



London Oxford Airport Airspace Change Proposal

Consultation Feedback Report

Date: 26th October 2018

Author:

Revision: Issue 1

Osprey Ref: 70893 039

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The Hub, Fowler Avenue, Farnborough Business Park, Farnborough, GU14 7JP

01420 520200 / enquiries@ospreycl.co.uk

Registered in England and Wales under No: 06034579



Document Details

Reference	Description
Document Title	London Oxford Airport Airspace Change Proposal
	Consultation Feedback Report
Document Ref	70893 039
Issue	Issue 1
Date	26 th October 2018
Client Name	London Oxford Airport
Classification	For Public Release

Issue	Amendment	Date
Issue 1	Initial Issue	26 th October 2018

Executive Summary

London Oxford Airport (LOA) would like to extend thanks to all organisations and individuals who took the time to participate and provide feedback to our public consultation that took place during the period 15 December 2017 to 5 April 2018. As the Sponsor of a proposed change to the current arrangements and procedures in the immediate airspace surrounding the airport, LOA seeks to provide enhanced protection to aircraft in the critical stages of flight, during the departure and final approach.

As part of the Civil Aviation Authority's (CAA) Guidance on the Application of the Airspace Change Process (Civil Aviation Publication (CAP) 725) [Reference 1], LOA is required to submit a case to the CAA to justify its proposed airspace change. As part of the process, LOA was eager to ensure that the views of all local stakeholders were fully considered, and that proposed designs were appropriately modified to address any concerns raised. As directed by the CAA during the Framework Briefing, and in accordance with CAP 725, LOA was required to undertake a full public consultation with aviation and non-aviation stakeholders.

This document is a report on the consultation carried out by LOA. It includes an analysis of all submissions received throughout the consultation period. It also includes a summary of all responses that supported the proposal as well as detailing the key issues raised by consultees that objected. The report provides comment on the issues raised and outlines the post-consultation changes currently being made in preparation for submission of the final Airspace Change Proposal (ACP) to the CAA. This document will form part of the ACP submission to the CAA. The ACP itself will detail the case for the proposed change to the current arrangements and procedures in the immediate airspace surrounding LOA.

Consultation Stakeholders and Statistical Analysis of Responses

The Consultation Document was circulated to a total of 758 organisations and individuals via email, online form and letter. The aviation consultees included the Ministry of Defence (MOD), airlines, aircraft operators, adjacent aerodromes, local airspace users and the national bodies representing all UK aviation interests who may be affected by the proposed changes. National bodies such as the Light Aircraft Association (LAA), the British Airline Pilots' Association (BALPA), and the Airport Operators Association (AOA) were represented through the auspices of the National Air Traffic Management Advisory Committee (NATMAC), sponsored by the CAA. Several military organisations are also members of the NATMAC.

A total of 66 responses (8.7 %) were received from the 758 consultees contacted. In addition, LOA received a total of 1641 responses from other individual members of the General Aviation (GA) community and local residents. Of the total of 1,707 responses received; 17 consultees supported the proposal; 1,657 consultees objected to the proposal; 13 consultees provided a neutral response; and 20 responses included clarification questions but after their questions were answered the stakeholder did not respond again to express their opinion regarding the consultation.

The significant levels of opposition were primarily generated by the GA community, including local and regional aviation clubs and national organisations such as the British Gliding Association (BGA). Additionally, there were also a significant number of objections from local communities. The main emphasis of the concerns raised by the GA community are as follows:

- The extent of the suggested CAS construct is considered to cause a reduction in the current levels of safety for GA pilots. The new CAS design is considered to

produce a funnelling effect as aircraft avoid and go around CAS rather than transit through which has safety implications including an increased risk of mid-air collision (MAC);

- The extent of the proposed CAS construct is also considered disproportionate to the requirements of LOA, and unjustified based on the number of aircraft movements now and in the future;
- The base of the proposed CAS is considered too low to facilitate soaring and will have an impact on cross-country flights. The impact on cross country flying was reflected in the geographical scale of responses received;
- The new CAS design is too complicated and is considered likely to increase the incidence of airspace infringements; and
- The incorrect process has been used to undertake the consultation phase of LOA's ACP due to the CAA's transition from CAP 725 to CAP 1616. This has been seen by many stakeholders as a cynical use of CAP 725 to deliberately avoid the requirement for enhanced engagement with affected stakeholders.

The proportion of objections from local residents was significantly lower than that of the GA community, however the main emphasis of the concerns in many cases echoed that of the GA community. Additionally, local residents raised concerns regarding:

- A perceived increase in noise and pollution as a result of an increase in number of aircraft; and
- The ACP being part of wider plans to expand LOA, which include the expansion of the runway.

The Consultation raised concerns from the Ministry of Defence (MOD) over the increase in Controlled Airspace (CAS). Whilst the MOD considered CAS as a method of managing airspace safely, rather than denying access, they considered that many in the GA community would not consider CAS in this way and this could lead to a funnelling of GA aircraft.

NATS had no objection to the establishment of new GNSS procedures and were content that the proposed CAS would have no operational impact on NATS Swanwick. NATS did raise concern that the proposed CAS left an area of Class G airspace between airspace OX CTR2 and the base of DTY CTA. They considered that as varying atmospheric pressure would alter the dimensions of this volume of airspace, it could present an increased risk of CAS infringement. NATS recommended that LOA should propose a direct connectivity to the en-route network, to improve the operational interface between LOA and NATS Swanwick and to enable greater sector capacity.

Next Stages

LOA is committed to minimising the effects of its proposed design on aviation stakeholders who currently utilise the local airspace. Following the consultation process, LOA has therefore undertaken an assessment and redesign of the original proposal presented in the consultation materials. The final proposal will be detailed in the ACP submission, and this will recognise the objections and proposed alternatives received during the consultation process. These objections and alternatives emphasised the importance of reducing the perceived impact on the GA community by the introduction of Class D airspace. The objections also expressed a view that more consideration should be given to alternative solutions that were discounted in the initial consulted designs.

Following receipt of the formal ACP submission, this report and the safety case documentation, the CAA will assess the proposal to determine if sufficient information has been presented to

fully inform the CAA decision. Thereafter, the CAA will complete its own internal assessment over a 16-week period before arriving at a Regulatory Decision.

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1 Glossary

Acronym	Meaning
ACP	Airspace Change Proposal or Process
AIRAC	Aeronautical Information Regulation and Control
AMSL	Above Mean Sea Level
AOA	Airport Operators Association
AOPA UK	Aircraft Owners and Pilots Association UK
ATC	Air Traffic Control
BALPA	British Airline Pilots Association
BGA	British Gliding Association
BMAA	British Microlight Aircraft Association
BPA	British Parachute Association
BRA	British Rotorcraft Association
BZN	RAF Brize Norton
CAA	Civil Aviation Authority
CAP	Civil Aviation Publication
CAS	Controlled Airspace
CAT	Commercial Air Traffic
CTA	Control Area
CTR	Control Zone
DAATM	Defence Airspace and Air Traffic Management
FAS	Future Airspace Strategy
ft	Feet
GA	General Aviation
GNSS	Global Navigation Satellite System

Acronym	Meaning
HCAP	Honourable Company of Air Pilots
HCGB	Helicopter Club of Great Britain
IFP	Instrument Flight Procedure
IFR	Instrument Flight Rules
LAA	Light Aircraft Association
LHR	London Heathrow Airport
LOA	London Oxford Airport
LoA	Letter of Agreement
MAC	Mid Air Collision
MAP	Missed Approach Procedure
MOD	Ministry of Defence
NATMAC	National Air Traffic Management Advisory Committee
nm	Nautical Miles
OAIAAUWG	Oxfordshire Area of Intense Aeronautical Activity Users Working Group
RAF	Royal Air Force
RAZ	Radio Advisory Zone
RMZ	Radio Mandatory Zone
SARG	CAA Safety and Airspace Regulation Group
TMZ	Transponder Mandatory Zone
UKFSC	UK Flight Safety Committee
VFR	Visual Flight Rules

2 Introduction

This document is a report of the consultation carried out by London Oxford Airport (LOA) between 15 December 2017 and 5 April 2018, concerning proposed changes to the current airspace arrangement in the immediate surroundings of LOA. The aim of this report is to present the detailed statistical analysis of the consultation responses.

2.1 London Oxford Airport Airspace Change Proposal

LOA is the sponsor of a proposed change to the current airspace arrangement in the immediate surroundings of LOA. The prime aim is to provide enhanced levels of safety to aircraft operating in the vicinity of the airport and to protect its new Instrument Approach Procedures (IAPs). As part of the Civil Aviation Authority's (CAA) Guidance on the Application of the Airspace Change Process (Civil Aviation Publication (CAP) 725) [Reference 1], LOA is required to submit a case to the CAA to justify its proposed airspace design and undertake consultation with aviation and non-aviation stakeholders. The consultation is required to ensure that stakeholders who may be directly or indirectly affected by the proposed change have an opportunity to provide comment on the proposal before its submission to the CAA. LOA has engaged Osprey Consulting Services Ltd (Osprey) to manage the Airspace Change Process on their behalf. The methodology for this consultation is detailed in Annex A1 to this document.

LOA would like to thank all consultees for their very useful feedback, particularly those who clearly spent a great deal of time constructing very detailed responses, many of which also included alternative suggestions.

2.2 Subject of the Consultation

The subject of the consultation was LOA's proposed options to establish new arrival and final approach procedures, protected by Class D CAS designed to encompass the associated primary and secondary protection areas.

The objectives of the LOA Airspace Change Proposal (ACP) are to:

- Create a 'known traffic environment' to enhance the safety of IFR aircraft arriving at LOA from the north to Runway 19, by minimising the number of instances where avoiding action or break-off instructions are required
- Minimise adverse effects on controller capacity and pilot workload.
- Improve the interactions between RAF Brize Norton (BZN) and LOA flight procedures. The existing procedures are complex and also create a more intensive workload than is necessary for ATCOs at both airports.
- Future-proof the Instrument Flight Procedures (IFPs) in accordance with the CAA Future Airspace Strategy (FAS).

LOA plans to achieve its objectives by:

- Introducing Global Navigation Satellite System (GNSS) compatible approach procedures; and
- Introducing a new airspace structure to protect the new procedures.

2.3 Development of the Consultee List

The consultation itself was designed to gather, and subsequently analyse, the views of aviation stakeholders, local authorities and elected members as well as members of the public who may have concerns about the effects of the proposed airspace change.

A full list of categorised consultees was developed following CAA advice, and is provided below at Annex A2.

At the start of the consultation, LOA sent out notification to 758 consultees, comprising:

- 31 Aviation “National Organisations” (CAA National Air Traffic Advisory Committee (NATMAC list);
- 13 Airport Users;
- 46 Members of the Oxfordshire Area of Intense Aeronautical Activity Users Working Group (OAIAAUWG);
- 19 Local Aerodromes/Aviation Consultees;
- 212 County and District Councils and Councillors;
- 414 Parish Councils or Meetings;
- 19 Members of Parliament; and
- 4 Environmental organisations.

The consultees were contacted predominantly via email. Some organisations were contacted using online forms or traditional letters. Only 1 email was returned as undelivered. Therefore, the total number of consultees that received the consultation email was 757.

2.4 Consultation Confidentiality

The CAA Safety and Airspace Regulation Group (SARG) requires that all consultation material, including the copies of individual responses from consultees, is included with the formal proposal submission to the CAA.

As sponsor of this change, LOA recognises its responsibility to fully comply with the Data Protection Act (2018), which replaces the 1998 Data Protection Act. The new Act is based upon the recently introduced European GDPR directive. LOA undertakes that the airport and its consultants, Osprey CSL, will retain only the necessary material voluntarily provided as part of the consultation process, for its analysis purposes, for development of its final proposal and for transmission to the CAA as required. LOA and Osprey CSL will not disclose personal details or the content of responses or submissions to any third parties.

2.5 Document Structure

This document contains 6 main Sections and 4 Annexes, outlined below for convenience:

- Section 1 provides a glossary of terms used;
- Section 2, this section, introduces the document;
- Section 3 details the consultation statistics;

- Section 4 provides an overview of the responses, support ratio and objections raised, and proposed alternative suggestions;
- Section 5 outlines the next stages with respect to the LOA ACP; and
- Section 6 provides a list of references.

Annexes:

- Annex A1 details the consultation methodology;
- Annex A2 lists the consultees;
- Annex A3 illustrates the consulted airspace design; and
- Annex A4 provides a review of proposed alternative suggestions for airspace design.

3 Consultation Statistics

LOA circulated the Consultation Document via email to a total of 758 stakeholder consultee organisations or individuals, of which 1 was returned as undelivered. The Consultation Document was also posted on the London Oxford Airport website. 66 of the 758 organisations responded, and a further 1641 responses were received by other individuals and organisations.

3.1 Overview

This section describes the categories of consultee organisations and individuals that were contacted and gives a breakdown of the responses received.

3.2 Consultee Organisations

The publication of the LOA Consultation Document was notified to stakeholders via email, online form and letter to a total of 758 stakeholder consultees, including 31 NATMAC organisations, and other individuals detailed in Annex A2. As stated in Section 2.3, 1 consultation email was returned as undelivered, therefore, the total number of consultees reached was 757.

The Consultation Document was made available for general distribution online through a dedicated link on the LOA website.

Aviation stakeholder consultees included the MOD, airport operators, adjacent aerodromes, local airspace users and the national bodies representing UK aviation interests who may be affected by the proposed changes. National bodies such as the Light Aircraft Association (LAA), British Airline Pilots Association (BALPA), and Airport Operators Association (AOA) etc. are represented through the auspices of the NATMAC, sponsored by the CAA. Several military organisations are also members of the NATMAC.

In addition, local authorities at Parish, District and County level were consulted; as were Members of Parliament that represent the local Parishes.

The consultee groups are detailed in Figure 1 below.

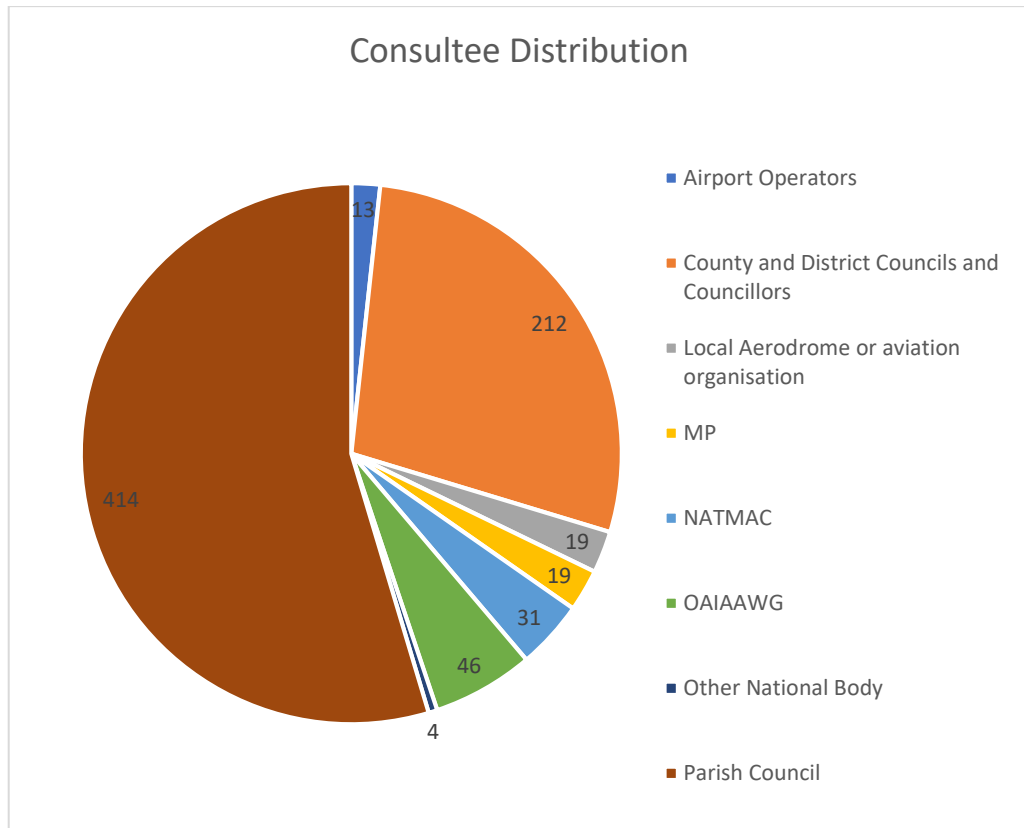


Figure 1 - Consultee Distribution

3.3 Consultation Responses

A total of 66 responses (8.7 %) to this consultation were received from the direct consultees. A breakdown of these is provided in Table 1 and Figure 2 below.

	Consultee Group	Number Consult	Responses	% ¹
1	Airport Operators	13	4	30.8%
2	Local Aerodromes and Aviation	19	7	36.8%
3	County and District Councils and Councillors	212	2	0.9%
4	Members of Parliament	19	4	21.1%
5	NATMAC	31	12	38.7%
6	OAIAAUWG	46	7	15.2%
7	Parish Councils	414	29	7.0%
8	Other national organisations	4	1	25%
	Totals	758	66	8.7%

Table 1 - Consultee Responses

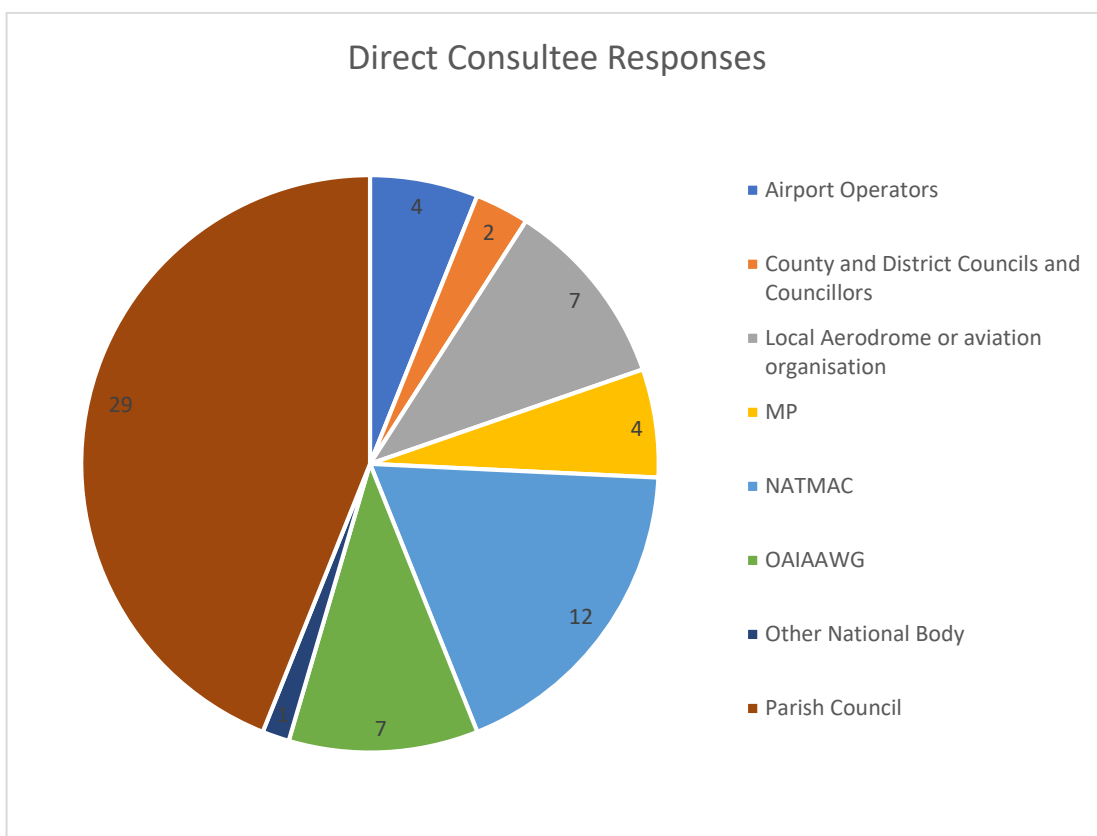


Figure 2 - Breakdown of Direct Consultee Responses Received

In addition to the 66 responses received from direct consultees (distribution shown in Figure 2), a further 1,641 submissions were received from other individuals or organisations making the total number of responses equal to 1,707.

¹ Percentage of those originally consulted.

It should be noted that “NATMAC” comprises those organisations who are members of the CAA’s NATMAC. The NATMAC consultee list includes some CAA Departments who, for reasons of CAA impartiality, do not respond to consultations.

MOD provided a consolidated response, through Defence Airspace and Air Traffic Management (DAATM), on behalf of all military consultees; this is standard MOD practice.

The majority of the responses received were from glider pilots and individuals associated with General Aviation (GA) groups and organisations.

3.4 Meetings with Aviation Stakeholders - Pre-Consultation

Prior to the commencement of the consultation period, several meetings were held with some of the local aviation stakeholders. The purpose of these meetings was to present the detail that would be incorporated into the Consultation Document to receive feedback on the proposed designs and to ensure there were no surprises for stakeholders when it came to formal comment.

Details of the consultation meetings that were organised with the aviation stakeholders are given in Table 2 below.

Meeting	Meeting Date
Stakeholder Engagement Meeting	16 th September 2015
Enstone Airfield	17 th September 2015
Hinton-in-the-Hedges	17 th September 2015
Oxfordshire AIAA Users Working Group	9 th December 2015
London Oxford Airport Consultative Committee (ACC)	28 th February 2018
Oxfordshire AIAA Users Working Group	11 th January 2017
Oxfordshire AIAA Users Working Group	6 th July 2017
BGA	15 th August 2017
BMAA	15 th August 2017
GAA	28 th September 2017

Table 2 - Pre-Consultation Stakeholder Meetings

3.5 Meetings with Stakeholders - During Consultation

During the consultation period additional public drop-in meetings with stakeholders were organised as shown below in Table 3.

Stakeholder	Meeting Date	Notes
Public Drop-in Session	21 February 2018	Public drop-in session held at LOA to allow members of the public and aviation stakeholders to ask questions of airport representatives including LOA management and ATC
Public Drop-in Session	27 February 2018	Public drop-in session held at LOA to allow members of the public and aviation stakeholders to ask questions of airport representatives including LOA management and ATC

Table 3 - Additional LOA Consultation Meetings

Although not specifically organised to discuss the LOA proposal, the drop-in sessions show in Table 4 below were hosted by RAF Brize Norton. At these events a significant amount of discussion also took place concerning the LOA proposal and the constraints and interdependencies between the LOA and RAF Brize Norton Airspace Changes.

Stakeholder	Meeting Date	Notes
Public Drop-in Session	20 th February 2018	Public drop-in session held at RAF Brize Norton Community Centre to allow members of the public and aviation stakeholders to ask questions of RAF representatives, including operations and ATC staff.
Public Drop-in Session	28 th February 2018	Public drop-in session held at RAF Brize Norton Community Centre to allow members of the public and aviation stakeholders to ask questions of RAF representatives, including operations and ATC staff.

Table 4 - RAF Brize Norton Consultation Meetings

4 Analysis of Responses

Of the 1,707 individual responses received in total, 17 supported the proposal, 1,657 consultees objected to the proposal and 13 provided a neutral response or had no comments on the proposal. 20 consultees asked questions but did not register a formal response.

4.1 Overview

This section provides details on the number of responses received from the various organisations and individuals that were consulted. It also studies the percentage of stakeholder consultees that raised concerns about the proposal and explores the support ratio of consultee responses received to give a general indication on stakeholder levels of acceptance for the proposal.

4.2 Response Ratios

Of the 1,707 responses received during the consultation period:

- 17 consultees (1.0 %) supported the proposal;
- 1657 consultees (97.1 %) objected to the proposal;
- 13 consultees (0.8 %) provided a neutral response or provided no comments on the proposal; and
- 20 consultees (1.2 %) provided questions for clarification purposes but did not formally provide a response.

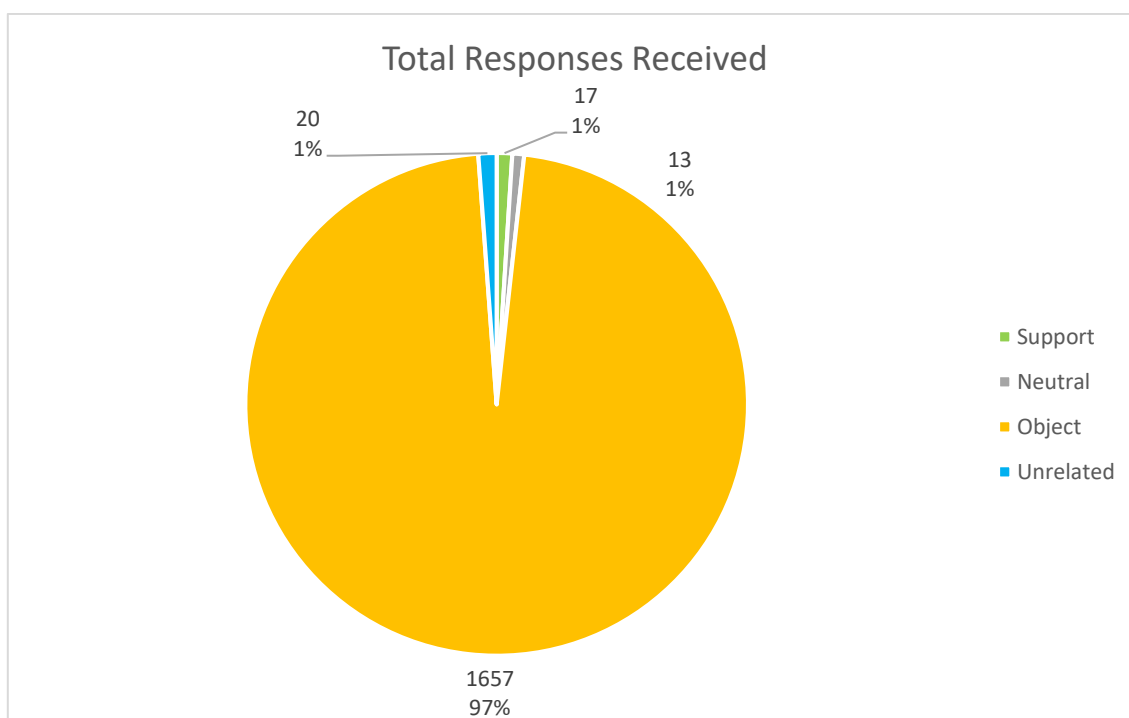


Figure 3 - Breakdown of All Responses Received

4.3 NATMAC Responses

4.3.1 AOPA UK

The Aircraft Owners and Pilots Association (AOPA UK) objected to the proposal. They stated that the analysis provided did not support the case that there is a significant issue with unknown traffic in Class G in the vicinity of the final approach area of Runway 19. AOPA UK provided an in-depth analysis of the proposed airspace design and provided a number of recommendations that they considered would improve the design. The recommendations included the review of discounted options such as a Radio Mandatory Zone (RMZ) or Class E.

4.3.2 British Gliding Association

The British Gliding Association (BGA) objected to the proposal. They considered that the proposal had been developed using incomplete and inaccurate data that resulted in misleading assumptions. They stated that the proposal would increase the risk to most airspace users and would damage the sport of gliding. The BGA also considered that there had been inadequate stakeholder engagement and there was an existing relationship between the consultancy supporting LOA with the process and the CAA.

4.3.3 British Microlight Aircraft Association

The British Microlight Aircraft Association (BMAA) objected to the proposal. They considered that LOA had not established a need for airspace change based on safety and the proposed airspace design would lead to a decrease in flight safety as a result of traffic displacement. They also considered that there would be significant disadvantage to current airspace users without a resulting safety benefit. They stated that the airspace proposed was not justified and the sponsor had not demonstrated knowledge of the number of aircraft that will require cooperation to use the proposed airspace. They also stated that LOA had not demonstrated that a staffing programme had been put in place to ensure that all local airspace users will be able to obtain the services required to operate efficiently and safely. The BMAA also considered that the proposal did not meet the environmental requirements of the FAS, nor did it conform to the CAA Airspace Charter.

4.3.4 British Parachute Association

The British Parachute Association (BPA) objected to the proposal. The BPA considered that the proposed Class D would be avoided by GA aircraft increasing traffic levels in choke points along the border of the proposed airspace. They expressed particular concern over Hinton in the Hedges airfield, where they considered there would be an increased likelihood of aircraft infringing the drop zone and increasing the risk of collision with parachuting activity. The BPA also stated that the proposed airspace would lead to more airspace infringements in Class D airspace. The BPA considered that the proposal was not proportionate and provided safety and convenience for LOA aircraft at the expense of GA. They also considered that LOA's use of CAP 725 to be extremely cynical.

4.3.5 British Rotorcraft Association

The British Rotorcraft Association (BRA) objected to the proposal. The BRA considered that the terms LOA and BZN were not appropriate abbreviations for London Oxford Airport and RAF Brize Norton and this was sufficient justification for the proposal to be dismissed. They also stated that London Oxford Airport is not the legal name of the entity that owns airport or hold its licence of operations and the airport owner should be stated in the consultation document.

The BRA also stated that the proposal covered a large amount of airspace and created barriers to other airspace users but did not address the specific needs of those operating into and out of LOA and was based on the assumption that the BZN ACP will also be approved. The BRA stated that the proposal identifies potential conflict points between LOA and BZN but does not adequately address how hand-overs will be managed. The BRA considered that there will be increased funnelling to the north of Oxford as a result of the proposed airspace and there appears to be no additional safety benefits, but an increase in negative benefit and risk to those outside CAS. The BRA also considered that the option to utilise an RMZ was too quickly dismissed.

4.3.6 Defence Airspace and Air Traffic Management

Defence Airspace and Air Traffic Management (DAATM) provided no objections to the proposal. Whilst they stated that the MOD broadly supports the use of CAS where it is justified, they requested that several matters were considered within the final submission to the CAA. The MOD primarily views CAS as a method for safely managing airspace and not as a means of denying access. However, they recognise that elements of the GA community do not agree with this statement. As a result, the amount of new CAS should be limited to the minimum required to achieve the aims of the ACP and LOA should guarantee that they will be suitably equipped and staffed to ensure access is always permitted for other airspace users.

4.3.7 General Aviation Alliance

The General Aviation Alliance (GAA) objected to the proposal. They considered that the approach to consultation with aviation and non-aviation stakeholder was lacking. They were also disappointed that LOA did not form a Focus Group. The GAA considered that Class D is not necessary to achieve an acceptable level of safety for LOA's current and likely future operations. The GAA stated that the consultation document contained misleading information and did not properly assess the impact that proposed designs would have on the GA community. The GAA did not consider it appropriate for the ACP to continue under the CAP 725 process and stated that they have requested Government intervention.

The GAA provided a suggested alternative airspace design that would utilise a smaller area which is designated as an RMZ as shown in Figure 4 below.

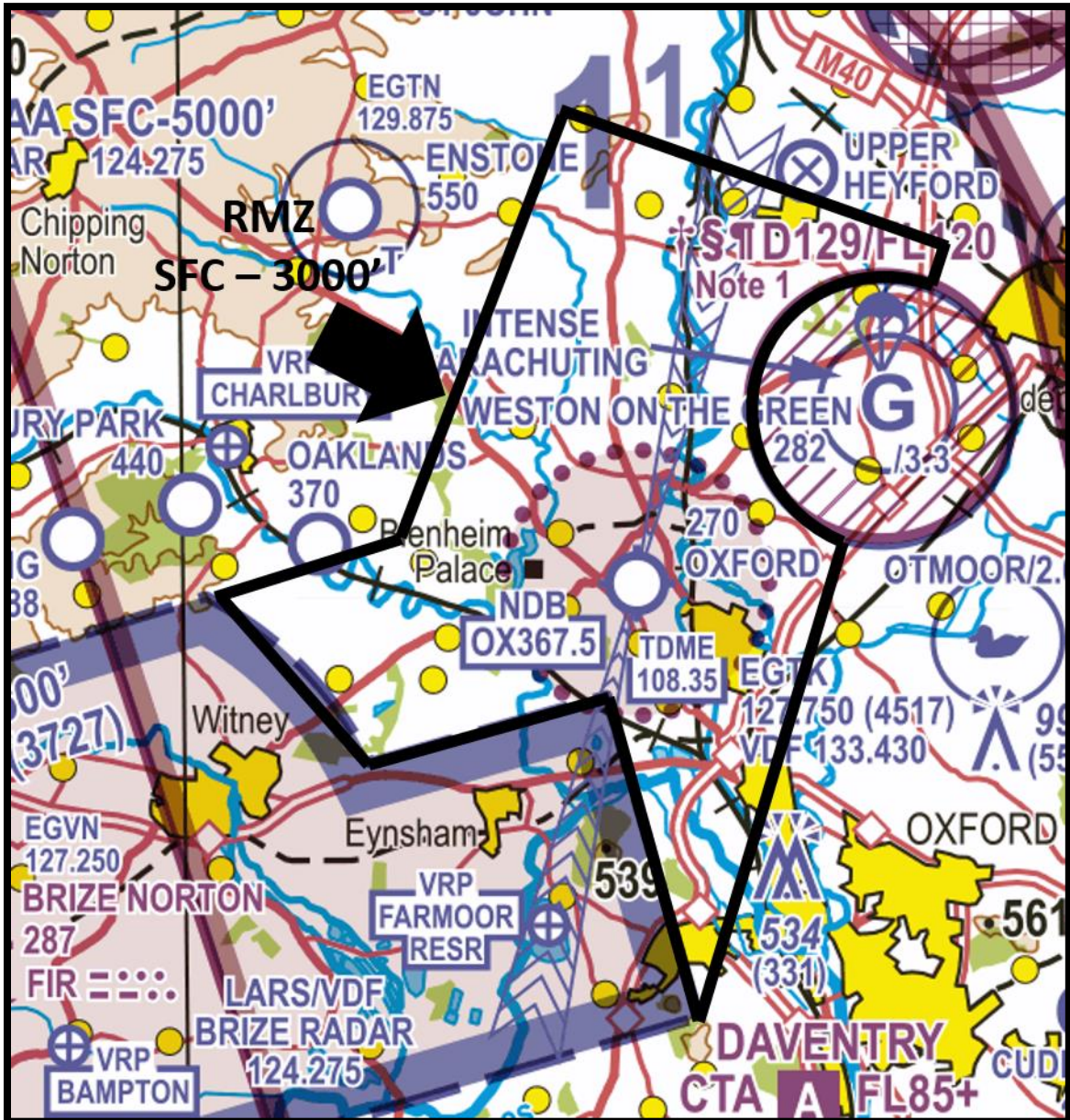


Figure 4 - GAA Proposed Alternative Airspace Design for LOA²

4.3.8 Helicopter Club of Great Britain

The Helicopter Club of Great Britain (HCGB) objected to the proposal. They considered that the current and future traffic levels at LOA would not justify such a large area of CAS, and they considered there to be insufficient evidence that the current airspace arrangement is unsafe. The HCGB also considered that the proposal did not contain information regarding how LOA would fulfil its obligation to manage their radio frequencies appropriately to ensure that access was granted to all traffic. The HCGB considered that the proposal did not follow the fact and spirit of the CAA's policy of 'Flexible Use of Airspace'. HCGB also considered that the proposed Class D would create dangerous choke points and when combined with the airspace proposal

² This image has been recreated from the original image included in the GAA submission to provide a more detailed VFR chart background. Every effort has been made to faithfully recreate the design shown in original image however LOA accept that minor positional changes may have occurred.

for RAF Brize Norton, block existing transit routes between the northwest and southeast of England. The HCGB stated that the consultation document statement that pre-consultation activity had taken place was misleading and stated there was no meaningful engagement.

HCGB stated that a small area of RMZ/TMZ airspace would adequately address the needs of LOA.

4.3.9 Honourable Company of Air Pilots

The Honourable Company of Air Pilots (HCAP) objected to the proposal. They stated that the consultation document did not contain sufficient evidence for the safety assertions made by LOA. The HCAP also considered that discounting of the use of a listening squawk is contrary to the evidence given in the consultation document. The HCAB raised concerns that the level of ATC manpower at LOA should be sufficient to ensure that access is granted to all airspace users and not doing so would present a barrier to non-CAT/ IFR airspace users.

The HCAP considered that an airspace solution involving an RMZ was discounted too readily, and that it would provide a more balanced solution.

4.3.10 Light Aircraft Association

The Light Aircraft Association objected to the proposal. They stated that they believe the ACP was hastily prepared to avoid the introduction date of CAP 1616 and that the proposal did not offer any significant safety benefit to the overall aviation community. The LAA considered that the risks to LOA would remain the same and the risks to GA aircraft would increase. The LAA recommended that LOA should reassess the option of an RMZ to generate a “known traffic environment” and that LOA should be more proactive in establishing Letters of Agreement with local airspace users.

4.3.11 NATS

NATS had no objection to the establishment of GNSS procedures and were content that the proposal would have no operational impact on the NATS Swanwick operation. However, NATS requested clarification on whether LOA intended to change the current procedures between LOA and NATS.

NATS also highlighted that the proposed airspace left a sliver of Class G between the top of the proposed OX CTR2 and the base of the DTY CTA. They considered that as varying atmospheric pressure would alter the dimensions of this volume of airspace, it could present an increased risk of CAS infringement. NATS' proposed solution was to include this volume of airspace to allow for a seamless interface that will enable greater sector capacity whilst keeping controller workload within acceptable margins.

4.3.12 UK Flight Safety Committee

The UK Flight Safety Committee (UKFSC) objected to the proposal. They considered the establishment of Class D airspace to be disproportionate to the traffic volumes and would have an adverse effect on GA activity. The UKFSC also considered there to be a lack of evidence to support the claims made by LOA about the increase in future risks to aircraft flying procedures.

The UKFSC detailed the justification behind instituting an RMZ instead of CAS. They considered an RMZ to be a simple solution to provide a known traffic environment.

4.4 Submissions from Individuals and Other Aviation Organisations

Of the 1,641 responses to the consultation received from those not in the formal consultee list, the majority were from GA pilots, particularly glider, hang glider and paraglider pilots, many of whom are also members of local flying clubs.

Notwithstanding that their representative organisations may have submitted detailed responses to the consultation on behalf of their membership, all of the additional individual submissions have been documented and analysed by LOA and will form part of the formal ACP submission to be made to the CAA in due course. Any new issues identified in the individual submissions which had not already been raised by the formal consultees are embraced within the key issues (Table 5) in Section 4.8.

Responses were received from the following flying clubs and airfields:

- Avon Hang gliding and Paragliding Club;
- Banbury Gliding Club;
- Bath Wilts and North Dorset Gliding Club;
- Bicester Gliding Centre;
- Bidford Gliding and Flying Club;
- Booker Gliding Club;
- Buckinghamshire Microlight Club;
- Cambridge Gliding Club;
- Challow Paramotor Club;
- Chiltern Gliding Club;
- Cloudbase Microlighting;
- Cotswold Gliding Club;
- Deeside Gliding Club;
- Denham Aerodrome;
- Derby Aero Club;
- Devon and Somerset Gliding Club;
- Dunstable Hang gliding and Paragliding Club;
- East of Scotland Microlights;
- Enstone Flying Club;
- Hinton Skydiving Centre;
- Holmbeck Airfield;
- Lasham Gliding Society;
- London Gliding Club;
- North Devon Hang gliding and Paragliding Club;
- Owner/Operator of the Northside Grass Runway at Enstone Airfield;
- Oxford Gliding Club;
- Oxfordshire Sportflying;
- Shenington Gliding Club;
- South East Wales Hang gliding and Paragliding Club;
- Southdown Gliding Club;
- Stratford on Avon Gliding Club;
- Thames Valley Hang gliding and Paragliding Club;
- The Pilot Centre, Denham;
- University of Surrey Gliding Club;
- Vale of White Horse Gliding Centre;
- Vintage Aircraft Club; and
- XClent Paragliding Club.

4.5 Support Responses

The number of responses supporting the proposal was comparatively small, however supportive responses were received from local residents, members of the GA community, local airspace users and local authorities.

The rationale for support centred around the additional levels of safety for IFR operations and included comments stating that the need for change was recognised and the current airspace situation was unsustainable. The Airport Operators who supported the proposal indicated that the introduction of Class D would increase the level of safety for their operations, however one operator, Airbus Helicopters UK, were keen to stress that it was concerned that an overly vigorous imposition of ATC regulations would result in their VFR operations being limited. Another Airport Operator, Capital Air Services, indicated that they believed that there was a common misconception amongst the GA community that Class D was closed to GA.

4.6 Stakeholder Objection Responses

A total of 1,657 objections to the proposal were received throughout the consultation period. The consultee types and respective numbers are given below:

- 1 objection from an Airport Operator;
- 36 objections from local aerodromes/aviation organisation;
- 7 objections from members of the OAIAAUWG;
- 2 objections from Members of Parliament;
- 10 objections from NATMAC consultees;
- 14 objections from local authorities;
- 1564 objections from individuals within the aviation community;
- 18 objections from individuals outside the aviation community; and
- 5 objections from other organisations not associated with aviation or based overseas.

4.7 Key Issues Arising

The response analysis process identified a number of key themes in those responses that objected to the proposal. These are outlined in Table 5 below together with the number of consultees who expressed that view in their response. The objections are divided into a series of tranches to reflect the volume of responses received pertaining to a key issue arising.

Number of Responses	Nature of objection	Number of responses
Tranche 1 (Over 100 responses refer to the issue)	Reduction in safety for GA	942
	Choke points ³	917
	Disproportionate	479
	Increased risk of mid-air collision	449

³ In this analysis Choke points refers to all references to choke points, pinch points, choke areas and funnelling.

Number of Responses	Nature of objection	Number of responses
	Impact on cross country flying	283
	Incorrect/cynical use of CAP 725	236
	Benefit for the few at the expense of the many	183
	Restriction on free flying	182
	Uncompelling safety argument	169
	Proposal based on commercial gain	148
	No consultation with the paragliding/hang gliding community	123
	Unjustified based on number of movements	119
	Unnecessary	112
	Impact on Avon Aerotow Group	105
	Increased incidence of airspace infringements	105
	Unjustified	101
Tranche 2 (50 – 100 responses refer to the issue)	Airspace designed purely to make LOA operations easier	99
	Insufficient stakeholder engagement	97
	Impact on paraglider/hang glider operations	95
	LOA controllers will not be able to cope with the increased workload necessary	84
	Impact on gliding	82
	Airspace design does not consider the requirements of all airspace users	72
	Barrier to transit	68
	Impact on Enstone Airfield	68
	Airspace design does not consider prominent geographical features	66

Number of Responses	Nature of objection	Number of responses
	Airspace too complicated	60
Tranche 3 (10 – 50 responses refer the issue)	LOA has no Commercial Air Transport (CAT)	48
	Impact on GA	46
	Barrier to flight	45
	Access to CAS likely to be denied	45
	Financial impact on flying clubs and GA airfields	42
	Devastating blow for VFR flying	40
	Misleading consultation document	40
	Increased risk of land out	38
	Deliberately misleading consultation document	30
	Airspace too large	27
	Impact on downwind flights	21
	No prior consultation with paragliders/hang gliders	21
	Impact on local GA airfields	20
	Impact on GA airfields	20
	Proposal does not consider the safety of other airspace users	19
	Impact on gliding clubs	19
	Airspace design does not comply with Transport Act 2000 Section 70	18
	Barrier to north-south transits	17
	Airspace poorly designed	16
	Excessive	15
Proposal does not consider alternatives	14	

Number of Responses	Nature of objection	Number of responses
	Class D is inaccessible to gliders	13
	Impact on local airfields	13
	Impact on future pilots	11
	Increase in noise	11
	Airspace base too low	10
	Impact on Oxford Gliding Club	10
	Impact on viability of GA clubs	10
	Increased pilot workload	10
	No consideration for GA	10

Table 5 - Nature of Objections Raised by Consultees

4.8 Proposed Alternative Suggestions

Table 6 below details the suggested changes to the proposed airspace and procedure designs raised by consultees.

Nature of Concerns	Proposed Solution or Redesign
Redesign	<ul style="list-style-type: none"> – Simplify the airspace design. – LOA should ensure that the Class D proposed is the minimum required. – Extend the radius of the ATZ to 2.5nm – Utilise steeper descent gradients (5.5°). – Adapt the Missed Approach Procedure (MAP) for Runway 19 to avoid overflying built up areas. – CAS should be applied in layers. – Redesign the procedures for LOA and BZN so they don't conflict. – The north-south boundary between CTA 1 and CTR 1 should be moved 2nm to the east to allow downwind extensions. – The approach to Runway 01 should not have a 4nm section where aircraft maintain 1,500ft AMSL. – Redesign airspace to reduce the impact on gliding clubs. – Reshape CTA 1 and 2 to allow aircraft to pass more easily to the south east. – LOA should move the Runway 01 approach to the south by 0.5-1 mile to avoid overflying built up areas.

Nature of Concerns	Proposed Solution or Redesign
Reduce size of airspace proposed	<ul style="list-style-type: none"> – Reduce airspace to create a fair balance. – Reduce airspace in line with the volume of movements. – Remove CTA 1. – Remove all airspace except CTR 2.
Process	<ul style="list-style-type: none"> – LOA should completely restart the ACP process under CAP 1616. – LOA should allow sufficient time to assess the effectiveness of the listening squawk before instituting an ACP. – LOA should undertake a full environmental impact assessment. – LOA should undertake a modelling analysis of the risk of collision for aircraft outside of CAS. – The ACP should be delayed until the implications of a third runway at London Heathrow Airport (LHR) have been determined. – LOA should engage the CAA to facilitate a discussion between all stakeholders.
Creation of a known traffic environment	<ul style="list-style-type: none"> – Utilise an ADS-B system, FLARM technology, Radio Advisory Zone (RAZ), Radio Mandatory Zone (RMZ), Transponder Mandatory Zone (TMZ), Class E or a combination of these instead of Class D airspace. – LOA should operate a time-based Class D to allow daytime VFR operations in Class G. – LOA should pay £5,000 per cubic km per year for Class D.

Nature of Concerns	Proposed Solution or Redesign
Enhanced cooperation	<ul style="list-style-type: none"> – Combine or co-locate ATC services for LOA and BZN (and RAF Benson) to enhance cooperation. – Procedural issues between LOA and BZN should be resolved with a new Letter of Agreement (LoA). – LOA should use the existing BZN Class D airspace to allow aircraft to reduce altitude before commencing procedures. – LOA should consider the requirements of all airspace users before redesigning the proposed airspace. – LOA should engage with the British Gliding Association (BGA) and redesign the proposed airspace accordingly. – LOA should campaign to increase the use of the Listening Squawk prior to increasing CAS – LOA should provide assurances that all local GA will have access to the airspace via LoAs.
ATC Manpower	<ul style="list-style-type: none"> – LOA should increase controller numbers to handle workload rather than institute CAS. – Prior to instituting an airspace change LOA should provide assurances that there is sufficient controlling manpower to facilitate the level of transits expected.
Impact on Enstone Airfield	<ul style="list-style-type: none"> – LOA should raise the CTA over Enstone to 2,500ft AMSL to facilitate overhead joins.
Close LOA	<ul style="list-style-type: none"> – LOA should cease to operate as an airport and should instead be used for housing or a science and industry park. – LOA should move to a more suitable location to suit its needs. – LOA should move all of its operations to BZN. – LOA should fly its IFR approaches to a different airport. – All activity that LOA consider unsafe should cease.
VFR aircraft and helicopter operations	<ul style="list-style-type: none"> – LOA should consider the use of specific east-west/north-south VFR corridors for helicopters and VFR aircraft.

Nature of Concerns	Proposed Solution or Redesign
Independence	<ul style="list-style-type: none"> – LOA should employ independent consultants to take into account all viewpoints.
Simulators	<ul style="list-style-type: none"> – LOAS should utilise simulators for their training operations.
Increase size of CAS	<ul style="list-style-type: none"> – In order to reduce the risk of airspace infringement LOA should redesign the airspace to include the sliver of airspace between CTR 2 and DTY CTA.

Table 6 - Issues Raised and Potential Solutions Regarding the Proposed CAS and Procedures at London Oxford Airport

5 Post Consultation Actions

This section details the actions LOA are taking following a comprehensive review of the responses to the consultation.

5.1 Post-Consultation Review

Following the consultation, all comments received were thoroughly reviewed by LOA to identify the key issues of concern and ascertain what action will be taken to address the principal objections to the proposed designs, whilst retaining the required safety improvement sought by the Sponsor.

As detailed at paragraph 4.8 above, a number of alternative suggestions were proposed by stakeholders in their individual consultation responses; these fall broadly into the following categories:

- Redesign
- Reduce Size of Proposed Airspace
- Process
- Creation of a Known Traffic Environment
- Enhanced Cooperation
- ATC Manpower
- Impact on Enstone Airfield
- Close LOA
- VFR Traffic and Helicopter Operations
- Independence
- Simulators
- Increase size of CAS

LOA have considered the responses and suggestions received and reviewed the proposed designs accordingly. Table 14 at Annex A4 summarises this analysis.

5.2 Key Issues Identified Within the Consultation

Figure 5 in Annex A3 depicts the design for the LOA CAS as proposed for the public consultation. A detailed review of the key themes raised in the objections can be summarised as follows:

- The perceived reduction in safety for aircraft outside of CAS as a result of an increase in traffic density, choke points and associated risk of mid-air collisions;
- The disproportionate size of CAS requested based on the volume of aircraft predicted;
- The impact on the ability for pilots to conduct cross country flying;
- The incorrect or cynical use of CAP 725 ACP;
- The perceived unfair benefit for aircraft operated by LOA at the expense of GA; and
- The restriction on free flying imposed because of the proposed reduction of available Class G airspace.

5.2.1 Impact on General Aviation

LOA recognises that the GA community perceive Class D airspace to be a barrier to flight, therefore the imposition of this class of airspace would result in some GA operators routing around the proposed airspace, leading to an increase in traffic density outside of the proposed airspace and an exacerbation of existing choke points. A large number of objections also stated that the airspace requested was too large or disproportionate to the requirements of LOA and created an unfair benefit to one airspace user at the expense of others.

In light of the objections received, LOA has re-evaluated the proposed design and intend to reduce the overall volume of airspace proposed, and to change the classification to an RMZ/TMZ to facilitate GA movements as fully as possible.

5.2.2 Impact on Cross Country Flying

LOA acknowledges that Oxfordshire is home to a number of important GA cross-country routes that could be impacted by the proposed airspace changes. Throughout all stages of this airspace change process it has been LOA's intent to facilitate GA movements as widely as possible, however following the consultation process it is recognised that some GA operators will not operate in CAS because they prefer to operate without any level of air traffic control service, or they consider the requirement to adhere to control instructions would make route planning very difficult.

5.2.3 Safety Arguments

Many responses considered that the safety argument put forward by LOA was insufficiently compelling to justify the requirement for CAS with some commenting that the safety data utilised was a deliberate attempt to mislead the reader as the majority of events had no risk of collision. Additionally many responses considered that LOA had a responsibility to generate a risk analysis to determine the change in risk to aircraft operating outside of the proposed airspace.

The inclusion of safety data in the consultation was not intended to be misleading; the intent of inclusion was to demonstrate the complex area in which LOA aircraft are undertaking Instrument Flight Procedures. Additionally, LOA considers that the undertaking of a risk analysis process would be impractical as there are too many variables to generate a realistic evaluation of risk.

5.2.4 CAP 725 ACP Process

A large number of responses stated that LOA have used the incorrect CAA process (CAP 725) to undertake this airspace change, and this was considered to be due to LOA's desire to avoid the enhanced levels of stakeholder engagement required in the new CAA process (CAP 1616). CAP 1616 was introduced by the CAA on 4 January 2018. The announcement that the new process would be implemented was made in October 2017. By this stage, the LOA project was almost ready to start the Formal Consultation process. The CAA articulated transition arrangements for those airports that were already engaged in CAP 725 airspace change processes whereby airports that had already started Stage 4 would continue on the CAP 725 process. As a result LOA have continued to undertake the airspace change process stipulated in CAP 725.

5.3 LOA Conclusions

In the Consultation Document published on 15 December 2017, LOA proposed introducing new RNAV procedures, to comply with the CAA's requirement to implement PBN by 2024 and to future-proof the aerodrome. LOA also proposed

introducing a small volume of Class D airspace designed to safeguard the arrival and missed approach procedures.

The Consultation has produced significant opposition and the majority of objections has come from members of the GA community. Many GA focused clubs around the UK, including the BGA, the BPA, the LAA, the GAA, and the All-Party Parliamentary Group on General Aviation registered their strong opposition to the proposed changes and those objections were predominantly based on the perception that the proposed airspace:

- Would lead to a reduction in safety for GA pilots;
- Creates or exacerbates choke points;
- Is disproportionate to requirement;
- Would increase the risk of mid-air collision; and
- Would impact cross-country flying.

LOA remains committed to find a final solution that provides equitable access to as many classes of airspace users as possible. Additionally, and in line with CAP 725, LOA wishes to ensure the final proposal that will be submitted to the CAA, clearly balances any perceived “management by exclusion” against the adequate protection of aircraft on the LOA approach. LOA must also ensure the final proposed design allows the most effective and efficient use of its ATCO resource. At the same time LOA must ensure ATCOs are able to work at safe capacity levels.

The key issues raised during the consultation (Section 5.2) above, have led LOA to conclude that an element of redesign is necessary to present a solution that should be acceptable to the vast majority of airspace users, and those members of the public who expressed an interest in this project.

LOA has listened to the feedback received and has taken considerable effort to seek a compromise between its aims and objectives, whilst reducing the impact on other aviators within the vicinity. After reviewing a number of options to mitigate the concerns raised, LOA has concluded that the design it intends to submit to the CAA will consist of a smaller area of RMZ/TMZ predominantly to the north of LOA between the surface and 3,500ft amsl. This was intended to protect aircraft on approach to Runway 19 and it will also offer some protection to aircraft departing from Runway 01, thereby affording protection to aircraft during the critical stages of flight. The volume of the proposed RMZ/TMZ will be much smaller than the proposed Class D CTR and CTA that featured within the Consultation Document, and therefore fewer people will be impacted by the proposed change. Therefore, there is no requirement to re-consult on the modified design.

Air Traffic Control Officers (ATCOs) at LOA considered that these options could provide the appropriate level of safety required during the final stages of an instrument approach. At the same time, it would enable GA traffic to transit or operate in the area in accordance with the rules pertaining to these airspace structures, providing they are equipped with either a radio or transponder.

5.4 ACP - Next Stages

The consultation was the fourth stage of the CAP 725 [Reference 1] ACP process. Currently, LOA has some elements of redesign work to coordinate with the RAF Brize Norton ACP. This work is underway, and LOA will soon prepare the following final submission documents for the CAA:

- Proposal Document
- This Consultation Feedback Report

- All Consultation Feedback Responses
- Supporting Safety Case Documentation
- Environmental Assessments

Following receipt of the formal submission, the CAA requires a 17-week period (including a 1 week document check) to conduct its own internal analysis of the submitted documents before arriving at a Regulatory Decision.

In the event that the CAA supports the change without the need for further design optimisation or analysis, then it is proposed that implementation of the new IFPs and airspace structure will take place on an agreed date in accordance with the Aeronautical Information Regulation and Control (AIRAC) Cycle, and NATS Aeronautical Information Service (AIS) capacity.

6 References

Reference	Name	Origin
1	CAP 725 CAA Guidance on the Application of the Airspace Change Process Version 4.1 dated 15 Mar 2016	CAA
2	Code of Practice on Consultation July 2008	Cabinet Office URN 08/1097

Table 7 - Table of References

A1 Consultation Methodology

The LOA ACP consultation was conducted in accordance with the principles set out in the Cabinet Office Code of Practice on Consultation [Reference 2], as required by the CAA.

A comprehensive Consultation Document was prepared by LOA, presenting the proposal, rationale for the change, the perceived effects, and mitigation measures considered by LOA.

A link to the Consultation Document was made available on the LOA website. Consultees were notified by email alerting them to the consultation and how to access the Consultation Document.

Local aviation stakeholders were engaged at an early stage during the design process. Prior to final preparation of the Consultation Document, meetings were conducted with the stakeholders shown in Table 2 at Section 2.3.

The primary purpose of these meetings was to expose the stakeholders to the proposed airspace designs to receive feedback on the proposed designs and to ensure there were no surprises for stakeholders when it came to formal comment.

Full consultation commenced with wide circulation of the electronic Consultation Document and conceptual airspace designs to all identified stakeholders on 15 December 2017. The required minimum period for formal consultation is 12 weeks; however, following the release of amendments as part of the independent but simultaneous RAF Brize Norton ACP, the consultation was extended by 2 weeks to conclude on 5 April 2018.

Consultees were asked to consider the proposal and submit a response to LOA using a dedicated email address (LondonOxfordAirportconsultation@ospreydsl.co.uk).

A2 Stakeholder Consultee List

A2.1 Airport Operators

Airport Operators	
A2B Heli	GoFly Oxford
Airbus Helicopters UK	JCB Group Aviation
Airways Aviation	Netjets Europe
Capital Air Services	Oxford Airport General Aviation Group
Catreus	Pilot Flight Training
Cirrus Aviation	Volare Aviation
Gama Aviation	

Table 8 - Airport Operators

A2.2 Local Aerodrome and Aviation Organisations

Local Aerodrome and Aviation Organisations	
Bicester Gliding Centre	Oxford University Gliding Club
Bucks Microlight Club	RAF Benson National Police Air Service
Enstone Flying Club	RAF Benson Thames Valley Air Ambulance
Oxfordshire Sport Flying	RAF Brize Norton
Pegasus Flight Training	Shenington Gliding Club
Hinton Aerodrome – Aquila Gliding Centre	Turweston Aerodrome – Flight Centre
Hinton Aerodrome – Banbury Gliding Club	Turweston Aerodrome – Flying Club
Hinton Aerodrome – Go-Fly Oxford	Weston-on-the-Green Parachuting
Hinton Aerodrome – Sky Dive Hinton	Weston-on-the-Green Gliding
Oaklands Farm Strip.	

Table 9 - Local Aerodrome & Aviation Organisations

A2.3 Members of Parliament

Member of Parliament	Constituency
Victoria Prentis	Banbury
John Bercow	Buckingham
Alex Chalk	Cheltenham
Geoffrey Clifton-Brown	Cotswolds
Mark Harper	Forest of Dean
Richard Graham	Gloucester
John Howell	Henley
Jeremy Wright	Kenilworth and Southam
Justin Tomlinson	North Swindon
James Gray	North Wiltshire
Anneliese Dodds	Oxford East
Layla Moran	Oxford West and Abingdon
Andrea Leadsom	South Northamptonshire
David Drew	Stroud
Robert Buckland	Swindon South
Laurence Robertson	Tewkesbury
Ed Vaizey	Wantage
Robert Courts	Witney
Steve Baker	Wycombe

Table 10 - Members of Parliament

A2.4 National Bodies

National Bodies	
National Parks England	Natural England
National Trust	UNESCO

Table 11 - National Bodies

A2.5 NATMAC

NATMAC	
3 AF-UK/A3	DAATM
AEF	GAA
AOA	GATCO
AOPA	HCAP
BA	HCGB
BAE Systems	Heavy Airlines
BALPA	Isle of Mann CAA
BBAC	LAA
BBGA	Low Fares Airline
BGA	NATS
BHA	NCHQ
BHPA	PPL/IR
BMAA	UAVS
BMFA	UKAB
BPA	UKFSC
CAA	

Table 12 - NATMAC

A2.6 Parish and Town Councils

Parish and Town Councils	
Abingdon on Thames	Hornton
Adderbury	Horspath
Adwell	Horton-cum-Studley
Aldsworth	Ickford
Alvescot	Idbury

Parish and Town Councils	
Ambrosden	Inglesham
Ampney Crucis	Ipsden
Ampney St Mary	Islip
Ampney St Peter	Kelmscott
Appleford	Kemble
Appleton-with-Eaton	Kempsford
Ardington and Lockinge	Kencot
Ardley	Kennington
Arcott	Kiddington with Asterleigh
Ascott-under-Wychwood	Kidlington
Ashley	Kidmore End
Ashton Keynes	Kingham
Asthall	Kings Sutton
Aston Rowant	Kingston Bagpuize with Southmoor
Aston Tirrold and Aston Upthorpe	Kingston Lisle
Aston, Cote, Shifford and Chimney	Kirtlington
Avening	Langford
Aynho	Latton
Bagendon	Launton
Baldons (Toot and Marsh)	Leafield
Bampton	Lechlade
Banbury	Leigh
Barford St John and St Michael	Letcombe Bassett
Barnsley (Cotswold)	Letcombe Regis
Barrington	Lewknor

Parish and Town Councils	
Baulking	Little Coxwell
Baunton	Little Farringdon
Beckley and Stowood	Little Milton
Begbroke	Little Rissington
Benson	Little Tew
Berinsfield	Little Wittenham
Berrick Salome	Littlemore
Besselsleigh	Littleworth
Bibury	Long Wittenham
Bicester Town	Longcot
Binfield Heath	Longworth
Bisley-with-Lypiatt	Lower Heyford
Bix and Assendon	Lyford
Black Bourton	Lyneham
Blackbird Leys	Mapledurham
Blackthorn	Marcham
Bladon	Marston Meysey
Blenheim	Merton
Bletchingdon	Meysey Hampton
Blewbury	Middle Aston
Bloxham	Middleton Cheney
Blunsdon St Andrew	Middleton Stoney
Boarstall	Milcombe
Bodicote	Milton
Bourton-on-the-Water	Milton (Abingdon)

Parish and Town Councils	
Bourtons	Milton-under-Wychwood
Brightwell Baldwin	Minchinhampton
Brightwell-cum-Sotwell	Minster Lovell
Brimpsfield	Miserden
Britwell Salome	Mixbury
Brize Norton	Mollington
Broadwell	Moulsford
Broughton	Nettlebed
Bruern	Newbottle
Buckland	Newington
Bucknell	Newton Purcell
Burford	Noke
Buscot	North Aston
Carterton	North Cerney
Cassington	North Hinksey
Castle Eaton	North Leigh
Caversfield	North Moreton
Chacombe	North Newington
Chadlington	Northleach with Eastington
Chalford	Northmoor
Chalgrove	Nuffield
Charlbury	Nuneham Courtney
Charlton-on-Otmoor	Oakley
Charney Bassett	Oaksey
Chastleton	Oddington

Parish and Town Councils	
Checkendon	Old Marston
Chedworth	Over Norton
Cherington	Overthorpe
Chesterton	Oxford, unparished area
Childrey	Piddington
Chilson	Pishill with Stonor
Chilton	Poole Keynes
Chinnor	Poulton
Chipping Norton	Prescote
Cholsey	Preston (Cotswold)
Churchill and Sarsden	Pusey
Cirencester	Pyrton
Clanfield	Quenington
Clapton	Radley
Claydon with Clattercote	Ramsden
Clifton Hampden	Rendcomb
Coates	Risinghurst and Sandhills
Coberley	Rodmarton
Cold Aston	Rollright
Colesbourne	Rotherfield Greys
Coleshill	Rotherfield Peppard
Coln St Aldwyns	Rousham
Coln St Dennis	Salford
Combe	Sandford St Martin
Compton Abdale	Sandford-on-Thames

Parish and Town Councils	
Compton Beauchamp	Sapperton
Cornbury and Wychwood	Shabbington
Cornwell	Shellingford
Cottisford	Shennington with Alkerton
Cowley	Sherborne
Crawley (West Oxfordshire)	Shilton
Cricklade	Shiplake
Cropredy	Shipton-on-Cherwell and Thrupp
Croughton	Shipton-under-Wychwood
Crowell	Shirburn
Crowmarsh	Shotteswell
Crudwell	Shrivenham
Cuddesdon and Denton	Shutford
Culham	Sibford Ferris
Cumnor	Sibford Gower
Curbridge and Lew	Siddington
Cuxham with Easington	Somerford Keynes
Daglingworth	Somerton
Deddington	Sonning Common
Denchworth	Souldern
Didcot	South Cerney
Dorchester	South Hinksey
Down Ampney	South Leigh
Drayton (Abingdon)	South Moreton
Drayton (Banbury)	South Newington

Parish and Town Councils	
Drayton St Leonard	South Stoke
Driffield	Southrop
Ducklington	Sparsholt
Duns Tew	Spelsbury
Duntisbourne Abbots	Stadhampton
Duntisbourne Rouse	Standlake
East Challow	Stanford in the Vale
East Hagbourne	Stanton Harcourt
East Hanney	Stanton St John
East Hendred	Steeple Aston
Eastleach	Steeple Barton
Eaton Hastings	Steventon
Edgeworth	St Helen Without
Elkstone	Stoke Lyne
Elsfield	Stoke Row
Enstone	Stoke Talmage
Epwell	Stonesfield
Evenley	Stratton Audley
Ewelme	Sunningwell
Eye and Dunsden	Sutton Courtenay
Eynsham	Swalcliffe
Fairford	Swerford
Farmington	Swinbrook and Widford
Fawler	Swyncombe
Fawley	Syde

Parish and Town Councils	
Fencott and Murcott	Sydenham
Fernham	Tackley
Fifield	Tadmarton
Filkins and Broughton Poggs	Taynton
Finmere	Tetsworth
Finstock	Thame
Forest Hill with Shotover	Tiddington with Albury
Freeland	Towersey
Frilford	Turkdean
Fringford	Uffington
Fritwell	Upper Heyford
Fulbrook	Upper Rissington
Fyfield and Tubney	Upton
Garford	Wallingford
Garsington	Wantage
Glympton	Warborough
Godlington	Wardington
Goosey	Warkworth
Goring Heath	Watchfield
Goring-on-Thames	Waterperry with Thomley
Gosford and Water Eaton	Waterstock
Grafton and Radcot	Watlington
Great Coxwell	Wendlebury
Great Faringdon	West Challow
Great Haseley	West Hagbourne

Parish and Town Councils	
Great Milton	West Hanney
Great Rissington	West Hendred
Great Tew	Westcote
Grove	Westcote Barton
Hailey	Weston-on-the-Green
Hampnett	Westwell
Hampton Gay and Poyle	Wheatfield
Hanborough	Wheatley
Hannington	Whitchurch-on-Thames
Hanwell	Wigginton
Hardwick with Tusmore	Windrush
Hardwick-with-Yelford	Winson
Harpsden	Winstone
Harwell	Withington
Hatford	Witney
Hatherop	Woodcote
Hazleton	Woodeaton
Henley-on-Thames	Woodstock
Hethe	Woolstone
Heythrop	Wootton (Vale of White Horse)
Highmoor	Wootton (West Oxfordshire)
Highworth	Worminghall
Hinton Waldrist	Worton
Holton	Wroxton and Balscote
Holwell	Wytham

Parish and Town Councils	
Hook Norton	Yanworth
Horley	Yarnton

Table 13 - Parish & Town Councils

A3 The Consulted Proposal for LOA CAS Design

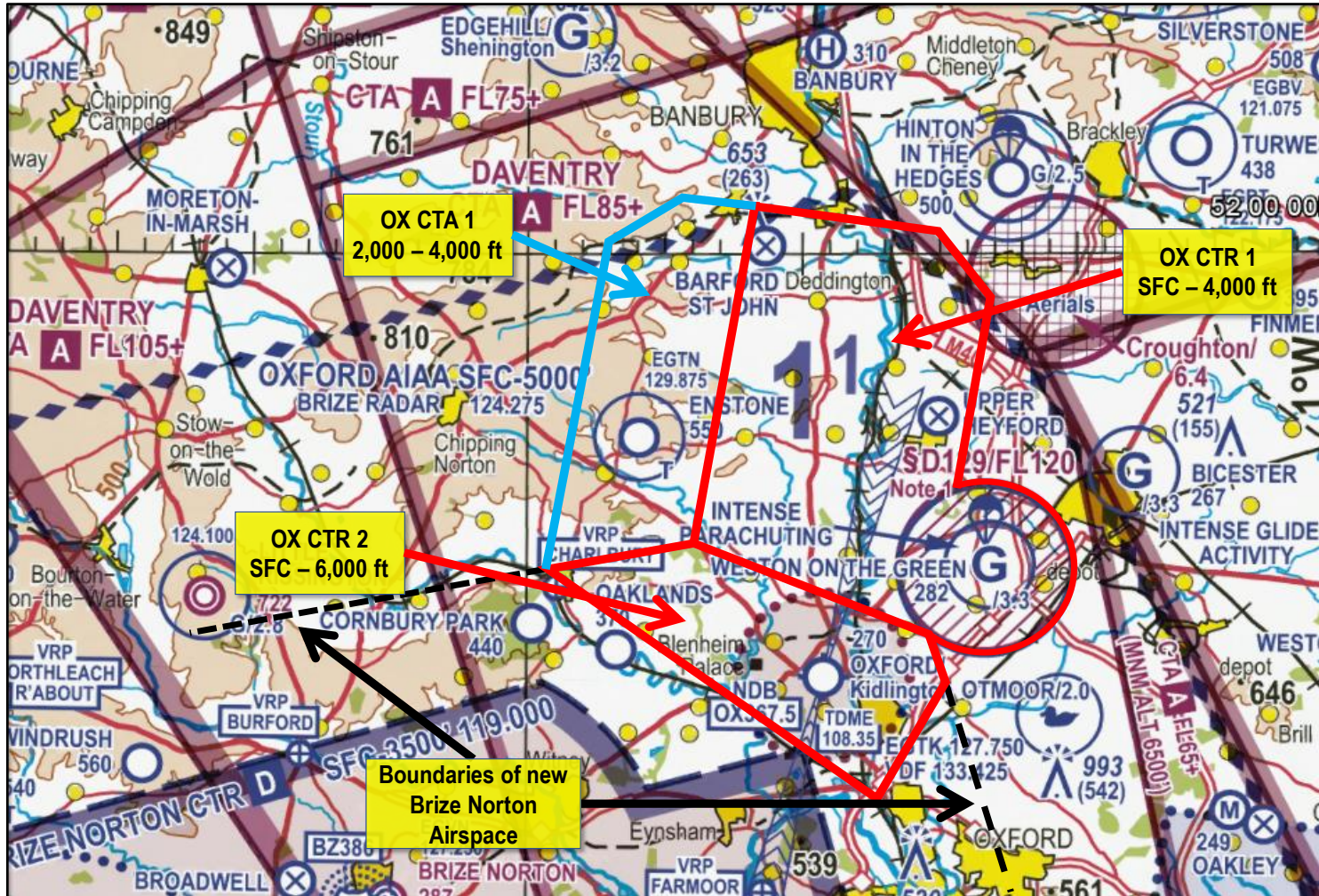


Figure 5 - Consulted CAS Design Concept

A4 Review of Proposed Alternative Suggestions

Category	Key Response Theme/ Suggested Changes to Proposed Design	Implications of Consultees' Suggested Changes	Design Modification Intended for CAA Proposal Submission
Redesign	<ul style="list-style-type: none"> – Simplify the airspace design. – LOA should ensure that the Class D proposed is the minimum required. – Extend the radius of the ATZ to 2.5nm – Utilise steeper descent gradients (5.5°). – Adapt the Missed Approach Procedure (MAP) for Runway 19 to avoid overflying built up areas. – CAS should be applied in layers. – Redesign the procedures for LOA and BZN so they don't conflict. – The north-south boundary between CTA 1 and CTR 1 should be moved 2nm to the east to allow downwind extensions. – The approach to Runway 01 should not have a 4nm section where aircraft maintain 1,500ft AMSL. – Redesign airspace to reduce the impact on gliding clubs. – Reshape CTA 1 and 2 to allow aircraft to pass more easily to the south east. 	<p>The LOA airspace design is partially predicated on the airspace design for BZN. The proposed design used for consultation was the minimum area necessary to encompass the majority of the primary and secondary protection areas for the stated RNAV procedures, in line with CAA policy. The ATZ dimensions are defined by the ANO and cannot be arbitrarily increased without a longer runway. The primary MAP designs is expected to be used infrequently.</p>	<p>In light of the consultation responses, LOA is looking again at the design of its proposed procedures to ascertain if steeper RNAV approaches are possible to both runways. The level section of the Runway 01 approach is also being reviewed to remove the level section, but this is dependent upon the revision of the BZN airspace volume; this work is currently being completed as part of the BZN ACP that is running in parallel to the LOA project.</p> <p>The intention is to modify the proposed airspace categorisation and boundaries to minimise or remove choke points and to provide a greater level of access for suitably equipped GA aircraft. The final design will be dependent upon the volume of BZN airspace that is necessary to protect their intended procedures. LOA believes it might be possible, given MOD agreement, to reach an agreement with BZN that prioritises the use of procedures that, on the</p>

Category	Key Response Theme/ Suggested Changes to Proposed Design	Implications of Consultees' Suggested Changes	Design Modification Intended for CAA Proposal Submission
	<ul style="list-style-type: none"> – LOA should move the Runway 01 approach to the south by 0.5-1 mile to avoid overflying built up areas. 		majority of occasions, will remove any confliction problem.
Reduce size of airspace proposed	<ul style="list-style-type: none"> – Reduce airspace to create a fair balance. – Reduce airspace in line with the volume of movements. – Remove CTA 1. – Remove all airspace except CTR 2. 	It is not possible to determine a what a fair balance might be or align this with volumes of movements. There are many other competing priorities that must be considered; such a simplistic approach would be unrealistic.	In light of the consultation responses, LOA have taken steps to modify the proposed volume of airspace depicted in the consultation documents. The intention is to modify the airspace classification and make adjustments to the lateral dimensions to minimise or remove choke points and to provide a greater level of access for suitably equipped GA aircraft.
Process	<ul style="list-style-type: none"> – LOA should completely restart the ACP process under CAP 1616. 	The LOA ACP was a legacy project as far as CAP 1616 is concerned. The CAA decided which projects needed to move to the new process and LOA remained on the CAP 725 process.	LOA has listened to the consultees and has taken steps to modify its proposed airspace categorisation and boundaries to minimise or remove choke points and to provide a greater level of access for suitably equipped GA aircraft. The final proposal for CAA submission seeks to minimise any risk of collision on the final approach.
	<ul style="list-style-type: none"> – LOA should allow sufficient time to assess the effectiveness of the listening squawk before instituting an ACP. 	The introduction of a listening squawk was never intended to be a substitute for the ACP.	

Category	Key Response Theme/ Suggested Changes to Proposed Design	Implications of Consultees' Suggested Changes	Design Modification Intended for CAA Proposal Submission
	<ul style="list-style-type: none"> – LOA should undertake a full environmental impact assessment. 	<p>An environmental assessment was included in the consultation materials and this was conducted in line with regulatory requirements. This ACP is not contingent on traffic volumes or significant movement of traffic patterns.</p>	
	<ul style="list-style-type: none"> – LOA should undertake a modelling analysis of the risk of collision for aircraft outside of CAS. 	<p>Modelling the risks of collision outside of CAS would be time consuming and highly subjective. The outputs from such an assessment would not be valid if any variables or constraints changed, perhaps due to changing traffic volumes or one or many external influences beyond LOAs control.</p>	
	<ul style="list-style-type: none"> – The ACP should be delayed until the implications of a third runway at London Heathrow Airport (LHR) have been determined. 	<p>This ACP is not contingent upon the activity levels or decisions related to LHR.</p>	

Category	Key Response Theme/ Suggested Changes to Proposed Design	Implications of Consultees' Suggested Changes	Design Modification Intended for CAA Proposal Submission
	<ul style="list-style-type: none"> – LOA should engage the CAA to facilitate a discussion between all stakeholders. 	<p>The Regulator would not facilitate a discussion between stakeholders that might allow either side to influence its decision before the full CAP 725 or CAP 1616 process is followed, and the facts are presented to the CAA for assessment.</p>	
Creation of a known traffic environment	<ul style="list-style-type: none"> – Utilise an ADS-B system, FLARM technology, Radio Advisory Zone (RAZ), Radio Mandatory Zone (RMZ), Transponder Mandatory Zone (TMZ), Class E or a combination of these instead of Class D airspace. 	<p>LOA has considered the RMZ/TMZ/Class E option as an alternative to the option of Class D airspace as shared during the consultation process.</p>	<p>LOA has listened to the consultees and has taken steps to modify its proposed airspace categorisation and boundaries to minimise or remove choke points and to provide a greater level of access for suitably equipped GA aircraft. Its design will include the suggestions of the GA community whose stated preference during consultation was a Class E, RMZ and TMZ solution, rather than a Class D design.</p>
	<ul style="list-style-type: none"> – LOA should operate a time-based Class D to allow daytime VFR operations in Class G. 	<p>A time-based solution is not considered practical from LOA's perspective. Additionally, there is no way to dynamically manage a time-based solution in UK airspace.</p>	
	<ul style="list-style-type: none"> – LOA should pay £5,000 per cubic km per year for Class D. 	<p>The decision to charge for use of airspace is a matter for the CAA and is outside of the scope of this ACP.</p>	

Category	Key Response Theme/ Suggested Changes to Proposed Design	Implications of Consultees' Suggested Changes	Design Modification Intended for CAA Proposal Submission
Enhanced cooperation	Combine or co-locate ATC services for LOA and BZN (and RAF Benson) to enhance cooperation.	Co-locating services would not be possible due to differing military and civil regulations and requirements.	In light of the consultation responses, LOA has taken steps to modify its proposed airspace classification and has made modifications to the lateral boundaries to minimise or remove choke points and to provide a greater level of access for suitably equipped GA aircraft. As part of this proposal, it will also be necessary to enhance cooperation between local airspace users through the development of LoA. LOA will contact local airspace users to develop these agreements in due course.
	– Procedural issues between LOA and BZN should be resolved with a new Letter of Agreement (LoA).	Letters of Agreement will be necessary but will not themselves resolve the conflicts and safety issues.	
	– LOA should use the existing BZN Class D airspace to allow aircraft to reduce altitude before commencing procedures.	The use of BZN airspace by LOA aircraft will further add complexity and create additional confliction issues.	
	– LOA should consider the requirements of all airspace users before redesigning the proposed airspace.	LOA is considering the requirements of all airspace users; that is the intent of the consultation exercise.	
	– LOA should engage with the British Gliding Association (BGA) and redesign the proposed airspace accordingly.	All stakeholders have an opportunity to influence the design of any airspace through the consultation process.	
	– LOA should campaign to increase the use of the Listening Squawk prior to increasing CAS	As described in the consultation document, the Listening Squawk has been widely publicised and used for some time before the consultation. This alone did not address LOA concerns.	

Category	Key Response Theme/ Suggested Changes to Proposed Design	Implications of Consultees' Suggested Changes	Design Modification Intended for CAA Proposal Submission
	<ul style="list-style-type: none"> - LOA should provide assurances that all local GA will have access to the airspace via LoAs. 	<p>As part of this proposal it will be necessary to enhance cooperation between local airspace users through the development of LoAs.</p>	
ATC Manpower	<ul style="list-style-type: none"> - LOA should increase controller numbers to handle workload rather than institute CAS. - Prior to instituting an airspace change LOA should provide assurances that there is sufficient controlling manpower to facilitate the level of transits expected. 	<p>LOA's consulted proposal and final airspace design may require additional manpower to facilitate as many transits as possible; LOA is currently assessing the exact requirement.</p>	<p>Having taken the consultation responses into account, LOA's final airspace design for submission to the CAA will consist of a smaller volume of airspace consisting of an RMZ/TMZ. This will be smaller in volume than the proposed Class D structure shown in the proposal and consequently there will be less of a requirement to facilitate large numbers of transits.</p>
Impact on Enstone Airfield	<ul style="list-style-type: none"> - LOA should raise the CTA over Enstone to 2,500ft AMSL to facilitate overhead joins. 	<p>This would have been possible with the original consulted design but would require an increase the size of the Class D airspace volume with boundaries moving out slightly to ensure appropriate containment.</p>	<p>With the final proposal to be submitted to the CAA, the proposed RMZ/TMZ volume or airspace will not sit above Enstone.</p>
Close LOA	<ul style="list-style-type: none"> - LOA should cease to operate as an airport and should instead be used for housing or a science and industry park. - LOA should move to a more suitable location to suit its needs. - LOA should move all of its operations to BZN. 	<p>All these alternatives relate to closing LOA are unrealistic and would lead to significant damage to local employers as well as the local economy.</p>	<p>LOA will continue to operative with proposed final airspace design as described in earlier rows.</p>

Category	Key Response Theme/ Suggested Changes to Proposed Design	Implications of Consultees' Suggested Changes	Design Modification Intended for CAA Proposal Submission
	<ul style="list-style-type: none"> – LOA should fly its IFR approaches to a different airport. – All activity that LOA consider unsafe should cease. 		
VFR aircraft and helicopter operations	<ul style="list-style-type: none"> – LOA should consider the use of specific east-west/north-south VFR corridors for helicopters and VFR aircraft. 	Whilst this might be possible with the original consulted proposal it would add a great deal of complexity and increase the risk of infringements.	Such a solution is no longer required given the fact that LOA has analysed the consultation responses and is reviewing and re-designing its intended final proposal
Independence	<ul style="list-style-type: none"> – LOA should employ independent consultants to consider all viewpoints. 	All viewpoints are fully considered during an ACP consultation. From the responses received, it was clear that many responders failed to understand the difference between early engagement and the formal consultation required by CAP 725.	Independent consultants are employed by LOA and do take into account the viewpoints of all stakeholders. An independent consultant on any ACP suggests alternatives to the client and takes client instructions. It is the Sponsor's responsibility to makes all decisions on design and the consultant's responsibility to complete the work as contracted. This will also be the case during the final proposal preparations.
Simulators	<ul style="list-style-type: none"> – LOA should utilise simulators for their training operations. 	Simulators are utilised for training purposes in accordance with the mandated syllabi.	
Increase size of CAS	<ul style="list-style-type: none"> – In order to reduce the risk of airspace infringement, LOA should redesign the airspace to include the 	It is our assessment that any increase in airspace volume would not be well received by those who objected to the	LOA has listened to the consultees and has taken steps to re-design its consulted proposal to mitigate the key

Category	Key Response Theme/ Suggested Changes to Proposed Design	Implications of Consultees' Suggested Changes	Design Modification Intended for CAA Proposal Submission
	<p>sliver of airspace between CTR 2 and DTY CTA.</p>	<p>proposal presented in the consultation material.</p>	<p>issues raised by responders during the consultation process. The final proposal will remove many of the constrictions that responders said would lead to infringement. In any circumstance, the GA community should continually strive to reduce incidences of airspace infringement.</p>

Table 14 - Review of Proposed Alternative Suggestions