

## 2023 Competition Rules - Prohibition of Flight in ATZ's

### Background

For the 2022 BGA Rules for Rated Competitions, the Competitions Committee proposed to add ATZ's to rule 5.10.3 Airspace Types Excluded. In addition, ATZs were added to Rule 5.10.5 so that Directors could negotiate and brief block exemptions for them.

Other rules were modified at this time. In particular, Rule 1.1 was strengthened to emphasise the need for Directors to implement the rules as written and to give Directors the discretion to penalise unsporting behaviour as detailed in Rule 2.1.8.

These proposed changes were promulgated in January 2022, with changes clearly identified in the preface to the rules, and a short consultation period started. During the consultation there was just one representation made against these changes using some of the arguments discussed below. The Competitions Committee accepted one of the counter proposals, that Rule 5.10.4 should be amended to allow engine-equipped gliders to start their engines and depart without penalty as an alternative to landing once inside an ATZ, but decided that, on balance, the fundamental change was justified and the rules for 2022 were confirmed and published. No further input was received.

During the 2022 competition season there were a number of pilots who objected to the rule and the organisers of one rated competition refused to implement it. After discussion, the Competitions Committee reluctantly agreed to allow organisers of Nationals Competitions to suspend the rule in their Local Procedures in 2022 if they wished to do so. It was decided to revisit the rule for the 2023 season.

The Competitions Committee has reconsidered the ATZ prohibition rule in preparing the 2023 Rules. The arguments for and against made in various representations are laid out below.

#### 1. Pilots have the right to fly within ATZ's within Class G Airspace

According to CAP393 Air Navigation Order Section 3 Article 11 (see appendix), pilots are allowed to enter Aerodrome Traffic Zones subject to complying with paragraphs 3, 4, and 5 of the article as appropriate. Depending upon the status of the aerodrome and the services provided, pilots must either request and receive permission to enter, or obtain aerodrome information to fly safely within the zone. There are other provisions with which the pilot must comply.

The argument has been made that the gliding community must exercise this privilege in order to preserve it. The Competitions Committee accepts this argument in principle, but the competition community numbers only around 5% of the total membership, and flights in rated competitions account for less than 20% of all cross-country gliding in the UK. The CC therefore considers that the prohibition of soaring inside, or passing through ATZs, in rated competitions does not materially undermine the gliding community's right to fly within ATZs.

#### 2. Pilots should be able to enter ATZs for safety reasons

It is argued that it is much safer to land on an airfield than in a farmer's field. Competition pilots fly towards airfields when getting low in order to provide safe landing options.

It should be noted that the proposed rule does NOT prohibit this behaviour. Pilots may continue to fly towards ATZ's and may use aerodromes within ATZs to conduct safe landings or turbo starts. Depending upon the length of the runways, ATZs are either 2 or 2.5 miles in radius. The pilot will need around 500ft to 750ft outside the ATZ when committing to enter and make a safe landing.

Whilst some pilots may accept a lower height before committing to a field landing, it is worth noting that a pilot could easily find themselves contravening low flying regulations, even within an ATZ. It is clear that we should always fly within the UK legal framework, especially in competitions where traces are more likely to be scrutinised.

The Competition Committee considers that pilots make tactical decisions of this nature all the time and as the rules do not prohibit safe landing within ATZ's the rule does not compromise safety in this respect.

### 3. Flight within ATZs requires use of a radio

CAP393 requires the use of radio to obtain permission to enter an ATZ or to obtain information necessary for the safe conduct of the flight, to report position and inform when leaving. Neither the BGA nor the Competition Rules require aircraft to be radio equipped nor pilots to have an FRTOL which would be necessary to comply with this law.

In either case above, it would be impossible for a pilot without a FRTOL to enter an ATZ in compliance with the law. Unless all competing aircraft and pilots are so equipped, the contest field is not level. The Competition Committee considers that this situation is unfair.

### 4. Traffic conditions and other pressures will determine entry

Even if all pilots have radios and have a FRTOL, it is not necessarily the case that the controlling authority will give permission to enter and operate within an ATZ equally to all pilots.

This is the very same reason that Class D airspace is prohibited, and the Competitions Committee considers that this situation is unfair.

At Airfields where there is only a Flight Information Service, or an Air/Ground Radio Service, the pilot must make contact and obtain information, which could reasonably be expected to include altimeter setting, runway direction, circuit direction, activity, etc. to allow the flight inside the ATZ to be conducted safely. It then becomes the pilot's responsibility to take note of, and act upon, that information. It is possible that the information received could mean that remaining clear at that time would be advisable. This is also unfair in a competition.

### 5. Pilots do not consistently talk to the controlling authority when entering an ATZ

There have been examples where this is the case. Pilots sometimes assume that if permission is given to one pilot, it will apply to them too. Others have entered unannounced believing it's OK to do so.

Nor is it true, as has been argued, that ATZ penetrations by competition gliders would likely be by single gliders and infrequently. Gliders are unlikely to seek penetration of ATZs when soaring conditions are good. When conditions are difficult, however, it is much more likely that gliders will find themselves looking for lift below 2,000ft. In such conditions in competitions, gliders are very likely to gather into gaggles and proceed around the task helping each other to find lift. The likelihood, therefore, of more than one glider seeking to use an ATZ at the same time, or within a short period, is high.

Several years ago, there was an airspace infringement at Barkston Heath where several gliders flying in a competition entered the ATZ, some with permission. Others did not obtain permission and infringed the airspace. This incident was detrimental to gliding's relations with military controllers.

Recently, several aerodromes have applied for additional controlled airspace around their ATZs to enhance safety for their users and reduce the risk of conflicts with GA. Norwich and

Farnborough were successful in this, so far Oxford and Brize are not. It is expected that these applications will return as well as others e.g. Lincoln.

The Competitions Committee considers that the competition community should avoid giving aerodrome operators data that they can use as justification for an airspace change.

6. [Entering an ATZ with air ground service does not require permission](#)

It has been argued that it is fine for a task group to enter an ATZ with an air ground service by simply telling them that you are entering by radio. The law allows this, but it is not good for the BGA relationship with other airspace users and could be seen as arrogant.

The Competitions Committee considers that all pilots should always display good airmanship and that pilots should strive to keep all airspace users on side in order to garner support for gliding activities and protect its wider freedoms.

As directors are free to negotiate and promulgate exceptions where ATZ operators are amenable, this behaviour is patently egregious to other airspace users.

7. [Climbing in an ATZ, especially near the circuit, is hazardous](#)

Pilots using an ATZ tend to fly defined procedures and circuits. Where the aerodrome is controlled, these pilots rely upon instructions for the safe conduct of their flight. They are likely to be focussed on the operation of the aircraft, their instruments, and their radio and would not expect traffic to be operating differently. They do not expect to be in conflict with other aircraft within the ATZ.

Glider pilots entering an ATZ are unlikely to have read the specific Standard Operating Procedures (SOPs) for the ATZ beforehand and, if they do obtain permission or information, may still be unfamiliar with the patterns flown. Climbing in or near the join or the circuit pattern increases workload for pilots and controllers, is hazardous, and should be avoided.

The Competition Committee considers that this is a strong argument against allowing entry in the normal conduct of the task.

8. [ATZs are not always active or manned](#)

The argument is well made that ATZs are not always active or extensively used. This argument is accepted. The proposed rules already allow the organisers to negotiate block exemptions or conditions for entry with the controlling authority of any aerodromes whose ATZs they wish to use. These will be promulgated at briefings and on task sheets.

The Competitions Committee considers that these provisions should stand and that a change to the rule be made that inactive ATZs may also be briefed without consultation.

Organisers will be advised that they need a high level of assurance that an ATZ is inactive and, therefore, safe to enter before they brief it as non-penalty.

9. [Organisers have a responsibility for the safety of the pilots](#)

An argument has been made that organisers cannot ensure the safety of the competitors if ATZs are prohibited.

The Competitions Committee hears this but does not consider that pilots are put at risk by this aspect of the rule as they may still land or engine retrieve from aerodromes or fields within an ATZ without penalty. Indeed, the Committee considers that the use of active ATZs introduces unnecessary risk.

The organisation should ensure that their tasks are set defensively away from controlled airspace as far as practicable. Directors have little influence once the pilots are on task and,

ultimately, the law states that the safe conduct of the flight is the sole responsibility of the pilot in charge.

#### 10. Tasks cannot be set without going near or through ATZs

It is argued that tasks cannot be set without going through or near ATZs. The competitions committee does not accept this argument. All tasks set in National competitions that were published on See You in the last 7 years have been examined. The Committee considers that, where they task near or through ATZs, they could all have been set to avoid ATZs, in the same areas, and with a similar task length. This can be achieved with either the selection of different turn points or the inclusion of control points to divert competitors around and away from ATZs.

### Summary

The Competitions Committee has considered all the representations that they have received on this rule and has considered at length the arguments described above.

The remit of the Competitions Committee requires it to develop competition rules *“that make competition at all levels fair, as easy and cost effective as possible to organise, and appropriately rigorous at each level”*. As a consequence, much of the UK rule book is concerned with creating a level playing field in a sport where the conditions on task can vary dramatically and sometimes unpredictably. Pilots expect to meet these soaring challenges but should not be faced with obstacles that they could not fairly anticipate. Refusal to enter an ATZ, or a decision not to on safety grounds, is just this kind of situation. The rule to prohibit flight within active ATZs is consistent with this remit as it promotes fairness.

In making rules, the Competitions Committee also places a great deal of importance on maintaining safety amongst competitors and other parties. Active ATZs concentrate aircraft into a small area and, whilst their runways can offer a potentially safe place to land, there are additional risks created by the interaction between the aircraft involved. On balance the Committee considers that this rule change increases safety rather than diminishes it.

Further, the Competitions Committee also considers the optics of our competition activities as seen by other stakeholders: Other airspace users, airfield owners and operators, the public, and the CAA. Introduction of finish rings, low flying, prescribed approaches to finish lines and landing patterns, penetration of Class A – D airspace, danger areas, drop zones, and now ATZs are all cases in point. If we wish to keep as much freedom to fly within the existing scope of Class G airspace, then we must review our rules regularly to promote professionalism as part of being fully responsible members of the flying community.

The Committee considers that the proposed rules should stand in the 2023 rule book with the change described in para 8 above.

Again, there will be a consultation period in February and March 2023. And, in addition, there will be an Organisers Seminar held at the 2023 BGA conference in February where discussion of this issue will be on the agenda. New arguments both for and against the rule will be considered before final publication of the 2023 rules.

**Flight within aerodrome traffic zones**

11.—(1) This rule applies in relation to such aerodromes described in Column 1 of Table 1 as are notified for the purposes of this rule and at such times as are specified in Column 2 of the Table.

**Table 1**

<i>Table Column 1</i>	<i>Column 2</i>
(a) A Government aerodrome.	At such times as are notified.
(b) An aerodrome having an air traffic control unit or flight information service centre.	During the notified hours of watch of the air traffic control unit or the flight information service centre.
(c) A national licensed aerodrome or an EASA certificated aerodrome having an air/ground communications service unit with aircraft.	During the notified hours of watch of the air/ground communications service unit.

(2) An aircraft must not fly, take off or land within the aerodrome traffic zone of an aerodrome unless the commander of the aircraft has complied with paragraphs (3), (4) or (5), as appropriate.

(3) If the aerodrome has an air traffic control unit the commander must obtain the permission of that unit to enable the flight to be conducted safely within the aerodrome traffic zone.

(4) If the aerodrome provides a flight information service the commander must obtain information from the flight information centre to enable the flight to be conducted safely within the aerodrome traffic zone.

(5) If there is no flight information centre at the aerodrome the commander must obtain information from the air/ground communication service to enable the flight to be conducted safely within the aerodrome traffic zone.

(6) The commander of an aircraft flying within the aerodrome traffic zone of an aerodrome must—

- (a) cause a continuous watch to be maintained on the appropriate radio frequency notified for communications at the aerodrome; or
- (b) if this is not possible, cause a watch to be kept for such instructions as may be issued by visual means; and
- (c) if the aircraft is fitted with means of communication by radio with the ground, communicate the aircraft's position and height to the air traffic control unit, the flight information centre or the air/ground communications service unit at the aerodrome (as the case may be) on entering the aerodrome traffic zone and immediately prior to leaving it.

**Movement of aircraft on uncontrolled aerodromes**

12.—(1) An aircraft must not taxi on the apron or the manoeuvring area of an uncontrolled aerodrome without the permission of either—

- (a) the person in charge of the aerodrome; or
- (b) the flight information centre notified as being on watch at the aerodrome.