspace than really necessary.

similarly as well as far too low Fix altitudes, many of the procedures are based on low level holds and procedural approaches, these should not be considered.

The first job must be to re-write the approach procedures to ensure there are no fixes below a 3 degree continuous descent path and only radar vectors or self position to final should be considered, no procedural approaches.

**13. Are there any other DP you would like the MOD to consider?**

minimum turn radius for all departures, all approaches and departures needing turns to be restricted to say 210 or 180kts, to ensure a reasonable turn radius not requiring so much airspace.

**14. Are there any draft DP you would like the MOD to consider removing/rewording?**

Containment – protection of SIDs, IAPs and widebody aircraft

should be changed to first ensure SIDs and IAPs comply with modern procedures and continuous descent approaches

**15. Should the MOD prioritise some design principles ahead of others?**

continuous descent approaches and no fix altitudes below a 3 degree descent path

no procedural approaches should be considered

**16. Would you like any more detail to be included in the design principles?**

**17. Would you like a face to face to discuss specific questions regarding our proposal? If so, please leave contact details.**



**18. Additional Information**

Im a former 777 pilot, regularly flying into LHR where continuous descent approaches with no level segments below 6000ft were the standard every day. I also regularly flew into San Diego where we would do a straight in continuous descent approach from 10000ft plus to a 3.5 degree ILS or RNAV approach with no level segments which was easily achievable. The Speedbrake is a normal flight control, not something to be feared and rarely used as seems to be some peoples thoughts!

Please add my name to the stakeholder list, although I responded to the previous two ACPs I dont seem to be on the list. Thanks

## RAF Brize Norton: ACP-2022-040 Design Principles Feedback

### Section 1

1. Stakeholder – NATS
2. 27<sup>th</sup> April 2023

### Section 2 – Design Principles

*Please provide feedback on the design principles*

3. a - Provide a safe environment for all airspace users  
*May we suggest combining DPs A and B; Provide a safe environment for all users*
4. b - Provide a safe operating environment for high-risk military activities.  
*Please can you clarify what is meant by High Risk Military activities The description of the aircraft types doesn't suggest any high energy manoeuvres, may we suggest (if DPa and DPb are not combined) you amend the DP to read "Provide a safe operating environment for related military activities"*
5. c - Must ensure continuation of military and governmental operational activity.  
*We do not believe this statement is recognised as a design principle. Suggest this is removed as we believe this is already captured in the covering letter*
6. d - Should facilitate design using modern navigational technology.  
*May we suggest a change, for clarity, to the title "The airspace design should enable the use of modern navigation equipment and procedures".*
7. e - Conform to the principles of the CAA's Policy for the Design of Controlled Airspace Structures.  
*May we suggest amending the title of this DP to something like Reasonable endeavours to conform to the principles of CAA Policy for the Design of CAS structures*
8. f - Use standard airspace structure where possible (conformity, simplicity and safety)  
*Propose amending standard to standardised*
9. g - Draw direction from the Airspace Modernisation Strategy.  
*May we suggest changing the DP from Draw direction from AMS to Align with the AMS*
10. h. -Minimise the impact to other airspace users.  
*No comment*
11. i - Use Flexible Use of Airspace (FUA) principles to manage the airspace.  
*No comment*

*A chance to provide additional feedback*

12. What is your biggest concern, if any, about the design principles (DP)?  
No Comment
13. Are there any other DP you would like the MOD to consider?  
May we suggest including some environment related DPs. We can suggest the following examples:
  - Minimise populations overflow if other options would have no adverse impact on MoD activities
  - Provide high performance and low performance procedures to reduce unnecessary track miles and low level operations for higher performing aircraft
14. Are there any draft DP you would like the MOD to consider removing/rewording?  
We have provided suggestions against the specific DPs
15. Should the MOD prioritise some design principles ahead of others?  
May we suggest Safety related DPs
16. Would you like any more detail to be included in the design principles?  
We have provided suggestions against the specific DPs
17. Would you like a face to face to discuss specific questions regarding our proposal? If so, please leave contact details.  
NATS would welcome further discussion as the airspace design evolves and through the normal engagement requirements of the CAP1616 process. There are established mechanisms for this through the Joint Future ATM Development Team (JFADT) which the DAATM lead on behalf of the MOD.
18. Additional Information  
No further comment

## RAF Brize Norton: ACP-2022-040 Design Principles Feedback

### Section 1

1. Stakeholder – please provide name and organisation  
**Gloucestershire Airport**

2. Date form Completed

**06/02/2023**

### Section 2 – Design Principles

*Please provide feedback on the design principles*

3. a - Provide a safe environment for all airspace users

*Gloucester agree in principle*

4. b - Provide a safe operating environment for high-risk military activities.

*Segregation of military vs civil air systems is prudent especially where Air Defence is a prominent exercise. However, not at the detriment of unusable or inappropriate excessive portions of controlled airspace.*

5. c - Must ensure continuation of military and governmental operational activity.

*No comment*

6. d - Should facilitate design using modern navigational technology.

*Gloucester agree*

7. e - Conform to the principles of the CAA's Policy for the Design of Controlled Airspace Structures.

*Gloucester agree on the basis this will ensure transparency to all stakeholders*

8. f - Use standard airspace structure where possible (conformity, simplicity and safety)

*Gloucester agree, on the basis that options are presented as to the classification of the airspace suggested and the intended availability of flexible use by other airspace users.*

*Confusing and uncommon dimensions and classification of airspace leads to incursions and or pilots avoiding areas discouraging them to call ATC and create synthetic AIAA's*

9. g - Draw direction from the Airspace Modernisation Strategy.

*Gloucester agree.*

10. h. -Minimise the impact to other airspace users.

*Gloucester agree*

11. i - Use Flexible Use of Airspace (FUA) principles to manage the airspace.



*Gloucester agrees. However, suggest the FUA times and dates active kept simple. le active Mon-Fri 0900-1700 and avoid variation and exceptions to this.*

### **Additional Questions**

*A chance to provide additional feedback*

12. What is your biggest concern, if any, about the design principles (DP)?

Impact on Gloucester IAPs

13. Are there any other DP you would like the MOD to consider?

No

14. Are there any draft DP you would like the MOD to consider removing/rewording?

No

15. Should the MOD prioritise some design principles ahead of others?

No comment

16. Would you like any more detail to be included in the design principles?

No comment

17. Would you like a face to face to discuss specific questions regarding our proposal? If so, please leave contact details.

Yes

18. Additional Information



Ministry  
of Defence

## RAF Brize Norton: ACP-2022-040 Design Principles Feedback

### Section 1

1. Stakeholder – please provide name and organisation  
[REDACTED] Parish Clerk  
Freeland Parish Council
2. Date form Completed  
06 Feb 23

### Section 2 – Design Principles

*Please provide feedback on the design principles*

3. a - Provide a safe environment for all airspace users  
N/A
4. b - Provide a safe operating environment for high-risk military activities.  
N/A
5. c - Must ensure continuation of military and governmental operational activity.  
N/A

6. d - Should facilitate design using modern navigational technology.  
N/A

7. e - Conform to the principles of the CAA's Policy for the Design of Controlled  
Airspace Structures.  
N/A

8. f - Use standard airspace structure where possible (conformity, simplicity and  
safety)  
N/A

9. g - Draw direction from the Airspace Modernisation Strategy.  
N/A

10. h. -Minimise the impact to other airspace users.  
N/A

11. i - Use Flexible Use of Airspace (FUA) principles to manage the airspace.  
N/A

### **Additional Questions**

*A chance to provide additional feedback*

12. What is your biggest concern, if any, about the design principles (DP)?

Freeland Parish Council does not have any concerns about the design principals however, the Parish Council would like to engage with RAF Brize Norton where any of the design changes overfly any of the Parish boundaries.

13. Are there any other DP you would like the MOD to consider?

N/A

14. Are there any draft DP you would like the MOD to consider removing/rewording?

N/A

15. Should the MOD prioritise some design principles ahead of others?

N/A

16. Would you like any more detail to be included in the design principles?

N/A

17. Would you like a face to face to discuss specific questions regarding our proposal? If so, please leave contact details.  
Not [at this time.](#)

18. Additional Information  
N/A



## RAF Brize Norton: ACP-2022-040 Design Principles Feedback

### Section 1

1. Stakeholder – please provide name and organisation

[REDACTED] – DAATM on behalf of MOD

2. Date form Completed

6 Apr 2023

### Section 2 – Design Principles

*Please provide feedback on the design principles*

3. a - Provide a safe environment for all airspace users

Agree that this is top priority and should be a 'must' design principle.

4. b - Provide a safe operating environment for high-risk military activities.

I'm not sure that this needs to be split out into a separate DP rather than being captured within a and c.

5. c - Must ensure continuation of military and governmental operational activity.

Agree that this is high priority and should be a 'must' design principle.

6. d - Should facilitate design using modern navigational technology.

Agree.

7. e - Conform to the principles of the CAA's Policy for the Design of Controlled Airspace Structures.

Agree.

f - Use standard airspace structure where possible (conformity, simplicity and safety)

Agree.

8. g - Draw direction from the Airspace Modernisation Strategy.

Agree.

9. h. -Minimise the impact to other airspace users.

Agree.

10. i - Use Flexible Use of Airspace (FUA) principles to manage the airspace.

This will likely become more relevant and effective as technological advances towards a digitised aviation environment enable dynamic activation/deactivation of airspace. In the meantime, enabling access will be important.

### **Additional Questions**

*A chance to provide additional feedback*

11. What is your biggest concern, if any, about the design principles (DP)?

No concerns, but it might be useful to identify which are non-negotiable and which could be partially met and still be acceptable (must vs should).

12. Are there any other DP you would like the MOD to consider?

No

13. Are there any draft DP you would like the MOD to consider removing/rewording?

Possibly DP b. It is not clear why it needs to be a standalone DP.

14. Should the MOD prioritise some design principles ahead of others?

Yes, provision of a safe operating environment for all airspace users and facilitation of military operating requirements should be prioritised over all other design principles. Any airspace design 'must' achieve these, whereas with the other design principles there is likely to be an element of trade-off between design options.



15. Would you like any more detail to be included in the design principles?

How do you see FUA being effected?

16. Would you like a face to face to discuss specific questions regarding our proposal? If so, please leave contact details.

No

17. Additional Information

## Forms

These individuals responded using the form. Responses were automatically populated into an excel spreadsheet and have been put into the below tables.

### Design Principles

			<b>for General Aviation Alliance (GAA)</b>
<b>a - Provide a safe environment for all airspace users</b>			Agreed and Sensible. This point covers all safety desires enhancements and potential outcomes. A clear aim that does not require further explanation.
<b>b - Provide a safe operating environment for high-risk military activities.</b>			Infers that military activities are taking place such as live firing etc. If as I suspect you mean the movement of personnel by aircraft, then the present operation by definition is safe. Point 3.a covers this operation. Further, such a statement could be misconstrued as lacking in honesty and it's understood that is absolutely not your intention
<b>c - Must ensure continuation of military and governmental operational activity.</b>			Do you really need this as a principle? The ACP won't change this existing activity which is conducted by Brize AS. Such activity will continue whether or not change takes place.
<b>d - Should facilitate design using modern navigational technology.</b>			Agreed, but see below
<b>e - Conform to the principles of the CAA's Policy for the Design of Controlled Airspace Structures.</b>			GAA does not support the existing CAA containment policy which is disproportionate in its application. It will de-facto lead to an airspace volume that will not satisfy the needs of other airspace users. As a result a better innovative solution will be required that will be at odds with this principle.
<b>f - Use standard airspace structure where possible (conformity, simplicity and safety)</b>			See above and remove "where possible". A principle, like an aim should be direct.
<b>g - Draw direction from the Airspace Modernisation Strategy.</b>			Requires a firmer statement. AMS is THE guide with regard to the principle of new airspace.
<b>h. -Minimise the impact to other airspace users.</b>			This should be point 2. The tenant of this principle is very much welcomed.
<b>i - Use Flexible Use of Airspace (FUA) principles to manage the airspace.</b>			It's important to explain what is meant by this principle and how you propose delivery.

## Additional Questions

			<i>Captain SC Noujaim for General Aviation Alliance (GAA)</i>
<b>What is your biggest concern, if any, about the design principles (DP)?</b>	You sent us out a multiple page letter which only says ;we want to make changes' That could have been accomplished in a sentence or two! What you haven't said is what you want to do. The most obvious to the residents is to land at greater than 3 degrees to reduce residential noise and to have your training flights at a higher altitude.		
<b>Are there any other DP you would like the MOD to consider?</b>			"MAC risk will not be exported to other Airspace users." Objective analysis will be used to support this
<b>Are there any draft DP you would like the MOD to consider removing/rewording?</b>			Point 2 lacks clarity and needs to be removed. Consider working further to distill the principles into clearer aims.
<b>Should the MOD prioritise some design principles ahead of others?</b>			See comment reference Point 10 being given a much higher priority by moving to point 2
<b>Would you like any more detail to be included in the design principles?</b>			Not at this time
<b>Would you like a face-to-face meeting to discuss specific questions regarding our proposal? If so, please leave contact details.</b>			The GAA is content to meet at any time in order to facilitate an innovative and collaborative solution. Email: [REDACTED]
<b>Additional Information</b>		Previously the Parish Council has received concerns regarding noise pollution and we are unable to judge from the design principles' document whether the situation will be worse or better than current.	Nil

## Emails and Attaching Documentation

**From:** [REDACTED]  
**Sent on:** Friday, February 10, 2023 7:16:36 PM  
**To:** BZN-TATCCS-ACP (MULTIUSER) <BZN-TATCCS-ACP@mod.gov.uk>  
**CC:** Lewknor Parish [REDACTED]  
**Subject:** ACP-2022-040  
**Attachments:** Draft Design Principles ACP-2022-040.docx (11.97 KB)

Thank you for your e-mail regarding the title airspace change. I would like to provide feedback as you have requested.

I am a parish councillor at Lewknor Civil parish and we are situated just outside the RAF Benson MATZ to the north.

I was somewhat disappointed with your document describing the Design Principles you are proposing to use for the changes to the BZN airspace. However, I do believe the airspace has been in need of updating for very many years.

I have attached my thoughts on the design principles you have proposed. I think the principles you have proposed are not properly supported by the rationale in the table on page 2 of your document.

I have attached a suggested format and a slightly modified rationale in some cases. I have also combined a small number of your DPs and added a couple. I fully support the need and urgency to get the change in place.

Lewknor has many airspace users in our sky with Benson helicopters, Booker pilot training and aerobatic training aircraft from both Booker and White Waltham. We also get a number of Hot Air balloons particularly in the summer.

We would like to continue our engagement if you agree it is appropriate. My contact details are:

[REDACTED]  
[REDACTED]

I will be out of the country from tomorrow until 25th February but will have e-mail access

Kind regards

[REDACTED]

*Email Attachment*

<b>DP</b>		<b>Description</b>	<b>Rationale</b>
DP0	GOLD	Safety shall always be the highest priority	Various themes of safety may be considered in design principles, but safety as a concept is a fundamental requirement in aviation
DP1	High	Continuation of government and military operations including high risk activity is paramount	The design of new airspace structures shall permit the operation of high risk military operations, the continuance of RAF Brize Norton current commitments and identified potential future activities
DP2	High	Modernisation to facilitate to minimise pilot and controller workload	The intent of this principle is, by design, achieve the maximum reduction of controller tactical intervention
DP3	High	Conform to the requirements of CAP1616	The design of new airspace structures shall comply with the CAA requirements, however, where it is identified that this will impinge on operational needs a detailed mitigation shall be produced
DP4	High	Airspace Structure	It is imperative that any re-designed airspace complies with existing design standards and does not increase complexity. Any airspace released shall be usable to the wider airspace users
DP5	High	The exiting principle of Flexible Use of Airspace (FUA) shall be applied	The re-design of airspace shall be achieved in such a way to make airspace available to the greatest extent possible with minimum restrictions
DP6	High	Engagement	MOD shall engage with other airspace users and other stakeholders particularly but not only NATMAC members and local communities within 30 miles of RAF Brize Norton providing timely feedback
DP7	Medium	Environment	Re-designed airspace will consider the benefits and nuisance effects including but not limited to noise, fuel benefits and fuel disbenefits release of airspace and expansion of CAS

**From:** [REDACTED]

**Sent on:** Wednesday, March 15, 2023 4:13:36 PM

**To:** [REDACTED]

**CC:** Buckland Clerk [REDACTED]

**Subject:** RE: 20230201-BZN\_ACP\_Design\_Principles-O

Dear [REDACTED]

Thank you for consulting with us on this.

I am chair of Buckland Parish Council we are approx. 7 miles south east of Brize.

None of us on the parish council feels qualified to reply in the format that you have requested as the specific areas that you highlight for consultation appear very technical.

The principal question we have is whether the potential changes will increase the volume of flights directly and at lower level over a wider area around Brize including Buckland, if so should this be raised with wider communities and businesses?

Apologies for a very simplistic response to a very complex set of potential proposals!

Regards, [REDACTED]

[REDACTED]

**Brookshire Capital LLP**

[REDACTED]

[REDACTED]

**From:** [REDACTED]

**Sent on:** Tuesday, March 7, 2023 10:04:40 AM

**To:** BZN-TATCCS-ACP (MULTIUSER) <BZN-TATCCS-ACP@mod.gov.uk>

**Subject:** ACP-2022-040

MoD:

Regarding the Draft Design Principles for revision of RAF Brize Norton's air space, I notice that minimisation of aircraft noise and low flying impact on the ground based community is conspicuous by its absence. It is essential you include these criteria in your Design Principles.

Regards,

[REDACTED]

**From:** [REDACTED]  
**Sent on:** Saturday, March 11, 2023 4:01:47 PM  
**To:** BZN-TATCCS-ACP (MULTIUSER) <BZN-TATCCS-ACP@mod.gov.uk>  
**CC:** [REDACTED]  
**Subject:** Airspace change proposal

Dear Sir/Madam,

While I understand that you need to make changes in the airspace you use, I am rather alarmed by large aircraft creating a deafening sound over our home and flying so low they barely miss the top of the trees. Surely they could fly over fields and woods without causing so much disruption to people's lives in their own homes.

I look forward to hearing from you,

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Sent from my iPhone



**From:** [REDACTED]

**Sent on:** Monday, March 6, 2023 10:03:27 PM

**To:** [REDACTED]  
BZN-TATCCS-ACP (MULTIUSER) <BZN-TATCCS-ACP@mod.gov.uk>

**Subject:** BZN Airspace consultation

Good evening [REDACTED]

Thank you for allowing us the opportunity to comment on the BZN airspace design principles .

I am responding on behalf of the Tiddington with Albury Parish Council . Based on the views of parishioners expressed in recent parish Neighbourhood Plan related surveys we would request that any airspace redesign routes large and/or noisy aircraft and helicopters taking off and landing away from low altitude overflight of rural villages such as Tiddington and Milton Common in our Parish.

Both aircraft travelling to/from BZN regularly overfly our villages at low altitude as do Chinook helicopters and others from RAF Benson .

Regards

[REDACTED]  
[REDACTED]

**From:** [REDACTED]

**Sent:** 27 January 2023 15:05

**To:** [REDACTED]

**Subject:** RE: 20230123-ACP\_DP-O

Hi [REDACTED]

Please find attached. We have added two more rows as 'j' and 'k' for your consideration (in red).

You may also wish to refer to the CAA's Airspace Modernisation strategy, see attached email, as this might impact all Class G operations talking about ceasing UK FIS and replacing with ICAO FIS; see particularly CAP1711 Page 71 "Use case 2: Air traffic service provision" and CAP1711a Pages 19-22 "UK-ABN/4. Integration" (especially page 20). We are awaiting a response from the CAA to a letter sent to the CAA on this issue last year prior to these updated CAPs being published on Monday.

Kind Regards,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

*Attachments*

<b>J</b>	<b>Ensure safe integration/coordination of London Oxford Traffic.</b>	<b>An integrated design enables a safe and expeditious routing of all traffic.</b>
<b>k</b>	Establish the points of failure within the earlier ACP	Address all of the issues raised by the CAA, establishing revised principals and a road map to success

## Refreshed Airspace Modernisation Strategy

Modernisation of UK airspace, delivering quicker, quieter and cleaner journeys, is long overdue. Today, the CAA is publishing a refreshed [Airspace Modernisation Strategy](#), bringing it up to date and widening its scope, in particular:

- to extend the strategy out to 2040
- to maintain and, where possible, improve the UK's high levels of aviation safety
- to focus on integrating all airspace users with simpler airspace design and supporting regulations
- to introduce environmental sustainability as an overarching principle across all modernisation activities
- to align with the ICAO Global Air Navigation Plan and provide a clear strategic path for rulemaking, now the UK has left the EU and EASA.

Read the [Airspace Modernisation Strategy](#).

SW2023/10

**Categories:** Airspace Change