

London Oxford Airport ACP - Proposal for Revised Airspace and Instrument Flight Procedures

CAP 2087



Documents

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Contents

Contents	3
Chapter 1	5
Executive summary	5
Objective of the Proposal	5
Summary of the decision made	5
Chapter 2	6
Decision Process and Analysis	6
CAA's Role	6
Aims and Objectives of the proposed change – CAA decision on objective	6
Chronology of Proposal Process	7
Framework Briefing	7
Process	8
Consultation	8
Submission of Airspace Change Proposal and supporting documents.	9
Documents considered by the CAA	9
CAA Analysis of the Material provided	10
CAA assessment and decision in respect of Consultation	12
CAA Consideration of Factors material to our decision whether to approve the change	14
Explanation of statutory duties	14
Conclusions in respect of safety	15
Conclusions in respect of securing the most efficient use of airspace	16
Conclusions in respect of taking into account the Secretary of State's guidance to the CAA on environmental objectives	18
Conclusions in respect of aircraft operators and owners	21

Conclusions in respect of the interests of any other person	22
Integrated operation of ATS	22
Interests of national security	23
International obligations	23
Chapter 3.....	24
CAA's Regulatory Decision	24
Annex A.....	26
Conditions	26
Annex B.....	27
Diagrams relating to change	27
Annex C.....	28
The CAA's role in airspace change decisions, the legal framework, the policy background and relevant UK international obligations	28
The seven-stage process of an airspace change	32
Annex D.....	35
UK's International Obligations relating to Performance-Based Navigation.....	35
Annex E.....	36
Glossary	36

Chapter 1

Executive summary

Objective of the Proposal

1. London Oxford Airport (LOA) is seeking to introduce new RNAV (derived from aRea NAVigation) Global Navigation Satellite System (GNSS) arrival and missed approach procedures, while introducing new airspace (a Transponder Mandatory Zone (TMZ)) to contain and protect those procedures. The airspace and procedures also aim to satisfactorily deconflict these procedures from both Royal Air Force (RAF) Brize Norton (BZN) and other airspace users in the Oxford Area of Intense Air Activity (AIAA). The Airspace Change Proposal (ACP) was submitted on 23 July 2020.

Summary of the decision made

2. The CAA has considered the submitted material and **has decided not to approve the ACP**, for reasons including that the proposal does not make a compelling case for the creation of a TMZ, the proposal shows a misinterpretation of the TMZ rules and that the proposal does not adequately resolve the integration issues with BZN. Furthermore, the CAA has concluded that the final proposal is significantly different from the option presented as the preferred option during consultation, and that further consultation should have been undertaken with stakeholders to better assess the impacts of this final proposal.

Chapter 2

Decision Process and Analysis

CAA's Role

The CAA's role in airspace change decisions, the legal framework, the policy background and relevant UK international obligations

3. It is necessary to understand the CAA's role in airspace change decisions, the legal framework, the policy background and relevant UK international obligations in order to understand the decision the CAA has taken.
4. This information is set out in [Annex C].

Aims and Objectives of the proposed change – CAA decision on objective

5. The proposed change, its justifications and objectives are set out in full in the Sponsor's documents submitted to the CAA and are published on the CAA's website. The proposal is to implement a TMZ to contain new RNAV (GNSS) procedures. The proposal is seeking to achieve the following aims:
 - a. Create a 'known traffic environment' to enhance the safety of Instrument Flight Rules (IFR) aircraft arriving at LOA from the north to Runway 19 and minimise the number of instances where avoiding action or break-off instructions have an adverse effect on cockpit and controller workload.
 - b. Improve the interactions between BZN and LOA flight procedures. The existing procedures are complex, and this creates a more intensive workload for aircrews and Air Traffic Controllers (ATCOs) at both airfields.
 - c. A requirement to future-proof the existing Instrument Flight Procedures (IFPs) in accordance with CAA Airspace Modernisation Strategy (AMS).

6. It is proposed that this will be achieved through the following objectives:
 - a. The introduction of RNAV (GNSS) approach procedures.
 - b. The introduction of a new airspace structure (TMZ) to protect the new procedures.
 - c. A revised Concept of Operations (CONOPs) Letter of Agreement (LoA) to define the procedures used between LOA and BZN within their common area of interest.

Chronology of Proposal Process

Framework Briefing

7. A Framework Briefing took place at CAA House, London on 23 June 2015. During this, LOA outlined its proposal, the options considered and preferred option to introduce a Radio Mandatory Zone (RMZ) around LOA and new RNAV procedures.
8. The CAA emphasised the need for a collaborative approach, in particular with BZN, aviation stakeholders, and that a 'holistic' approach to any airspace design should be adopted. It added that any potential 'restriction' to local flight operations was likely to be strongly contested by the General Aviation Alliance (GAA), Light Aircraft Association (LAA) and British Gliding Association (BGA) communities, albeit there was support from on-airport General Aviation (GA) operators. It was also made clear that any justification of additional airspace would require robust statistical evidence.
9. It was stated that revised or new Letters of Agreement (LoAs) or Memorandums of Understanding (MoUs) with neighbouring aerodromes and regional aviation organisations would be required to mitigate any possible effects of new airspace design.
10. The CAA pointed out that it would need to be clearly stated that there are 2 ACPs running in parallel with each other and that transparency of the project to

the public was required and the scale of any impacts might mean that non-aviation stakeholders would need to be consulted in greater depth.

11. LOA outlined the environmental impacts of their proposal and the CAA highlighted that the impact would be dependent on any new IFPs and the size and nature of the airspace required. The CAA indicated that the impact to the environment and any noise related changes would need to be clearly articulated within the Consultation documentation.
12. It was agreed that to meet target timelines for Formal Consultation, LOA was required to decide as soon as possible on its airspace requirements, and that the design work should include input from local aviation stakeholders.
13. The sponsor provided an ACP timeline which indicated a target decision date of the end of October 2016. Due to a number of factors, not least the difficulty associated with coordinating airspace design development for the two neighbouring airfields, the initial proposed ACP timeline was re-evaluated and extended.

Process

14. Notwithstanding that the CAA introduced a new airspace change process on 2 January 2018 (known as CAP 1616) this ACP has been developed and is assessed in accordance with the CAA's airspace change process known as CAP 725. This is in accordance with a transition policy developed with the Department for Transport and consulted on in 2016 and 2017¹.

Consultation

15. A public consultation commenced on 15 December 2017 and closed on 5 April 2018. The consultation document² was emailed to 758 organisations and individuals including the Ministry of Defence (MoD), local airport operators, local aerodromes, aviation organisations, local authorities, and town and parish councils. National bodies such as the GAA, British Microlight Aircraft Association (BMAA) and National Air Traffic Services (NATS) were represented

¹ Letter from Acting Head of Aviation Policy Division, Aviation Directorate, DfT to Chief Executive, CAA entitled Military Environmental Impacts in Airspace Changes dated 21 December 2016.

² Available on the CAA website [London Oxford Airport consultation document](#)

through the National Air Traffic Management Advisory Committee (NATMAC). The consultation document was made available for general distribution online through LOA's website and two stakeholder drop-in events were facilitated. Pre-consultation engagement was conducted with some aviation stakeholders including the MoD, the BGA and some local airfields.

16. A total of 66 responses from the original 758 stakeholders targeted, and an additional 1641 responses from individual members of the GA community and other parties were received³.

Submission of Airspace Change Proposal and supporting documents.

17. On 23 July 2020 the CAA received the formal ACP submission. This included the ACP Safety Case Parts 1 and 2, the Consultation Data, consolidated Stakeholder Engagement Log, a consolidated BZN/LOA Consultation Responses Log and Draft LoA between BZN and LOA. Additionally, copies of all correspondence sent to consultees by the Sponsor and responses received by the Sponsor from consultees were provided.

Documents considered by the CAA

18. In assessing the proposal and making this decision, the CAA has taken account of:
 - a. London Oxford Airport ACP Formal Submission; 23 July 2020; Issue 1.
 - b. Safety Case Part 1, dated 23 July 2020; Issue 1.
 - c. Safety Case Part 2, dated 23 July 2020; Issue 1.
 - d. Proposal for Revised Airspace and Instrument Flight Procedures; dated 23 July 2020.
 - e. Consultation Feedback Report; dated 26 October 2018.
 - f. Consultation document; 15 December 2017.

³ Available on the CAA website [London Oxford Airport consultation feedback report](#)

- g. Consultation responses.
- h. Consolidated Stakeholder Engagement Log and consultation responses log.
- i. Oxford RAUWG Minutes for meeting held 14 November 2018.
- j. Stakeholder engagement event presentation; 13 November 2019.
- k. Meeting notes from Stakeholder event held 13 November 2019.
- l. Raw data submitted by LOA including stakeholder consultation responses received by email/letter, LOA outgoing and incoming email correspondence and website pages.
- m. Stakeholder correspondence received by the CAA direct.
- n. London Oxford Airport Operational Assessment.
- o. London Oxford Airport Consultation Assessment.
- p. London Oxford Airport Environmental Assessment.

CAA Analysis of the Material provided

19. As a record of our analysis of this material the CAA has produced:
- a. An **Operational Assessment** which is designed to brief the decision maker whether the proposal is fit for purpose. This assessment contains:
 - b. The CAA's assessment of the airspace change proposal justification and options considered.
 - c. The CAA's assessment of the proposed airspace design and its associated operational arrangements. An assessment of the design proposal is produced to illustrate whether it meets CAA regulatory requirements regarding international and national airspace and procedure design requirements and whether any mitigations were required to overcome design issues.

- d. The CAA's assessment of whether adequate resource exists to deliver the change and whether adequate communications, navigation and surveillance infrastructure exists to enable the change to take place.
- e. The CAA's assessment of whether maps and diagrams explain clearly the nature of the proposal.
- f. The CAA's assessment of the operational impacts to all airspace users, airfields and on traffic levels and whether potential impacts have been mitigated appropriately.
- g. The CAA's conclusions are arrived at after a CAA Case Study. An Operational Assessment is completed for all airspace change proposals and forms a key part in the CAA's decision-making process as to whether a proposal is approved or rejected. The Operational Assessment will also include any recommendations for implementation such as conditions that should be attached to an approval, if given.
- h. An **Environmental Assessment** which reviews the Environmental Assessment provided by the sponsor requesting the change. The review assesses whether the sponsor has provided the data and information that had been agreed at the Framework Briefing or in subsequent correspondence and must be provided as part of the proposal. The requirements are based on the guidance in CAP 725. Those requirements have been designed to facilitate the assessments that the CAA must make when considering the environmental impact of the change. The CAA reviews the assessments made by the sponsor as part of the proposal to determine if they have been undertaken properly and the conclusions are reasonable. The CAA will check a sample of the sponsor's results and may, in some cases, undertake its own analysis. The CAA then prepares a report summarising the environmental impacts of the proposal outlining the anticipated impacts of the change if it were to be implemented, for consideration along with all the other material by the CAA decision maker.

- i. A **Consultation Assessment** designed to brief the CAA decision maker on whether the proposal has been adequately consulted upon in accordance with the CAA's regulatory requirements, the Government's guidance principles for consultation and the Secretary of State for Transport's Air Navigation Guidance. The assessment will confirm whether the change sponsor has correctly identified the issues arising from the consultation and has responded to those issues appropriately. The assessment will rely, in part, on a comparison of the sponsor's consultation feedback report against the actual responses provided by consultees.

CAA assessment and decision in respect of Consultation

20. LOA planned to conduct their consultation between 15 December 2017 and 22 March 2018. The consultation commenced on 15 December 2017, but the length of the consultation was extended by two weeks to align with the timing of the separate but related BZN consultation which was itself being extended. The consultation closed on 5 April 2018. The time extension provided a total continuous consultation length of sixteen weeks.
21. The raw response data has been checked against the conclusions outlined in the sponsor's consultation feedback report. The sponsor has adequately identified the key themes from their consultee feedback, and these have been accurately outlined in the consultation feedback report. Ninety-seven percent of stakeholders who responded to the consultation objected to the proposals and the highest proportion of objections were received from individuals within the general aviation community. Seventeen stakeholders (1.0%) supported the proposals.
22. The CAA has made the following assessment of the consultation:
 - a. The consultation took place when the proposal was at a formative stage. The consultation document stated that wherever possible the sponsor would strive to minimise any adverse impacts by design before submitting