

Airspace Change Decision

BRIZE NORTON CLASS D CTR/CTA

CAP 2089

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Executive summary

Objective of the Proposal

1. Royal Air Force (RAF) Brize Norton (BZN) is seeking to introduce additional volumes of Controlled Airspace (CAS) to facilitate direct connectivity with the national airways structure, to provide better containment of instrument approach procedures and to reduce the need for often complex and time-consuming coordination between BZN and London Oxford Airport (LOA) Air Traffic staffs to integrate instrument traffic to respective aerodromes.

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 and safe case for the creation of these new blocks of CAS and that the proposal does not adequately resolve the integration of IFP with LOA. Furthermore, the CAA has concluded that the airspace design included in 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 all stakeholders to better record and assess the impacts of this final proposal.

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[s] 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 seeking to achieve the following aims:
 - a. Reduce the risk of a mid-air collision between a BZN based aircraft and a General Aviation (GA) aircraft within 20 nautical miles of BZN.
 - b. To introduce new procedures in a way that enables the UK to meet its international obligations whereby all new instrument flight procedures are designed to an ICAO standard aRea NAVigation (RNAV) specification.
 - c. To reduce the requirement for complex interaction between BZN Air Traffic Control (ATC) staff and LOA ATC staff to effect coordination between instrument approaches.
6. It is proposed that this will be achieved through the following objectives:
 - a. Introduction of additional volumes of Class D airspace, combined Class E plus conspicuity (Transponder Mandatory Zone (TMZ) and/or Radio

Mandatory Zone (RMZ) airspace¹ and one area of combined TMZ/RMZ airspace, thereby providing direct connectivity between the existing BZN CTR and the national airways structure and delivering improved containment of instrument flight procedures in CAS.

- b. A revised Concept of Operations (CONOPs) Letter of Agreement (LoA) to define the procedures used between BZN and LOA within their common area of interest based upon improved airspace design.
- c. The introduction of RNAV (GNSS) approach procedures².

Chronology of Proposal Process

Framework Briefing

- 8. Notwithstanding that the CAA introduced a new airspace change process on 2 January 2018 (known as CAP 1616) this proposal 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 confirmed in 2017³.
- 9. A Framework Briefing took place at CAA House, London on 11 September 2014 at which the sponsor provided outline detail of the airspace change proposal, the options considered and the preferred option to amend the structure of existing Class D airspace.
- 10. The CAA emphasised the need for a more comprehensive level of detail to support the justification narrative, including that data-gathering of evidence to support the change proposal should continue as the ACP is developed. The CAA also indicated that BZN should facilitate a meeting with LOA who were undertaking their own separate (but related) ACP and should ensure early engagement with local and national representatives of organisations such as

¹ Under this arrangement, aircraft operating under Visual Flight Rules (VFR) may enter the Class E CAS without a clearance from Air Traffic Control (ATC) providing they comply with either the RMZ or TMZ rules.

² The CAA does not regulate the changes to Military IFP as they are changes to the Mil AIP. However, the airspace required to contain them is a change to the UK AIP and therefore a CAA decision.

³ 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.

General Aviation (GA), Light Aircraft Association (LAA) and British Gliding Association (BGA) communities.

11. 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.
12. The CAA pointed out that LOA had a pre-framework briefing meeting scheduled with the CAA for 17th September 2014 for their own ACP. Although details of the LOA application were not known, stakeholders would rightly expect a joint and coordinated airspace solution between RAF Brize Norton and LOA, given the complex interactions and interdependencies between the respective airspace structures, and the CAA would insist that this was the case.
13. The sponsor outlined that the ACP was intended to future-proof the introduction of future navigational requirements, albeit that it was accepted that full containment of RNAV procedures was not being sought.
14. The sponsor provided an ACP timeline which include a target decision date of end December 2015.
15. 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.

Consultation

16. A public consultation took place between 15 December 2017 and 5 April 2018. The consultation document⁴ was emailed to 714 organisations and individuals including local aerodromes, NATS, local airspace users and national bodies representing all UK aviation interests. National bodies such as the General Aviation Alliance (GAA), British Microlight Aircraft Association (BMAA) and BGA were represented through the National Air Traffic Management Advisory Committee (NATMAC). The consultation document was made available online

⁴ Available on the CAA website [RAF Brize Norton consultation document](#)

through BZN's website⁵ and the 714 consultees were contacted predominantly via email; however, some organisations were contacted using online forms or via letter. Two stakeholder drop-in events were facilitated. The consultation was widely discussed as a standing agenda item at the Oxfordshire Area of Intense Aerial Activity (AIAA) Users Working Group (now known as the Oxfordshire Regional Airspace Users Working Group or RAUWG). In addition, local authorities and Members of Parliament that represent affected areas were consulted.

17. Responses were received from 48 of the targeted organisations and an additional 1598 responses were received from individuals and other parties⁶.

Documents considered by the CAA

18. In assessing the proposal and making this decision, the CAA has taken account of:
- a. RAF Brize Norton Consultation – Issue 1 dated 15 December 2017.
 - b. RAF Brize Norton Airspace Change Proposal (Consultation Feedback Report) – Issue 1 dated 3 October 2018.
 - c. Oxford RAUWG Minutes for meeting held 14 November 2018
 - d. Stakeholder Engagement Meeting – 17 September 2019
 - e. GAA Engagement – 22 November 2019
 - f. RAF Brize Norton Airspace Change Safety Case Part 1 (Safety Requirements) – Issue 2 dated 26 June 2020.
 - g. RAF Brize Norton Airspace Change Safety Case Part 2 (Design Substantiation) – Issue 1 dated 26 June 2020.

⁵ On 1st March 2018 the RAF Brize Norton website was updated as part of a larger RAF-wide website update. RAF Brize Norton arranged for London Oxford Airport (LOA) to host the BZN Consultation Document whilst the RAF website was updated. Enquiries were re-directed to the relevant information in its alternate location. The consultation material was restored to the new site on 2nd March 2018.

⁶ Available on the CAA website [RAF Brize Norton consultation feedback report](#)

- h. RAF Brize Norton Airspace Change Safety Case Part 3 (Transition to Service) – Draft B dated 26 June 2020.
- i. RAF Brize Norton Proposal Document; 04 August 2020; Issue 1.
- j. Proposal for Revised Airspace and Instrument Flight Procedures; 04 August 2020.
- k. RAF Brize Norton Consolidated Stakeholder Engagement Log.
- l. Raw data submitted by RAF Brize Norton including stakeholder consultation responses received by email/letter and outgoing and incoming email correspondence.
- m. Stakeholder correspondence received by the CAA direct.
- n. RAF Brize Norton Operational Assessment
- o. RAF Brize Norton Consultation Assessment
- p. RAF Brize Norton Environmental Assessment

CAA Analysis of the Material provided

19. As a record of our analysis of this material the CAA has produced:

- An **Operational Assessment** which is designed to brief the decision maker whether the proposal is fit for purpose. This assessment contains:
- The CAA's assessment of the airspace change proposal justification and options considered.
- 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.

- 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.
- The CAA's assessment of whether maps and diagrams explain clearly the nature of the proposal.
- 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.
- 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.
- 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.

- 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. BZN planned to conduct their consultation between 15 December 2017 and 22 March 2018. The consultation commenced on 15 December 2017 but following stakeholder feedback that images contained within the materials were distorted the consultation length was extended by two-weeks to take account of the publication of additional images on the BZN website. 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 and captured the key themes from their consultee feedback, and these have been accurately outlined in their 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. Ten stakeholders (0.6%) 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 any comments were welcome on the proposal, both positive and negative. The sponsor modified the proposal in the light of objections received.