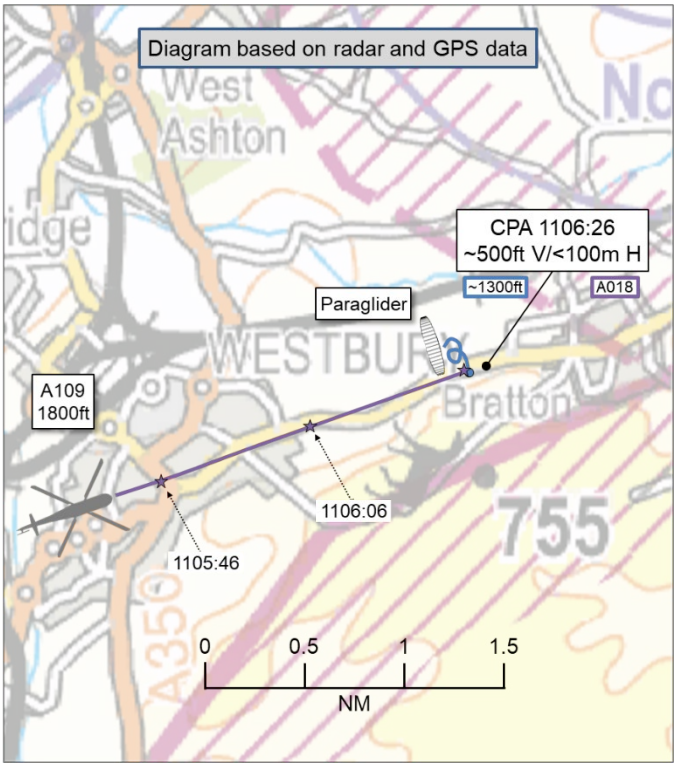
AIRPROX REPORT No 2024147

Date: 30 Jun 2024 Time: 1106Z Position: 5116N 00209W Location: 3NM SSW Keevil

PART A: SUMMARY OF INFORMATION REPORTED TO UKAB

Recorded	Aircraft 1	Aircraft 2
Aircraft	Paraglider	A109
Operator	Civ Hang	Civ Comm
Airspace	London FIR	London FIR
Class	G	G
Rules	VFR	VFR
Service	None	None
Altitude/FL	~1300ft	1800ft
Transponder	Not fitted	A, C, S+
Reported		
Colours	Yellow, red	White
Lighting	None	Nav, beacon, strobes, landing
Conditions	VMC	VMC
Visibility	>10km	>10km
Altitude/FL	1400ft	1900ft
Altimeter	QNH	QNH (1014hPa)
Heading	270°	070°
Speed	10kt	150kt
ACAS/TAS	FLARM	TAS
Alert	None	None
Separation at CPA		
Reported	250ft V/50m H	500ft V/0.5NM H
Recorded	~500ft V/<100m H	



THE PARAGLIDER PILOT reports that roughly 20 paragliders were soaring at Bratton Camp Hill and adjoining Westbury White Horse Hill in a prevailing wind of 15-25kph. Early in the day, glider pilots were generally constricted to ridge-lift on the face of the hill. Submission of a CANP had been attempted [on the Friday] but the relevant website was reported as not available so a NOTAM alert was not posted.[1] However, Westbury escarpment is commonly flown in westerly-to-northerly winds by hang-gliders and paragliders. At 1100Z, most gliders were soaring up to 500m from the ridge, and 2000ft AMSL.

[The paraglider pilot] was following a GA gliding circuit along the face of the hill and had pushed forward of the ridge to circle in lift when they observed a helicopter approaching from the south-west and following a route along the edge of the hill escarpment. Due to its proximity, and the fact that the helicopter was not changing heading, they turned to approximately 150° towards the hill to avoid conflict and any downwash issues that might have affected the paraglider. As far as can be remembered, the helicopter pilot took no avoiding action. [The paraglider commented that] paraglider pilots are especially cautious around helicopters as it's a non-rigid aircraft and susceptible to downwash/turbulence. Paragliders are also very slow with a trim speed usually in the range of 20kt maximum, so groundspeed into prevailing wind would be very low.

The pilot assessed the risk of collision as 'Medium'.

THE A109 PILOT reports that, having researched the location of the paraglider site, they are deeply perturbed that a paragliding site that has been active for so long is not marked on any UK VFR chart, not listed in the UK AIP ENR 5.5 and no NOTAM was issued on the day for paragliding activity for the situational awareness of other pilots. The paraglider was to the right of the helicopter (1-2 o'clock) and

[1] Guidance provided in UK AIP ENR 1.10 (Para. 5.2.3.3) on the submission of a CANP: Due to the closure of LFC at weekends, activities planned for the weekend should be notified to [Low Flying Coordination] LFC no later than 1600 (1500) on the Friday before [..].

low down at around 1300ft AMSL. They also noticed 3 to 5 paragliders lower down, airborne over the ridge and noted them from a distance of 1 to 2 miles. [The pilot of the A109] was heading 070° at 1900ft. As per the UK VFR chart, the highest point of the ridge is 755ft. They fly with all the lights on all the time, and flashed the landing lights to acknowledge their presence. At no time was safety comprised nor were they in such proximity as to create a collision hazard. Other concerns for the paraglider that they had considered when passing was wake turbulence. The paraglider was low and to the south of them [they recall]. Wind on the day was a south-westerly flow of around 10-15kt and would not have had any influence on the paraglider. [The pilot of the A109 commented that] Boscombe Down was closed and no LARS had been available.

The pilot assessed the risk of collision as 'None'.

Factual Background

The weather at Bristol was recorded as follows:

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METAR EGGD 301120Z AUTO 03006KT 310V080 9999 SCT022 SCT030 OVC037 16/11 Q1015
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A note on UK VFR navigational charts provides the following guidance regarding paragliding sites:

> Symbols depicting Non Winch Launch hang/Para Gliding sites have been removed as they were not an accurate representation of activity on any given day. Airspace users should be aware that single or groups of soaring or motorised Hang/Para Gliders can be found flying anywhere in Class G airspace up to 15,000ft, but concentrated around windward slopes and cliffs.

A NOTAM for a military exercise in the area shown in Figure 1 was active at the time of the Airprox.

> H4165/24
> Q) EGTT/QWELW/IV/BO/W/000/050/5118N00205W004
> A) EGTT B) FROM: 24/06/30 09:30 TO: 24/07/02 12:30
> E) EXER WESSEX STORM. MULTIPLE ACFT WILL CONDUCT HIGH ENERGY MANOEUVRES WI AREA BOUNDED BY: 511605N 0021005W - 511920N 0021002W - 511915N 0015943W - 511602N 0015948W - 511605N 0021005W (COULSTON). ACFT WILL NOT ENTER CONTROLLED AIRSPACE UNLESS UNDER CONTROL OF AN APPROPRIATE ATSU. FOR INFO 07950 294328.
> AR-2024-4282/AU3.
> LOWER: SFC
> UPPER: 5000FT AMSL
> SCHEDULE: 0930-1230

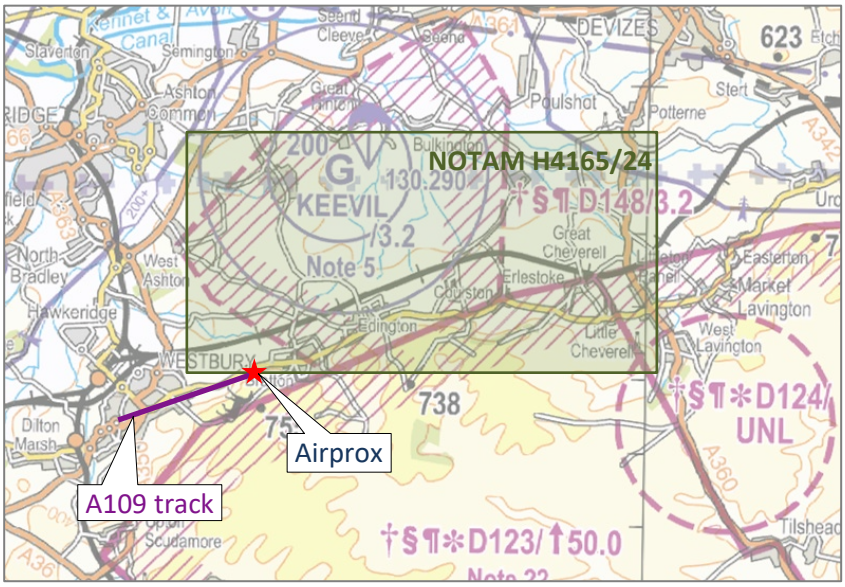


Figure 1 – NOTAM H4165/24

Analysis and Investigation

UKAB Secretariat

An analysis of the NATS radar replay was undertaken and the A109 could be positively identified from Mode S data (Figure 2). The paraglider was not observed on the radar replay.

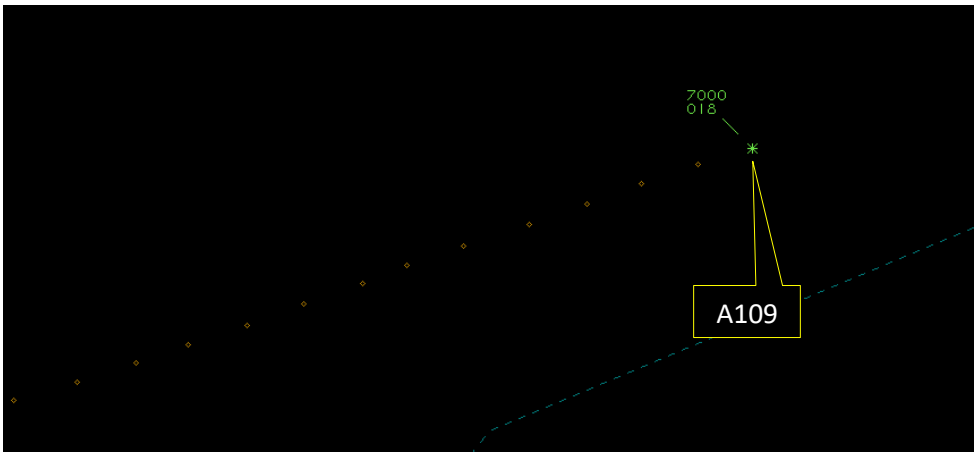


Figure 2 – CPA at 1106:26

The paraglider pilot kindly supplied GPS track data for their flight. The diagram was constructed and the separation at CPA determined by combining the different sources.

The paraglider and A109 pilots shared an equal responsibility for collision avoidance and not to operate in such proximity to other aircraft as to create a collision hazard.[2] If the incident geometry is considered as converging then the A109 pilot was required to give way to the paraglider.[3]

Comments

BHPA

The BHPA understands the paraglider pilot's concerns regarding the proximity of the A109 and whether its rotor-wash was going to affect their canopy's stability and is relieved that the outcome of this incident was uneventful. We also understand that the paraglider pilot tried to submit a NOTAM on the Friday preceding the incident but the CANP website was down. Once again, we see that, although the paraglider pilot had [an EC device] transmitting a signal, this was incompatible with the A109's TAS system and, consequently, no EC situational awareness was available to either pilot.

However, we are very disappointed to learn that the A109 pilot was not in receipt of any radio service and, therefore, could not have been given any warnings of intense paragliding activity at Westbury, one of the UK's premier free-flying sites, nor have been able to have informed an ATC agency of paragliding activity in the area.

The BHPA has spoken to the local BHPA Club which has agreed to discuss a procedure whereby whoever submits the NOTAM for flying activity at Westbury will also telephone Boscombe Down and London Information ATCs to advise them of the activity so that this information may be given to any pilot in receipt of a radio service from those agencies. If the A109 pilot had been receiving a radio service, they may have been made aware of the paragliding activity.

The A109 pilot also stated that as well as identifying the incident paraglider pilot, they “noticed 3-5 other pilots lower down". We submit that, due to the difficulty in accurately identifying very slow moving paragliders against a landscape background, they had not seen the other 14-15 pilots airborne at the same time and yet still chose to continue routeing close by them at a similar altitude.

[2] (UK) SERA.3205 Proximity.
[3] (UK) SERA.3210 Right-of-way (c)(2) Converging.

Although the BHPA acknowledges that the A109 pilot was illuminating their aircraft's lights, a slow moving paraglider with limited manoeuvrability would not have been able to take any meaningful avoiding action even if they had seen the helicopter heading for them.

Finally, the BHPA has a comprehensive information page on its website detailing the procedures for submitting a CANP and the opening times of the LFCC (https://www.bhpa.co.uk/safety/canp/), and will be reminding our membership through our SkyWings magazine of the need to submit a CANP for any weekend and Monday morning flying activity before 1500 on Fridays at the latest.

Summary

An Airprox was reported when a paraglider and an A109 flew into proximity 3NM south-southwest of Keevil at 1106Z on Sunday 30th June 2024. Both pilots were operating under VFR in VMC, neither in receipt of an ATS.

PART B: SUMMARY OF THE BOARD'S DISCUSSIONS

Information available consisted of reports from both pilots, radar photographs/video recordings and GPS data for the flight of the paraglider pilot. Relevant contributory factors mentioned during the Board's discussions are highlighted within the text in bold, with the numbers referring to the Contributory Factors table displayed in Part C.

The Board first considered the actions of the pilot of the paraglider. Members noted that they had attempted to submit a CANP but the relevant website had not been available. A member with particular knowledge of the CANP system explained that the purpose of CANP is a method for civilian pilots to be able to notify military authorities of aerial activity that might have an impact on military low-flying operations. The member explained further that, if the nature of the civilian activity is such that the creation a NOTAM is considered necessary or prudent, or should the number of civilian pilots involved in the activity exceed a certain threshold value, the Military Airspace Management Cell (low flying) (previously LFCC - Low Flying Coordination Cell) may create a NOTAM on behalf of the civilian pilots as a courtesy. Submission of a CANP ought not to be considered as an automatic mechanism for the creation of a NOTAM.

Members agreed that the EC device carried by the pilot of the paraglider would not have been expected to have detected the presence of the A109 (**CF4**). Consequently, members also agreed that the paraglider pilot had not had situational awareness of the presence of the A109 until it had been visually acquired (**CF3**). Members noted that the pilot of the paraglider had believed that they had not been seen and had turned to fly closer to the ridge to increase separation. Members appreciated that the proximity of the A109 had caused them concern (**CF6**).

Members noted the comment made by the pilot of the A109 regarding paragliding activity and pondered the note on UK VFR navigational charts that provides guidance regarding paragliding sites (as reproduced above in the Factual Background section). Members acknowledged the need to strike a balance between the inclusion of pertinent information on navigational charts and the removal of excessive 'clutter' that might obscure other important information. Members felt that it would be wise for all airspace users to have a general awareness of the activities of others with whom they share the airspace and the typical areas in which they might prefer to operate. However, members agreed that the brief note on the chart regarding paragliders had insufficient detail to have assisted pilots with their threat-and-error management when compared to the extent of the paragliding activity in operation on the day in question (**CF1**).

Members next considered the actions of the pilot of the A109 and, in particular, the track that they had chosen. Members agreed that the TAS fitted to the A109 would not have been expected to have detected the presence of the paraglider pilot (**CF4**) and, consequently, agreed that the pilot of the A109 had not had situational awareness of the paraglider pilot until they had been visually acquired (**CF3**). Members noted that the pilot of the A109 reported that they had sighted a paraglider "*to the right of the helicopter*" and "*3 to 5 paragliders lower down, airborne over the ridge and noted them from a distance of 1 to 2 miles*". Members were therefore surprised that the pilot of the A109 had continued to track

through an area of paragliding activity without deviation. Noting that the A109 pilot had been aware that Boscombe Down had been closed, members agreed that it would have been far more prudent to have altered their course to the south, perhaps overhead Boscombe Down, or to the north around the NOTAM'd area, to have ensured a far more comfortable separation from the paragliders.

Members gave further consideration to NOTAM H4165/24. Given that (after CPA) the pilot of the A109 had routed through this area where 'multiple aircraft' had been conducting 'high energy manoeuvres', some members suggested that the pilot of the A109 had not been aware of NOTAM H4165/24 and, as such, may not have noticed a NOTAM for paragliding activity had one been active.

Members returned to their thoughts regarding the actions of the A109 pilot after they had visually acquired several paraglider pilots in the area. In consideration of the disparity between the actual separation at CPA and that reported by the A109 pilot (as having been ½ mile), and that there had been considerably more paraglider pilots operating at that time than had been sighted, some members wondered whether the A109 pilot had visually acquired the paraglider pilot of this Airprox report. Proceeding on the basis that the paraglider pilot sighted had been the correct one, members concluded that the pilot of the A109 had sighted them early enough to have taken decisive action to have increased separation but had elected to have maintained their course. As such, members agreed that the pilot of the A109 had not appreciated the risk of doing so (**CF5**) and agreed that they had not adapted their plan sufficiently to have met the needs of the situation (**CF2**).

In conclusion, members agreed that, whilst it had been unfortunate that a NOTAM had not been raised regarding the paragliding activity, it had been the responsibility of both pilots to have ensured sufficient separation. Members agreed that safety margins had been reduced and that the pilot of the A109 had flown close enough to the paraglider to have caused concern. However, members agreed that the paraglider pilot had taken action in time to have averted a risk of collision. The Board assigned Risk Category C to this event.

PART C: ASSESSMENT OF CONTRIBUTORY FACTORS AND RISK

Contributory Factors:

	2024147			
CF	**Factor**	**Description**	**ECCAIRS Amplification**	**UKAB Amplification**
	Flight Elements			
	• Tactical Planning and Execution			
1	Organisational	• Flight Planning Information Sources	An event involving incorrect flight planning sources during the preparation for a flight.	
2	Human Factors	• Insufficient Decision/Plan	Events involving flight crew not making a sufficiently detailed decision or plan to meet the needs of the situation	Inadequate plan adaption
	• Situational Awareness of the Conflicting Aircraft and Action			
3	Contextual	• Situational Awareness and Sensory Events	Events involving a flight crew's awareness and perception of situations	Pilot had no, late, inaccurate or only generic, Situational Awareness
	• Electronic Warning System Operation and Compliance			
4	Technical	• ACAS/TCAS System Failure	An event involving the system which provides information to determine aircraft position and is primarily independent of ground installations	Incompatible CWS equipment
	• See and Avoid			
5	Human Factors	• Lack of Individual Risk Perception	Events involving flight crew not fully appreciating the risk of a particular course of action	Pilot flew close enough to cause concern
6	Human Factors	• Perception of Visual Information	~~Events involving flight crew incorrectly perceiving a situation visually and then taking the wrong course of action or path of movement~~	Pilot was concerned by the proximity of the other aircraft

Degree of Risk: C.

Safety Barrier Assessment[4]

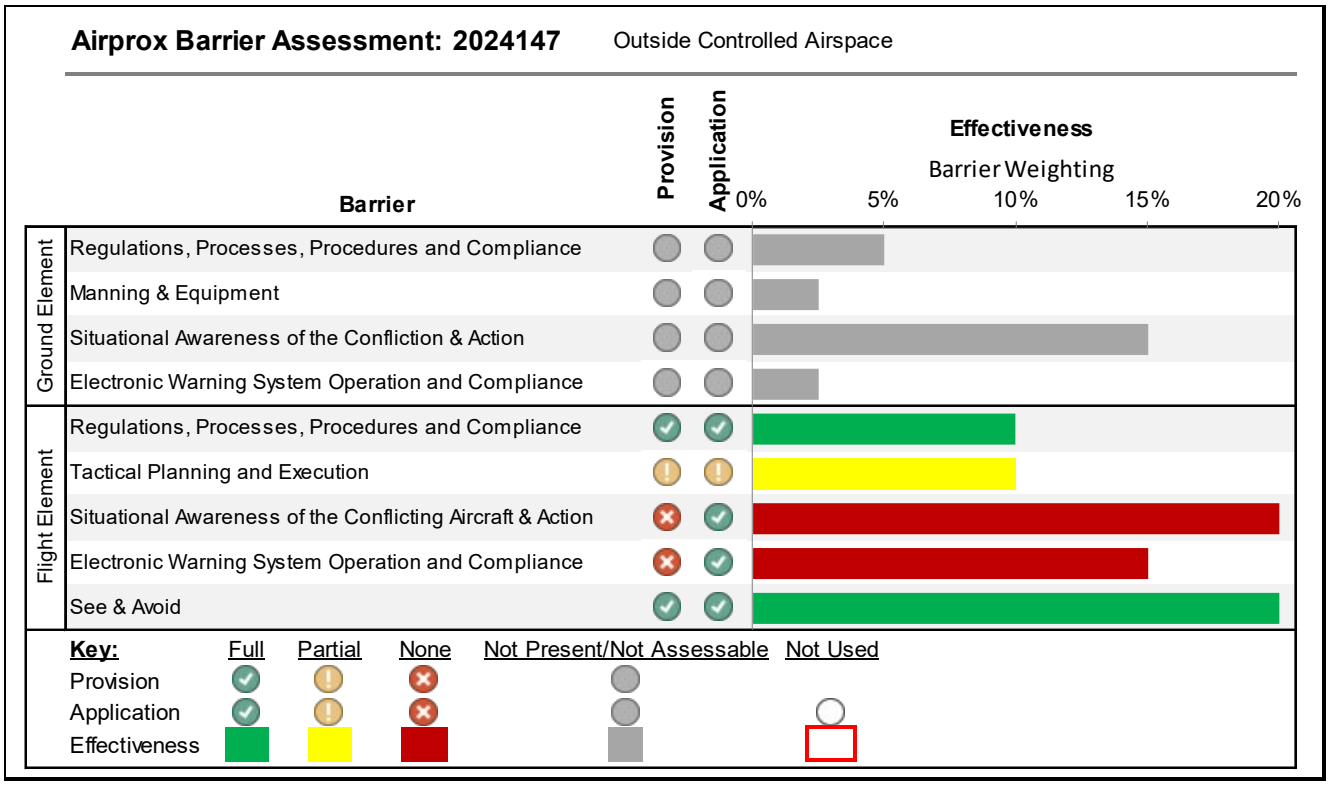
In assessing the effectiveness of the safety barriers associated with this incident, the Board concluded that the key factors had been that:

Flight Elements:

Tactical Planning and Execution was assessed as **partially effective** because, having visually acquired several paragliders at distance, it may have been prudent for the pilot of the A109 to have altered their track to have provided greater separation.

Situational Awareness of the Conflicting Aircraft and Action were assessed as **ineffective** because neither pilot had situational awareness of the presence of the other aircraft until visually acquired.

Electronic Warning System Operation and Compliance were assessed as **ineffective** because the EC equipment fitted to each aircraft would not have been expected to have detected the presence of the other aircraft.



[4] The UK Airprox Board scheme for assessing the Availability, Functionality and Effectiveness of safety barriers can be found on the UKAB Website.