

**Farnborough Airport**  
**Airspace Change Post Implementation Review**  
**CAA Reference ACP-2013-07**  
Annex B Operational Feedback Engagement  
Items 37 and 55

Record of revisions

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## 1 About this document

### 1.1 Introduction

- 1.1.1 This document is part of the Farnborough Airport airspace change post-implementation review (ACP PIR). It should be read in conjunction with the main PIR document which provides the structure, the majority of the evidence, and details the regulatory requirements for the PIR.
- 1.1.2 This document summarises the responses received by Farnborough Airport's request for engagement with local aviation operations on their operational experience of the airspace change.
- 1.1.3 It covers Item 37 (Operational Feedback) and Item 55 (Impact on MoD Operations, specifically RAF Odiham) from the CAA's list of PIR requirements.

## 2 Targeted engagement

### 2.1 With whom did we target this engagement?

- 2.1.1 We targeted the following aviation operations with whom we have a close and regular working relationship.

Stakeholder	Type	PIR Item
Farnborough aircraft operators	Representatives of those flying business jets etc in the airspace	37a
NERL London Terminal Control	National air traffic control unit	37a
Solent Radar (Southampton Airport)	Regional air traffic control unit	37a
RAF Odiham	Adjacent Military air traffic control unit	55a
Blackbushe	General Aviation Aerodrome (powered)	37a
Fairoaks	General Aviation Aerodrome (powered)	37a
Dunsfold	General Aviation Aerodrome (powered)	37a
Lasham Gliding Society	Gliding operations aerodrome	37a
2Excel Engineering at Lasham Aerodrome	Engineering base for airliners; semi-regular operators of large jet aircraft into Lasham	37a
Southdown Gliding Club	Gliding operations aerodrome	37a

Table 1 Targeted local aviation stakeholders

- 2.1.2 Note: All the above stakeholders (except aircraft operators) have Letters of Agreement (LoAs) with us regarding how our operations interface. See the Main PIR Document Section 12 on page 20 for more details.
- 2.1.3 CAA PIR requirement 37b is for feedback from the flight operations sub-committee, a sub-group of the airport consultative committee. The former is generally known as FLOPSC and is common across most UK airports, the latter is known as FACC for Farnborough Airport Consultative Committee.
- 2.1.4 Most airports with scheduled commercial operations have representatives of multiple airlines based locally, responsible for discussing operational and technical matters as part of that FLOPSC.

- 2.1.5 Farnborough Airport's FLOPSC arrangements are different, and are separate from FACC. The nature of Farnborough Airport is that the operators are not generally based here; they are transient or based overseas. This means there are limited numbers of operational staff from an operator consistently available at the airport to join these discussions. This leads to a lower overall take-up of FLOPSC meetings.
- 2.1.6 Since the airport's change of ownership, FLOSPC engagement has been encouraged in order to benefit both airport and operators.
- 2.1.7 The chairperson of FLOPSC has checked meeting minutes either side of the airspace introduction and there were no records referring to the introduction of the airspace, therefore there is no additional feedback we can provide for PIR item 37b.
- 2.1.8 The FACC does have minutes referring to the airspace change, however they are environmental/noise related, not technical flight operations. Relevant extracts from the FACC minutes are presented as an addendum to this document (see Farnborough Airport Consultative Committee (FACC) Minutes Relevant to the ACP, Section 6 from page 21).

### 3 Questions

#### 3.1 What key questions did we ask?

- 3.1.1 We asked three straightforward questions and stakeholders could answer as briefly or as fully as they wished.

##### Question 1

##### **Comparing your operation before and after Farnborough's airspace change, did the transition occur in accordance with your expectations?**

The introduction of Farnborough's airspace was publicised and prepared-for, within the aviation industry. Please summarise how your operation experienced the transition itself, either side of 27<sup>th</sup> February 2020.

##### Question 2

##### **Did your operation experience any unforeseen impacts due to the change, as traffic levels recovered post-pandemic?**

If you had unforeseen impacts as traffic recovered, how were they resolved? Please consider the most recent year 1<sup>st</sup> April 2022-31<sup>st</sup> March 2023.

##### Question 3

##### **Is there any additional feedback, positive and negative, general or technical, that you'd like us to know?**

Please consider the most recent year 1<sup>st</sup> April 2022-31<sup>st</sup> March 2023.

### 4 Results

#### 4.1 Feedback collation and analysis

The following tables summarise and address the main points received.

The raw responses will be sent to the CAA.

## 4.2 Farnborough Aircraft Operators

The transition	Farnborough response
<p>Jet Concierge Club:</p> <ul style="list-style-type: none"> <li>Transition went very smoothly, with no impacts. Deconfliction service has gone for control, but the handover to / from London works really well.</li> <li>5-minute intervals on departures can lead to 20-minute delays at peak times.</li> <li>SID have excessive track miles, routing south to head north / north-west.</li> <li>London Control often hand over to Farnborough at too high an altitude, resulting in expeditious descent pressurising speed control within the STAR.</li> <li>Speed controls within the new SID are too slow, cause early configuration changes burning additional fuel / creating additional noise.</li> </ul>	<ul style="list-style-type: none"> <li>We welcome the positive feedback on the change as a result of the Airspace implementation.</li> <li>3 minutes departure separation on divergent departure routes in place to minimise delay on the ground.</li> <li>SIDS operating as designed during ACP.</li> <li>Working with London control to evolve existing procedures</li> <li>Speed control required for airspace containment and compliance with the SID/STAR design.</li> </ul>
<p>Flexjet: A marked improvement after the transition.</p>	<p>Positive feedback is welcomed</p>
<p>Ineos: No issues.</p>	<p>No response required</p>
Unforeseen impacts	Farnborough response
<p>Jet Concierge Club: Delays and extended sector times to destination.</p>	<p>Airspace design constraints mean extended SID/STAR routings.</p>
<p>Flexjet: None noted</p>	<p>No response required</p>
<p>Ineos: No issues</p>	<p>No response required</p>
Additional feedback	Farnborough response
<p>Jet Concierge Club:</p> <ul style="list-style-type: none"> <li>Departure of RWY06 requires a high rate of climb to achieve 2,500 – 3,000 altitude restriction 4.1nm from the DER. We would set 2000fpm ROC which goes slightly against the operations manual requirements and gives a high rate of climb approaching London airspace.</li> <li>Tower to approach handover very early during departure, when you're busy with after take-off checks and climb profile monitoring.</li> <li>Overly tight radar vectoring was causing glide to be prevalent before localiser if following radar controllers guidance. Crew have had to facilitate their own vectoring within reason to make localiser come before glide.</li> <li>Crew feel a lot happier with the structure and feel much safer now.</li> <li>SIDs / STARs too prescriptive <ul style="list-style-type: none"> <li>Seem to have negated any possibility for radar vectoring within the airspace to the ILS. This adds unnecessary track miles.</li> <li>No longer accept radar to radar from EGKB. A flight that used to take about 15 mins now takes 35 -45 plus mins.</li> <li>Departures all go south before heading north; adds time to northbound routes.</li> <li>Bring back radar vectored abbreviated approaches and departures within the current</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>We welcome pilot feedback on procedures and encourage operator engagement with the FLOPSC.</li> <li>SIDS operating as designed during ACP. High ROC required for controlled airspace containment.</li> <li>Controlled airspace structure requires early frequency transfer to ensure controlled airspace containment.</li> <li>Controlled airspace structure requires confined vectoring to ensure controlled airspace containment.</li> <li>SIDs/STARs operating as designed during ACP to ensure compliance with ACP consultation.</li> <li>SIDs/STARs designed to introduce airspace systemisation, reducing ATC workload and overall noise impact.</li> </ul>

<p>airspace framework.</p> <ul style="list-style-type: none"> <li>• 5-minute intervals for departures add delays in busy periods.</li> <li>• On approach to RWY06 there can be pressure from ATC to descend and slow down quickly because London Control left the handover too late or the aircraft too high. Multiple speed reductions can be difficult when trying to descend. On numerous occasions have intercepted the localiser and glideslope simultaneously quite late in the approach procedure.</li> <li>• Delays due to light aircraft pass the departure end of the runway whilst transitioning the airspace. This could be better managed: light aircraft either fly lower or around the departure end.</li> </ul>	<ul style="list-style-type: none"> <li>• 3 minutes departure separation on divergent departure routes in place to minimise delay on the ground.</li> <li>• Working with London control to evolve existing procedures</li> <li>• Fair and equitable access to all airspace users is essential and means different types of user will mix within the airspace at times.</li> </ul>
<p>Flexjet: When ILS out of service, vectoring to a visual approach within tight airspace dimensions (especially for runway 06) can keep the aircraft energy high.</p>	<p>The ILSs for both runways were upgraded then calibrated, taking it out of service for several periods May to Sept 2022. We expect the vast majority of weekday arrivals to continue to use the ILS, with visual approaches available when appropriate.</p> <p>Specifically, should Runway 06 be in use Kestrel Gliding Club at RAF Odiham has an airspace sharing arrangement. Visual approaches are the norm for Runway 06 when this agreement is activated and this will result in tight vectoring.</p>
<p>Ineos: No issues.</p>	<p>No response required</p>

Table 2 Feedback summary: Farnborough aircraft operators

### 4.3 NERL London Terminal Control

The transition	Farnborough response
<p><b>Pre-implementation</b> Significant resource was used to plan and prepare for the AIRAC including staff training and engineering, this allowed the implementation to be smooth. Additional resources had been prepared to accelerate familiarity with the new airspace, including radar overlays detailing specific points and routes.</p> <p><b>Post-implementation</b> Floorwalkers available to answer any transition queries. Flow measures used to ensure limit initial traffic density. Contingency measures in place, and successfully deployed, should some operators not have updated their FMS databases overnight. Daily review meetings for 2 weeks post-implementation to review any operational issues that occurred. A small number identified and mitigated.</p> <ul style="list-style-type: none"> <li>Majority addressed immediately</li> <li>Some minor system adaptation elements requiring an update as part of the subsequent AIRAC, with additional measures to manage the situation during the interim period</li> </ul>	<ul style="list-style-type: none"> <li>We thank NERL for their support during the controlled airspace implementation.</li> <li>Post transition London Control and Farnborough interface group created (and continues) to meet on a monthly basis to identify trends and resolve any issues. This interface group is focussed on tactical traffic presentation and use of procedures.</li> </ul>
<p><b>Unforeseen impacts</b> COVID-19 meant traffic levels were lower, but ATC were reminded to continue to follow the consulted-on design. Traffic levels then built up at Farnborough and then other LTMA airfields. The operation was able to absorb these changes comfortably.</p>	<p><b>Farnborough response</b> Farnborough acknowledges the way the pandemic impacted air traffic and appreciated how NERL managed its return.</p>
<p><b>Additional feedback</b> NERL is satisfied with how the transition progressed. NERL, Farnborough and Solent Radar facilitate departing traffic. 12-months post-implementation a tri-party workshop discussed the interfaces and identified ways to further refine procedures. This resulted in some minor operational efficiencies being deployed. One area in which NERL has worked closely with Farnborough Airport is with regard to the management of RNAV1 / RNAV5 traffic to Farnborough and adjacent airfields. While STARs exist to accommodate both specifications, prior to transition only RNAV1 traffic was permitted into Farnborough (though wider airfields in the vicinity were expected – and did – utilise the RNAV5 procedures). Post-implementation, a minority of RNAV1 Farnborough crews did not plan for the RNAV1 arrival, which has resulted in some instances of an unexpected lateral trajectory being flown.</p> <ul style="list-style-type: none"> <li>Such instances have been monitored and contributing factors addressed, including further controller awareness communications to ensure correct STARs are being issued.</li> <li>NERL is supportive of any further measures to minimise the risk of the wrong STAR being flight planned or flown.</li> </ul>	<p><b>Farnborough response</b> This was an effective workshop and led to improved LoA procedures  Farnborough continues to work with NERL to ensure crews and controllers are properly briefed on the importance of flight planning the correct STAR. Options being considered regarding evolution of STARs to mitigate RNAV1/5 confusion.</p>

Table 3 Feedback summary: NERL LTC

#### 4.4 Solent Radar via Southampton Airport ATC

The transition	Farnborough response
Transition went as planned. ATCO simulation time and briefings had been completed with good feedback from the team. Extra resource was made available the first week of operation in case of issues, one or two were identified and quickly resolved.	Additional staff and floor walkers in place during transition at Farnborough. Transition went as planned.
Unforeseen impacts	Farnborough response
Solent controls more Farnborough departures than originally predicted. Work is in progress with LTC to alleviate this additional workload.	The LoA was revised to allow Solent to climb traffic earlier in CTA6 rather than the Hanky Box.
Additional feedback	Farnborough response
None	No response required

Table 4 Feedback summary: Solent Radar



#### 4.5 RAF Odiham

The transition	Farnborough response
In line with expectations.	No response required
Unforeseen impacts	Farnborough response
Post-implementation there have been teething issues with regard to ODI IFR traffic gaining access to FBO CAS to conduct instrument circuit training. This has improved through continued communications and development of LOA; however, long holds have resulted in loss of aircrew and controller training.	We work closely with Odiham and a comprehensive review of the LoA was conducted to help with controlled airspace access. TACAN approaches still present an issue as they block the approach/climb out for Farnborough traffic for around 10 minutes. Early coordination to advise when TACAN approaches will take place has helped to reduce this occurrence.
Additional feedback	Farnborough response
Continued development of LOA has identified and offered pragmatic solutions to prevent long holds to ODI Ops. TACAN approaches at FBO continue to present hazards to FBO Ops It should be noted that the current flying levels at ODI remain low due to overseas tasking. Should strategic output change, the number of AS operating from ODI can easily double presenting a higher demand to airspace.	Main holding issue was a delay in giving access to Odiham traffic with perceived priority to Farnborough movements. Initial LoA was rewritten to help simplify the coordination and define the areas of operation within the CTR1. LOA effective 01/08/2021 with follow up meeting on 09/08/2021. A follow up review is in progress to further simplify the coordination, and reduce delays. Controller engagement has taken place to emphasise that Odiham traffic have the same priority as Farnborough traffic. Last LoA review meeting 26/01/2023. TACAN Approaches <ul style="list-style-type: none"> <li>• TACAN approach from outbound to completion takes around 10 minutes. The approach begins at 3,000ft and levels at 2,000ft when established on final approach RWY27. This blocks the climb-outs to RWY24 and final RWY06 whilst in progress.</li> <li>• Odiham endeavour to contact Farnborough in the morning to notify of TACAN activity, and to try and deconflict from busier traffic periods (based on traffic forecast).</li> </ul> Return from Overseas <ul style="list-style-type: none"> <li>• Traffic demand cannot be predicted due to nature of operation at RAF Odiham. Extra demand would initially have to be managed on a tactical basis, working closely with RAF Odiham.</li> </ul>

Table 5 Feedback summary: RAF Odiham

#### 4.6 Blackbushe Aerodrome

The transition	Farnborough response
<p><b>Pre-ACP Implementation</b></p> <ul style="list-style-type: none"> <li>Basic draft LoAs dated 2015, conversations continued with currently Blackbushe management from July 2018 – August 2019.</li> <li>August 2019 – issues with SVFR within Blackbushe local flying area (LFA) raised due to resource and interpretation changes at CAA. Further complicated by trend to remove ORS4 1312 General Exemption E 4919 (exempted VFR operations from the requirements of SERA 5001 and 5005 within Class D).</li> <li>October 2019 – LoA meeting held at Blackbushe to explain draft LoA procedures. Blackbushe based instructor raised safety concern regarding downwind extensions for operations on RWY25.</li> <li>January 2020 – Final LoAs signed. Meeting (and online streaming) held at Blackbushe to present these.</li> <li>Blackbushe AFISOs attended Swanwick / NATS Farnborough simulator training sessions.</li> <li>Communication and collaboration with NATS leading up to implementation was excellent with multiple draft LoAs being presented by Farnborough with Blackbushe’s feedback taken onboard.</li> </ul> <p><b>Post-ACP Implementation</b></p> <ul style="list-style-type: none"> <li>Daily review calls and minor operational issues easily rectified.</li> <li>Blackbushe closed for ~2months from March 2020 due to COVID-19 making it hard to assess the impact of implementation.</li> </ul>	<ul style="list-style-type: none"> <li>Due to Class D airspace VMC rules, during SVFR conditions the traffic at Blackbushe had to comply with Class D rules for the portion (LFA) that sat within CTR1. This was not a restriction required in class G airspace pre-ACP.</li> <li>An ORS4 exemption was issued by the CAA and the LoA and procedures were amended to resolve the SVFR issues.</li> <li>Safety concerns of a possible loss of separation due to proximity to LF arrival/departure aircraft or SVFR/IFR transits when aircraft leave the confines if the LFA due bunching within the Blackbushe ATZ.</li> <li>Procedure review in progress re downwind extensions beyond Blackbushe ATZ.</li> <li>Operational questions resolved tactically by telephone.</li> <li>COVID restrictions prevented face to face meetings.</li> </ul>
<p><b>Unforeseen impacts</b></p>	<p><b>Farnborough response</b></p>
<p>Traffic Levels</p> <ul style="list-style-type: none"> <li>Traffic levels based on 01.02.2019 – 31.01.2020 and 01.04.2022 – 31.03.2023 (not 2020 – 2021 due to COVID impacts). Traffic has grown due to changes in management focus and increased post-pandemic demand.</li> </ul>	<p>Useful information, noted</p>
<p>Lateral Constraints of the Blackbushe ATZ</p> <ul style="list-style-type: none"> <li>Blackbushe had / has a non-standard ATZ design (due to proximity to Farnborough), plus they have Yateley and Eversley noise abatement areas and planning restrictions within their ATZ. Therefore, the circuit at Blackbushe is shorter than some other aerodromes.</li> <li>Lateral constraints have presented issues with increased-go arounds; airspace infringements; and airprox.</li> </ul>	<p>Understand the challenges of circuit operations at Blackbushe, procedure review in progress re downwind extensions beyond Blackbushe ATZ.</p> <p>Airprox report ref 2022-086 dated 22/05/2022 mentions Blackbushe ATZ and was investigated as an MOR. Infringements were also investigated under MOR system and recommendations noted.</p>

Unforeseen impacts (continued)	Farnborough response
<p><b>Go-Around Rate</b></p> <ul style="list-style-type: none"> <li>• Post-implementation, overall movements have increased by 13% but go-arounds have increased by 139%.</li> <li>• Go-around most common on RWY25, where traffic bunching can be common. <ul style="list-style-type: none"> <li>○ Pre-implementation pilots could extend their downwind leg slightly, potentially leaving the ATZ as they turned to base leg and resolve any bunching issue.</li> <li>○ Post-implementation any extension outside the ATZ requires by Blackbushe ATSU and Farnborough. Due to time constraints, this isn't an option, resulting in aircraft continuing a circuit too close to the aircraft ahead and resulting in a go-around.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Procedure review in progress re downwind extensions beyond Blackbushe ATZ.</li> </ul>
<p><b>Airspace Infringements</b></p> <ul style="list-style-type: none"> <li>• Blackbushe are responsible for a large percentage of infringements into the Farnborough CTR-1 mostly due to bunching on RWY25 (see above).</li> <li>• Each infringement would be immediately reported to Blackbushe, feed to Farnborough and used to respond to any CAA request that may occur later. <ul style="list-style-type: none"> <li>○ Responses from Farnborough can take over a week. Often duty ATC informs duty FISO but it is unclear if they are warning a pilot of being close to infringing or actually filing an MOR for an infringed aircraft.</li> <li>○ As result, accurate infringement data is not known. Blackbushe confident it is decreasing as pilots become familiar with the airspace. However, this results in increased airprox and go-arounds.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Procedure review in progress re downwind extensions beyond Blackbushe ATZ.</li> <li>• Infringement in progress - Farnborough ATCO will contact FISO tactically by phone if they are concerned about a potential infringement in attempt to mitigate the risk.</li> <li>• MOR post infringement - If an aircraft has actually infringed, an MOR will be filed post event in accordance with mandatory processes and timescales, this may involve investor phone contact or follow-up emails.</li> </ul>
<p><b>Airprox within Blackbushe ATZ</b></p> <ul style="list-style-type: none"> <li>• Post-implementation airprox have increased to around 2-3 per year.</li> <li>• Airprox report 2022-086 recommends a review of the circuit procedures and capacity limits may be necessary. <ul style="list-style-type: none"> <li>○ Revised rules / procedures since January 2023 have reduced capacity from 4 to 3 aircraft, amongst other changes. Q1 results show lower traffic volumes than Q1 2022.</li> <li>○ Frustration that Farnborough ACP aimed to maximise their movements but resulted in a restriction on activities at other aerodromes.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Useful information, noted</li> <li>• Statement above under 'Go around rate' references traffic growth at Blackbushe of 13%</li> <li>• The airspace change has provided IFR ATS route network traffic to and from Blackbushe with the protection of controlled airspace so in addition has delivered a safety improvement to this traffic.</li> </ul>

Unforeseen impacts (continued)	Farnborough response
<p>Solutions to the Lateral Constraints: Identified by Blackbushe</p> <ul style="list-style-type: none"> <li>Option 1 – to not report infringements based on downwind leg as MOR (assuming aircraft / pilots follow specific parameters). Rejected by CAA Airspace Infringement team.</li> <li>Option 2 – a Farnborough fillet to increase the size of Farnborough out to outside their ATZ to the east. CAA stated this would require a new ACP and public consultation with Camberley as traffic would be forced to now overfly this population.</li> <li>Option 3 – redesign the northern edge of CTR-1 to coincident with the M3. This would bring the Blackbushe ATZ (and other airspace) back to class G. This would create no change in procedures and would return this airspace operation as to pre-implementation. CAA stated this would require a new ACP. Farnborough have no motivation and Blackbushe lack resource and technical knowledge regarding safety assessments. Blackbushe propose the CAA sponsor this, or mandate Farnborough explore this option.</li> </ul> <p>Solutions to the Lateral Constraints: Identified by Blackbushe, Farnborough and the CAA.</p> <ul style="list-style-type: none"> <li>Blackbushe circuit aircraft to wear separate (not 7010) squawk.</li> <li>Blackbushe FISO could request blanket permission for 10 / 15 minutes to extend downwind. These aircraft would not be considered as infringing. Both units would log and monitor such situations. <ul style="list-style-type: none"> <li>NATS Farnborough to write a draft amendment to the LoA. 4 months later, Blackbushe have not yet seen sight of this, although believe it is in NATS internal review.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Procedure review in progress re downwind extensions beyond Blackbushe ATZ.</li> </ul>
<p>Special VFR in the LFA</p> <ul style="list-style-type: none"> <li>SVFR in the area of the transition was not completed in a timely manner and impacted circuit operations. This has been resolved and the number of times it is has been used has been low.</li> <li>Impacted by ORS4 exemption expiring. CAA have since reinstated the ORS4.</li> <li>SVFR remain a necessity in low visibility conditions. These are used relatively infrequently, but this can cause confusion when required.</li> </ul>	<ul style="list-style-type: none"> <li>SVFR issues within the LFA was resolved in the LoA amendment dated 01/11/2021.</li> <li>Ongoing staff refresher training used to help resolve confusion.</li> </ul>
<p>Clearances on the Ground</p> <ul style="list-style-type: none"> <li>Issuing clearances on the ground for aircraft who wish to transit the Farnborough CTR works well and is a positive of the ACP.</li> <li>A limited number of available squawks can result in aircraft having to wait for an available squawk (and therefore clearance) to transit. Blackbushe try to avoid any transit aircraft taxiing without clearance, but additional squawks would be beneficial.</li> </ul>	<ul style="list-style-type: none"> <li>We welcome the positive feedback regarding standard VFR clearances for transit requests</li> <li>Blackbushe is invited to provide further details of these events</li> </ul>
<p>IFR Arrivals into Blackbushe</p> <ul style="list-style-type: none"> <li>IFR traffic now have to follow the Farnborough approach (and departure) routes until instructed to exit by NATS Farnborough. This is a positive for Blackbushe as it allows them to better predict when such traffic will arrive and make sure there is an appropriate gap in other traffic.</li> </ul>	<ul style="list-style-type: none"> <li>We are pleased that this is a benefit of the Airspace change.</li> </ul>

Additional feedback	Farnborough response						
<p>Noise complaints</p> <ul style="list-style-type: none"> <li>Received noise complaints from area south of CTR1 (Farnham and surrounding), their distance from the aerodrome means Blackbushe have little influence over them, and they are outside noise abatement areas. Complaints in this area mostly relate to piston aircraft and aircraft holding, normally waiting for transit clearance from NATS Farnborough. Stakeholders are frustrated as Farnborough do not investigate them as they are not Farnborough traffic. Although a relatively low number of complaints, Blackbushe believes this type of complaint should be considered within the PIR and make sure it does not become a greater problem.</li> </ul>	<ul style="list-style-type: none"> <li>Where provided, complaints of aircraft circling have been investigated by NATS and response reported back to the complainant where appropriate.</li> </ul>						
<p>Squawks</p> <ul style="list-style-type: none"> <li>Requirement for traffic in the circuit to squawk 7010 and when an aircraft fails to do so, and enters Blackbushe LFA, Farnborough ATCOs then call Blackbushe FISO, who contact the pilot. Blackbushe record these (as below) but this may not be accurate as FISOs may forget to complete the report or may group multiple aircraft into one report. Blackbushe have made changes to limit the number of aircraft failing to squawk 7010, but the requirement to do so does place burden on pilots, FISO and ATCOs.</li> </ul> <table border="1" data-bbox="241 699 1265 807"> <tr> <td>01.04.2020 – 31.03.2021</td> <td>127</td> </tr> <tr> <td>01.04.2021 – 31.03.2022</td> <td>70</td> </tr> <tr> <td>01.04.2022 – 31.03.2023</td> <td>113</td> </tr> </table>	01.04.2020 – 31.03.2021	127	01.04.2021 – 31.03.2022	70	01.04.2022 – 31.03.2023	113	<ul style="list-style-type: none"> <li>Farnborough are required to interrogate all aircraft not on a correctly assigned squawk as they activate automated 'Airspace Infringement Warning' tools. This ensures the airspace remains a known environment in which a radar control service can be provided.</li> </ul>
01.04.2020 – 31.03.2021	127						
01.04.2021 – 31.03.2022	70						
01.04.2022 – 31.03.2023	113						
<p>Resource</p> <ul style="list-style-type: none"> <li>Resource requirements have increased by 28% compared to movement increase by 13%. This additional resource is to manage the operation, plus internal investigations into infringements, airprox, other adverse behaviour within the ATZ of which Farnborough airspace is often a contributing factor.</li> </ul>	<ul style="list-style-type: none"> <li>Procedure review in progress re downwind extensions beyond Blackbushe ATZ.</li> </ul>						
Other feedback – not associated with questions	Farnborough response						
<ul style="list-style-type: none"> <li>Blackbushe had previously engaged with EGLF regarding what data would be required for the PIR and told none. However, they were then sent this request, with just over a week to respond which they considered disappointing.</li> <li>Blackbushe can become frustrated with the time required for NATS to effect change or new procedures.</li> <li>This is not the views of all Blackbushe users, schools or other businesses, and Blackbushe trust that Farnborough are also engaging with them.</li> </ul>	<ul style="list-style-type: none"> <li>Questions were intended to be a simple and consistent method of generating feedback from a very diverse group of stakeholders. These stakeholders vary from airspace user to ANSP and therefore specific 'data' was not requested to give flexibility in response. Time pressure was unfortunate due to the limited time between closure of the PIR period and report creation.</li> <li>Given the location of the airspace, there are a high number of stakeholders to engage with. The ACP delivered a significant change for many of these stakeholders and therefore we need to ensure procedures are given time to mature before changes are made. This</li> </ul>						

	<p>is especially important as the impact of Covid on traffic meant many of the procedures are only now being used with high density traffic (Note: TC airspace is yet to return to 2019 traffic levels). Change management requirements mean it takes time to change procedures inside controlled airspace and this is part of ensuring changes are delivered in a safe and assured way. We recognise this is slower than before controlled airspace was in place – this is a reflection of the difference in safety process required when making changes inside a controlled airspace structure.</p>
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Table 6 Feedback summary: Blackbushe

#### 4.7 Fairoaks Aerodrome

The transition	Farnborough response
<ul style="list-style-type: none"> <li>In line with expectations. Minor teething problems; quickly resolved.</li> <li>High level of airspace infringement involving traffic in / out of Fairoaks, particularly negative as briefings had been held prior to implementation.</li> </ul>	<ul style="list-style-type: none"> <li>An airspace crossing intention code of 0467 was introduced with the ACP. This was removed due to expectation bias from pilots leading to infringement risk.</li> <li>Farnborough continue to work with Fairoaks to help reduce infringement risk</li> <li>No Farnborough Controlled airspace to infringe pre implementation except during air show periods.</li> </ul>
Unforeseen impacts	Farnborough response
<ul style="list-style-type: none"> <li>Proximity to COVID-19 lockdown meant post-pandemic pilots were unfamiliar with the airspace, and had skill fade, which contributed to airspace infringements.</li> <li>Impacts resolved by: <ul style="list-style-type: none"> <li>Re-issuing the 27.02.2020 Pilot's Notice.</li> <li>AIP change (AIRAC 06/2023) should clarify to pilots the relationship between Fairoaks ATZ, Fairoaks LFA, London CTR and Farnborough CTA-1, and Farnborough CTR1 and 2.</li> <li>Briefing document about operating in / out of Fairoaks is being produced.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>We thank Fairoaks for their ongoing actions in proactively helping to mitigate against the infringement risk.</li> </ul>
Additional feedback	Farnborough response
<ul style="list-style-type: none"> <li>The introduction of CTA-1 means that departing aircraft can climb to not above 2,000ft AMSL whilst pre-implementation aircraft would be limited to not above 1,400ft AMSL when the Farnborough instrument pattern was active.</li> </ul>	<ul style="list-style-type: none"> <li>We welcome the positive feedback on the change as a result of the Airspace implementation.</li> </ul>

Table 7 Feedback summary: Fairoaks

#### 4.8 Dunsfold Aerodrome

The transition	Farnborough response
<ul style="list-style-type: none"> <li>The transition appeared seamless to those of us involved in Aviation at Dunsfold Airfield. I felt we were adequately informed throughout the process and were not inconvenienced with the subsequent change.</li> <li>One of the main positive outcomes for us was the ability for Farnborough to 'see' London Clearances for us which cut out the need for us to make two phone calls per departure Airways requests.</li> <li>Prior to the Airspace change, we would have to call London TC South and obtain an Airways clearance, subject to Farnborough, as part of our contract. However, London were frequently busy and wouldn't pick up on the telephone number given, causing us to force departure jets (in particular) to hold engines running at the end of the Runway, sometimes for a long period of time, until we could obtain clearances. Often, we would ask Farnborough to do this for us on their direct line when desperate.</li> </ul>	<ul style="list-style-type: none"> <li>We welcome the positive feedback on the change as a result of the Airspace implementation.</li> <li>The reduction in workload as a result of the ACP is a positive change and we are pleased with this feedback.</li> </ul>
Unforeseen impacts	Farnborough response
None	<ul style="list-style-type: none"> <li>No response required</li> </ul>
Additional feedback	Farnborough response
we enjoy an excellent working relationship with the Farnborough Team and often help each other out with transient traffic, emergencies, or general Aviation queries re overhead Traffic, or those in difficulty with WX or Technical faults.	<ul style="list-style-type: none"> <li>We welcome the positive feedback on the relationship and continue to work to support Dunsfold as best we can.</li> </ul>

Table 8 Feedback summary: Dunsfold

#### 4.9 2Excel Engineering at Lasham Airfield

The transition	Farnborough response
<ul style="list-style-type: none"> <li>• Pre-transition engagement from FAL was good; allowing sufficient time for required operating changes and engagement with customers.</li> </ul>	<ul style="list-style-type: none"> <li>• We welcome the positive feedback on the change as a result of the Airspace implementation.</li> </ul>
Unforeseen impacts	Farnborough response
<ul style="list-style-type: none"> <li>• Report found increased workload for small aircraft (ie. King Air and PA-31)                             <ul style="list-style-type: none"> <li>○ Overcome by procedural changes for these aircraft who are now provided with ground support in a similar way to larger aircraft.</li> <li>○ Factors identified included increased GA traffic directly west of Lasham; likely due to new CAS to the east.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• We continue to engage with 2Xcel to help evolve procedures through the LoA</li> </ul>
Additional feedback	Farnborough response
<ul style="list-style-type: none"> <li>• Neutral impact on operational safety.                             <ul style="list-style-type: none"> <li>○ Large aircraft can spend longer inside CAS routing to / from Lasham; reducing risk.</li> <li>○ When transiting to uncontrolled airspace near Lasham the airspace is busier which increase risk.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• We welcome the positive feedback on the change as a result of the Airspace implementation.</li> <li>• Information on volume of traffic outside the Farnborough controlled airspace is analysed and discussed in a separate document (see 'Annex E General Aviation and Glider Study').</li> </ul>

Table 9 Feedback summary: 2Excel Engineering



#### 4.10 Lasham Gliding Society

The transition	Farnborough response
<p><b>Pre-implementation</b></p> <ul style="list-style-type: none"> <li>Lasham undertook changes to reduce risk to aircraft operating out of Lasham as a result of this ACP. This cost ~£500,000 and had no other direct benefits to Lasham or members. These included: <ul style="list-style-type: none"> <li>£100,000 to upgrade avionics on all club aircraft to reduce risk of airspace infringements and upgrades to electronic conspicuity.</li> <li>Private glider flying requirements changed to mandate minimum electronic conspicuity and avionics. This resulted in one syndicate disbanding due to the upgrades being impractical.</li> <li>Series of briefings to club members; briefing materials and new training syllabuses provided; engaged with local GA regarding their transition.</li> </ul> </li> <li>Southern England 1:500 000 charts have poor cartography design which caused confusion at the point of transition and issues remain.</li> </ul> <p><b>Post-implementation</b></p> <ul style="list-style-type: none"> <li>Implementation day went as planned.</li> <li>COVID-19 meant traffic levels dropped significantly, which eased the transition into the new airspace.</li> <li>CAA required Farnborough to provide LoAs with Lasham. These LoAs have not been implemented.</li> </ul>	<p><b>Pre implementation</b></p> <ul style="list-style-type: none"> <li>Farnborough recognises the investment made by Lasham Gliding Society into new technology to facilitate implementation of controlled airspace.</li> </ul> <p><b>Post-implementation</b></p> <ul style="list-style-type: none"> <li>Delays to the LoA have been due to the slower than expected understanding of how the airspace would perform due to Covid reducing traffic levels.</li> <li>Complexity of the procedure to ensure that class D airspace requirements could be adhered to.</li> <li>We are working very closely with Lasham G/S to ensure that an airspace sharing agreement in place as soon as practicable. Given the location of the airspace, there are a high number of stakeholders to engage with. The ACP delivered a significant change for many of these stakeholders and therefore we need to ensure procedures are given time to mature before changes are made. This is especially important as the impact of Covid on traffic meant many of the procedures are only now being used in high traffic levels (Note: TC airspace is yet to return to 2019 traffic levels). Change management requirements mean it takes time to change procedures inside controlled airspace and this is part of ensuring changes are delivered in a safe and assured way. We recognise this is slower than before controlled airspace was in place – this is a reflection of the difference in safety process required when making changes inside a controlled airspace structure.</li> <li>Most recent meeting took place Thursday 26<sup>th</sup> April 2023.</li> </ul>
<p><b>Unforeseen impacts</b></p> <ul style="list-style-type: none"> <li>With traffic recovery in 2020, funnelling of traffic between Southampton CAS and Farnborough CAS was creating safety concerns around Lasham.</li> <li>During the PIR window, three airprox have been reported and fully investigated (Airprox report 2022-052 // 081 // 114), all cited funnelling in this area. Two more within the PIR period are still under investigation; all five have been reported to Farnborough. <ul style="list-style-type: none"> <li>Concern has been present since implementation and rationalises their previously mentioned upgrade / trainings. Have provided ops briefings to Farnborough ATC. Aims to promulgate NOTAMS during intense gliding periods, but CAA opening hours mean these are not always possible.</li> </ul> </li> </ul>	<p><b>Farnborough response</b></p> <ul style="list-style-type: none"> <li>Farnborough submitted the required MOR when notified of an Airprox and continue to work with the UKAB.</li> <li>Farnborough acknowledges the supply of data and, with LGS' permission, has published the analysis as part of the PIR (see 'Annex E General Aviation and Glider Study').</li> </ul>

<ul style="list-style-type: none"> <li>Lasham have collected local air traffic movement data since implementation to compare against post-implementation data. This analysis is currently being completed.</li> </ul>	
<p><b>Additional feedback</b></p>	<p><b>Farnborough response</b></p>
<ul style="list-style-type: none"> <li>On a number of busy days (during the PIR) Farnborough ATC had their frequencies bandboxed, even though they agreed to increase ATC resource as part of this ACP. Bandboxing results in delays and holding, which gliders cannot do, resulting in aircraft having to route to avoid the airspace. This is not an issue with frequencies are not bandboxed.</li> <li>CTA8 and 9 are used by gliders with transponders. Would like discussions about these areas being used by non-transponder aircraft without unduly adding to workload.</li> <li>Lasham believe Southdown Gliding Club and Farnborough have reached some agreements. Lasham do not know what this involves but have not been offered any.</li> <li>Class D airspace has resulted in RAF Odiham having to comply with military rules in this area. This has impacted their ability to accommodate the proposed LoA between Lasham and Farnborough that have no direct impact on RAF operations.</li> </ul>	<ul style="list-style-type: none"> <li>Without reference to individual traffic scenarios it is not possible to explain why or when frequencies were bandboxed or split. As per the ACP agreement, staffing numbers at Farnborough have been increased to facilitate the new controlled airspace requirements.</li> <li>Single frequencies can also experience high traffic loading and workload. Eg when managing an aircraft in distress, which must take priority over all other traffic and delay clearances to enter.</li> <li>We are working closely with all stakeholders to evolve procedures created during the ACP.</li> <li>Class E airspace with TMZ offers flexibility for VFR traffic to enter Farnborough controlled airspace without the need to participate in a service from Farnborough Radar. Any amendments to this would require a full safety and risk assessment.</li> <li>Southdown Gliding club do have an LoA with Farnborough.</li> <li>Farnborough have offered to attend a joint meeting with RAF Odiham and Lasham G/S to discuss their ability to accommodate the proposed LoA.</li> </ul>

Table 10 Feedback summary: Lasham Gliding

#### 4.11 Southdown Gliding Club

The transition	Farnborough response
<p>Pre-implementation</p> <ul style="list-style-type: none"> <li>LoA agreed for access to CTA7 and 8.</li> <li>Transponder equipment fitted to almost all aircraft.</li> <li>Moving-map equipment added to club cross-country gliders to avoid infringements.</li> <li>The 2020 1:500,000 was had poor cartography, but provision of leaflets, charts and publicity by Airspace and Safety Initiative was excellent.</li> </ul> <p>Post-implementation</p> <ul style="list-style-type: none"> <li>Transition was very smooth.</li> <li>Timing (February is quiet for GA) and advance knowledge of change helped.</li> </ul>	<ul style="list-style-type: none"> <li>We welcome the positive feedback on the transition and Airspace implementation.</li> </ul>
Unforeseen impacts	Farnborough response
<p>Majority of leading cross-country pilots (include British Team members) have moved from Parham to Lasham as a result of CTA7.</p> <p>Cross-country kilometres reduced from 64,000km to 32,000km. Thought to be linked to Class D crossing.</p> <p><b>Experience using LoA</b></p> <ul style="list-style-type: none"> <li>Many pilots remain nervous about using the LoA and limit cross-country flying to days they can route round CTA7. Pilots prefer to avoid radio transmissions involved in crossing CTA7.</li> <li>The club promoted using motor-glider to encourage people to continue their cross-country flying. On one occasion they experienced difficulties with to Farnborough workload and this and the cost has discouraged other members from using the motor-glider.</li> <li>CTA8 (Class E and TMZ) has worked well.</li> <li>Issues with using CTA7's LoA: <ul style="list-style-type: none"> <li>Agreed dialogue not followed.</li> <li>Extended hold or standby instruction whilst gliders loose height.</li> <li>Radio frequencies very busy.</li> <li>Called for clearance but ended up not using it.</li> <li>Asked to change to another frequency.</li> <li>Asked to restrict altitude.</li> <li>Asked to hold for &gt;15 minutes (training flight abandoned).</li> <li>Warnings of other traffic not been given, although included in LoA phraseology.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Farnborough are working with SDGC to try and improve the usage of CTA7 and brief controllers on importance of access.</li> <li>Farnborough are working with SDGC to try and improve crossings and brief controllers on importance of access.</li> </ul> <p><b>Experience using LoA</b></p> <ul style="list-style-type: none"> <li>Farnborough welcome the positive comments on the effectiveness of Class E and the TMZ.</li> <li>NATS Farnborough work as closely as possible to help resolve any difficulties.</li> <li>Agreed phraseology and CAP413 phraseology used, but we recognise that CAP413 phraseology is not as familiar to all airspace users.</li> <li>Extended holds sometimes necessary, but controller briefing ongoing to highlight glider requirements and issues of sea air sink.</li> <li>Frequency congestion continuously monitored. Farnborough is a high R/T workload environment, often resulting in frequency congestion.</li> <li>Altitude restriction may still be necessary due to safe integration requirements.</li> <li>Traffic information only passed if pertinent.</li> </ul>

Additional feedback	Farnborough response
<p>No additional comments. These consider the most recent year (01.04.2022 – 21.03.2023)</p> <ul style="list-style-type: none"> <li>• LoA provides a solution to current design but continues to impact Southdown Gliding Club.</li> <li>• Post-implementation, cross-country kilometres have reduced.</li> <li>• Cross-country pilots moved to Lasham.</li> <li>• Remaining cross-country pilots only fly on 'lower risk' days.</li> <li>• Strong preference to avoid radio transmissions.</li> <li>• Crossing CTA7 remains an issue with pilots preferring to avoid CAS.</li> </ul>	<ul style="list-style-type: none"> <li>• Farnborough will continue to work with Southdown Gliding to minimise the impact of controlled airspace wherever possible. We are in dialogue regarding the points raised.</li> </ul>

Table 11 Feedback summary: Southdown Gliding Club

## 5 Conclusion

We are grateful to our stakeholders for these responses and have addressed the feedback in the tables above where possible. Farnborough are committed to aviation safety and are looking to make continuous operational improvements to help increase access and utilisation of Controlled Airspace, this must be done in a balanced way within process of safety assurance in accordance with CAA guidance.

We will continue to work with local airspace stakeholders for the benefit of all airspace users.

## 6 Farnborough Airport Consultative Committee (FACC) Minutes Relevant to the ACP

The following text is extracted from published FACC minutes, search online for [facc.org](http://facc.org) and follow the links to meeting information, or [click here](#) for the FACC meeting archive. We presume that individuals are content with being named here, as their names were published in the original material which is publicly available.

### 6.1 February 2020

#### **Abstract from Minutes; Item 4. Airspace Change Process – Update from Roger Walker**

- 6.1.1 ACP came into effect at 7:00 this morning.
- 6.1.2 Although there has been a significant amount of planning to ensure a smooth trouble-free transition, as one might expect there have been some minor glitches. But generally, all is going well. RW advised that the safety of the airport operation for users and stakeholders alike, is of the utmost consideration when implementing a significant change such as this.
- 6.1.3 RW referred to the request of the Committee at the last meeting, to be available to meet with stakeholders and discuss the ACP process. There was not an opportunity to do this in a timely manner. Implementation was approaching while operating requirements were still in a state of change.
- 6.1.4 It was for this reason FAL decided to create the Airspace Change & Flight Paths at Farnborough Airport FAQ Document and circulate to the Committee. This is now also available to the wider public on the FACC and RBC websites.
- 6.1.5 Jenny Radley- Fleet & Church Crookham Society and Geoff Marks - FARA, were supplied with advance drafts of the FAQ's and had a meeting with FAL to discuss and comment, ahead of its official release.
- 6.1.6 RW announced that WebTrak was available on the FAL website. This facility allows sight of the airspace around Farnborough Airfield movements with a slight delay from the comfort of your own home.
- 6.1.7 RW referred to the October Meeting when he undertook to raise the questions with the CAA and report the response and said these had in part been overtaken by events. For example, it had been thought CAP 725 would be applied but the CAA has now advised it will apply CAP1616.
- 6.1.8 As regards the ACP Post Implementation Review ('PIR'), usually this commences after 12 months. In the case of Farnborough Airport, CAA has indicated it requires an interim report within 6 months with a final one at 12 months.
- 6.1.9 Collection of data required to complete the reports, has already commenced.
- 6.1.10 In addition to this, the CAA has asked FAL to find a way to monitor aircraft activities outside the monitored airspace. This is not a usual requirement. Designing a system to recognise and analyse these movements is underway; FAL is working closely with NATS to do this. RW indicated that this, in itself, moves the rules away from the definition in CAP 1616.
- 6.1.11 That concluded RW's report.
- 6.1.12 Jenny Radley asked if the FAQs were to be put on the RBC website? Additionally, she paid credit to FAL for putting together the FAQs and distributing them to the Committee.
- 6.1.13 RW responded, as yet the FAQs were not on the RBC website but felt that the Airport and FACC sites provided good access for the public.

- 6.1.14 Jenny Radley asked RW if FAL is prepared to offer follow up meetings to local communities in support of the ongoing ACP activity?
- 6.1.15 RW responded positively. He appreciated that local stakeholders would want updates and information as quickly as possible. However, for the preceding reasons and ongoing discussions with the CAA, it would be hard to have a meaningful update before September once the summer holidays were completed.
- 6.1.16 RW indicated he had already been approached by Church Crookham PC to address a meeting and provide an update.
- 6.1.17 The Chairman summarised - saying he felt the FAQs were an excellent idea and they appear to have been well received by the Committee. The additional maps and the introduction of WebTrak were also appreciated.
- 6.1.18 The Secretary had previously circulated to the Committee the following observation from Geoff Marks -FARA
- I consider it necessary to question the CAA's environmental assessment of the airspace change proposal, given its bottom line is that no overall environmental benefit accrues from the projected changes in the use of the Class D airspace.*
- Rushmoor's planning permission addresses noise through LAeq contours, annual movement limits, and its concurrence with noise preferential routes proposed by the operator.*
- The annual movement limits were established by Rushmoor because the LAeq contours will not constrain noise impacts to an acceptable level. The movement limits can be regarded as a 'proxy' for an acceptable noise threshold in the absence of metrics such as SEL, which better represent the noise impacts upon communities.*
- These planning conditions are legally binding on Rushmoor and the operator. Both sides, presumably, are therefore content that the utilisation of the Class D airspace will not lead to the planning conditions being breached.*
- This begs the question as to what useful purpose the CAA environmental assessment serves, as its findings cannot take precedence over the environmental conditions/ tolerability thresholds in the planning permission.*
- The CAA's CAP 1616, at Appendix B paragraph B54, refers to 'primary' and 'secondary' noise metrics. 'Primary' noise metrics are those used to quantify WebTag inputs Secondary noise metrics, such as N65, Lmax, and SEL are said to be important because, unlike LAeq, they convey noise effects.*
- The questions for the CAA arise because its assessment does not take secondary metrics into account, nor does it refer to the Lowest Observed Adverse Effects LEVEL (LOAEL) of 51dB LAeq. If such metrics and contours based on the 50,000 permitted movements were applied in the post implementation review process, the outcomes would aid communications with local communities, and in the longer term form a more satisfactory baseline against which the noise impacts of any future planning application for growth may be predicted and judged.'*
- 6.1.19 The Chairman thanked GM for this and suggested the Committee should be asked if they support sending a letter to the CAA.
- 6.1.20 The Chairman suggested that GM drafts an initial letter, sends this to all members of the Committee for their comments, suggestions and ultimately their approval for it to be sent to the CAA.
- 6.1.21 The Chairman indicated that he feels that approval should be given subject to the terms of the Constitution and would require a 50% majority for adoption before approval is given for it to be sent. This was agreed by the Committee.

- 6.1.22 GM indicated that this needs to be done quickly and he suggested that it should be completed by the end of April.
- 6.1.23 James Radley – Hart District Council, provided his thoughts on the voting mechanism and noted generally that he was disappointed by the poor turnout of Committee members at this meeting. He asked what would happen if we had the same poor response from the proposed circulation of the letter above?
- 6.1.24 GM in response suggested that the Secretary should make it clear when sending the drafts that confirmation of receipt is required and as is their vote for or against sending the letter to the CAA.
- 6.1.25 Action: The Secretary to liaise with the Chairman and GM.

**Abstract from Minutes; Item 7. Members Questions, Questions from Members of the Public**

- 6.1.26 Hugh Sheppard, Hampshire branch of the Campaign to Protect Rural England asked Howard Simmons of ICCAN, do the new flight paths as implemented with ACP push aircraft into other areas? Are these being monitored, and do we know the effects?
- 6.1.27 Howard Simmons responded, this was a very good question but that it was too early to say what the effects would be and until data was collated numbers would not be known. He did offer that if had any useful information on this he would bring it to the next meeting.
- 6.1.28 Reg Milne commented that he found the maps in the FAQs interesting and wondered if it was possible to see both heights and routes?
- 6.1.29 RM also asked if he could have a copy of the information showing the upper and lower levels of altitudes.
- 6.1.30 RW responded stating that in effect Reg was asking for a 3D map and at the moment this is not available.
- 6.1.31 GM referred to the CAA's publication of diagrams of the South East airport controlled airspace curtilages at 2000 feet above sea level and beyond that level in 2000 foot steps. These diagrams are very simple, and therefore a helpful way of illustrating the volume of controlled airspace available for each airport, as well as the extent of the corridors of uncontrolled airspace available for use by the GA community. GM asked whether the diagrams could be updated to include Farnborough's controlled airspace.
- 6.1.32 RW responded that this would not be available.
- 6.1.33 James Radley made the observation that it had indeed been a monumental judgment today (referring to LHR third runway) and this will lead to a change in the way requests by airports for change and or expansion, will be considered by relevant bodies. Environmental changes had not been factored into the FAL approval for expansion. Operators of airports will need to address these issues thoroughly in future planning requests.
- 6.1.34 Abstract from Minutes; Item 7. Members Questions, Questions from Members of the Public
- 6.1.35 Hugh Sheppard, Hampshire branch of the Campaign to Protect Rural England asked Howard Simmons of ICCAN, do the new flight paths as implemented with ACP push aircraft into other areas? Are these being monitored, and do we know the effects?
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- 6.1.37 Reg Milne commented that he found the maps in the FAQs interesting and wondered if it was possible to see both heights and routes?

- 6.1.38 RM also asked if he could have a copy of the information showing the upper and lower levels of altitudes.
- 6.1.39 RW responded stating that in effect Reg was asking for a 3D map and at the moment this is not available.
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- 6.1.41 RW responded that this would not be available.
- 6.1.42 James Radley made the observation that it had indeed been a monumental judgment today (referring to LHR third runway) and this will lead to a change in the way requests by airports for change and or expansion, will be considered by relevant bodies. Environmental changes had not been factored into the FAL approval for expansion. Operators of airports will need to address these issues thoroughly in future planning requests.

### February 2020: Summary of relevant points

- Change had been successfully implemented, but with some minor anomalies.
- FAQ documentation created and shared online (via airport and FACC websites) to stakeholders. WebTrak (via airport website) could allow stakeholders to watch airport movements.
- Confirmation that the PIR process will follow CAP1616, not CAP725 (which the ACP followed). The PIR usually starts 12-months after ACP implementation; in this case, CAA have requested an interim report 6-months and the full report at 12-months. Data collection has already started.
- CAA have requested FAL monitor aircraft outside the monitored airspace; noted that this is unusual and is not part of CAP1616. FAL and NATS are working to find a method to do this.
- Concern regarding the CAA's environmental assessment and how they do not take account of secondary noise metrics and LOAEL, including these in the PIR could be beneficial for communities and future planning applications. Letter to the CAA to be drafted, and submission to the CAA by majority vote.
- Question regarding if the ACP may be pushing aircraft into newly overflown areas; impact not yet known.
- Request for more detailed maps (3D and update to CAA's CAS curtilages map). Both are not available.

### 6.2 October 2020

#### Abstract from Minutes; Item 6. Airspace Change Process – Les Freer.

- 6.2.1 Airspace Change Process (ACP)/ Post Implementation Review (PIR)
- 6.2.2 FAL puts safety at the heart of everything it does, is committed to operating in accordance with our regulatory obligations and for managing our impact on the surrounding community and wider environment.
- 6.2.3 For residents who may not be as familiar with the background to the ACP and PIR, the key headlines are:



- Permission to operate 50,000 movements was granted in March 2011 following the release of the 2009 Master Plan.
  - Following approval; in line with any proposed changes to airspace which could affect the flight paths of aircraft flying at low and intermediate altitudes the airport had an obligation to consult with stakeholders which would include members of the public in areas which may be affected. For information, the CAA regulates all airspace in the UK and is required to consider a framework of legislation, standards and government guidance which then sets out the CAA's obligations and the factors that it must take into account in assessing the merits of the airspace change proposal.
  - The subsequent FAL ACP launched in 2012 and following the initial design process, was publicly consulted on between February and May 2014.
  - The ACP was designed to address a public call for certainty in flight routings of aircraft arriving and departing from FAL and sought to, where possible, concentrate flights paths over less populated areas. Where concentrated, it would seek to retain the highest possible aircraft altitudes when positioning for final approach and achieve a greater altitude during initial climb, thus reducing the number of people significantly effected by aircraft noise.
  - The ACP is regulated by the CAA and FAL has complied with all of the mandatory steps throughout the process, and the ACP was implemented on the 27th Feb 2020.
  - The final stage, PIR, was to look to review the success of the ACP against its original aims.
- 6.2.4 Whilst it had been expected that commencement of the Stage 7 PIR of the Farnborough Airport airspace change would be in the latter part of 2020, the significant impact of the COVID-19 related crisis has reduced the activity levels of Commercial Air Transport and General Aviation.
- 6.2.5 It has therefore been agreed by the CAA, sponsor and the GA stakeholders that the start of the FAL airspace change PIR period will be put back to 2021. As a consequence, the group will meet again in January 2021 to determine the confirmed start date of the PIR, the scope of the required analysis and corresponding data requirements in order to determine the overall impact on all airspace users.
- 6.2.6 Jenny Radley pointed out that FAL had agreed to hold Community Engagement Events for ACP.
- 6.2.7 Would LF confirm he will meet this commitment?
- 6.2.8 LF confirmed this was very much his intention.
- 6.2.9 Geoff Marks light-heartedly apologised for giving Roger Walker a hard time over the years when he represented TAG and now Farnborough Airport Ltd.
- 6.2.10 GM said he would appreciate time with LF in January to understand the metrics of PIR.
- 6.2.11 LF said he would be happy to engage with GM in 2021.
- Abstract from Minutes; Item 8 – Members Questions, Questions from Members of the Public**
- 6.2.12 Question from Brian Edmonds - Wrecclesham & Rowledge:
- 6.2.13 With so much reduced traffic do we know why it is necessary to fly low directly over Farnham?
- 6.2.14 Answered by Ian Dickson – NATS.

- 6.2.15 Farnborough IFR aircraft operating in the Wrecclesham/Rowledge area will generally be inbound descending to 5,000ft on the STAR to shortly receive vectors for the ILS Runway24.
- 6.2.16 Recently we have more Runway 06 operations, which mean the aircraft are taken off the STAR for vectors earlier and descend earlier (this may be down to 3,000ft). During weekend gliding activity at RAF Odiham, limitations on airspace availability causes Farnborough inbound flights to utilise ILS procedures (which stops the gliding) or a visual approach. This visual approach may see aircraft position in closer to the field and at a lower altitude than would be experienced during weekday operations (with no gliding to affect). There is also scope for General Aviation aircraft that overfly Farnborough Controlled Airspace to utilise Farnham Castle as a visual reporting point (this is notified in the AIP) and also a visual hold if needed to wait for a gap in the traffic to facilitate the airspace crossing.
- 6.2.17 More generally aircraft may be removed from the SID/STAR route for reasons of safety (unknown traffic in conflict or weather avoiding) or when deemed necessary for tactical air traffic management reasons. Both Farnborough and London Terminal Control endeavour to keep aircraft on the pre-defined routes for as much of the time as is possible, with each occurrence resulting in an investigation to understand the reasons why.
- 6.2.18 Brian Edmunds asked why when taking off do aircraft fly so low over the countryside?
- 6.2.19 Ian Dickson responded, departures are pre-assigned, if the airspace above is busy aircraft will not be able to climb until the correct levels of separation can be achieved.
- 6.2.20 The Chairman suggested Brian Edmunds visit the Operations Team at FAL.

#### **October 2020: Summary of relevant points**

- CAA, sponsor and GA stakeholders have agreed to move PIR to 2021 due to the impact of COVID-19 on the industry.
- Question regarding low level flights over Farnham. Explained traffic would be descending to 5,000ft for RWY24 STAR or vectored at ~3,000ft for RWY06. During weekend gliding at RAF Odiham, visual approaches are required (ILS approaches stop the gliding activities) which can result in traffic at lower altitudes. GA traffic also use Farnham Castle as a visual reference point and / or hold (notified in the AIP) whilst overflying Farnborough CAS. Additionally, traffic can be removed from the SID / STAR for safety reasons (traffic / weather avoidance).
- Question about low-level departures over the countryside. Explained that departures are pre-assigned and climb cannot be achieved if there is aircraft above the departure.

#### **6.3 February 2021**

##### **Abstract from Minutes; Item 6. Airspace Change Process (ACP) Update – Les Freer.**

- 6.3.1 The FAL ACP became effective on the 27th Feb 2020. Whilst the change proposal was progressed in accordance with CAP 725, the CAA requested sponsors follow the PIR requirements outlined within CAP 1616 so as to ensure that the exercise meets the latest standards. The outputs of the PIR will seek to demonstrate compliance with these requirements on behalf of FAL.
- 6.3.2 The PIR is an assessment of whether the anticipated impacts and benefits in the original ACP proposal and published decision are as expected, and where there are any differences, what steps (if any) the CAA requires to be taken.

- 6.3.3 Due to the high interest from the surrounding GA community and the complexity, the CAA have requested two sets of data from FAL for 6 and 12 months. FAL and NATS aim to submit a test package of data to the CAA after the first month.
- 6.3.4 NATS will provide analysis and documentation detailing the required metric outputs, demonstrating the impact of the change and relating that back to the original claims in the ACP. The analysis produced is based on the requirements in Table H1 of CAP 1616 which covers safety, service and environmental metrics which will be referred to in the PIR. There is also some additional analysis being included relating to Class G VFR traffic patterns in some areas (details can be provided).
- 6.3.5 A meeting was held on Friday 5th Feb 2021 with the CAA, Lasham and Southdown Gliding Societies and Farnborough to discuss the proposed start date of the ACP.
- 6.3.6 Due to the subdued air traffic experienced by each stakeholder, and also the neighbouring London TMA Airports, the decision was made to delay the PIR.
- 6.3.7 Following agreement with the CAA at the above meeting it was agreed to further postpone the start of the FAL PIR until the 1st October 2021. This is solely down to the continual atypical ATM movements caused by the ongoing situation with COVID. The CAA webpage detailing the Farnborough ACP is expected to be amended in the near future.
- 6.3.8 The CAA has confirmed that this is the approach they are taking across all ACP within the UK currently.
- 6.3.9 Some members of the public asked if the acronyms could be explained and made clearer next time.
- 6.3.10 Paul Follows asked if FAL could provide an explanation of Airspace Change Process (ACP) and Post Implementation Review (PIR).
- 6.3.11 Miles Thomas pointed out there are explanatory documents on both the FAL and FACC websites.
- 6.3.12 Action: Les Freer took an action to review the material on the websites to ensure it is clear and up to date

**Abstract from Minutes; Item 8 – Members Questions, Question from Members of the Public**

- 6.3.13 GM felt the 51dB contour would be the best way to identify overflowed areas of population.
- 6.3.14 MT said the 51dB contour had never been used so it would not be an appropriate comparator.
- 6.3.15 MT went on to say, PIR did not require noise contour modelling.
- 6.3.16 GM said he would like to understand this better.
- 6.3.17 MT and LF agreed to take the discussion with GM off-line.
- 6.3.18 Question from Mr C Elithon.
- 6.3.19 What measures will be put in place to monitor noise after ACP/PIR?
- 6.3.20 Miles Thomas responded that the Section 106 details routine noise monitoring requirements to which FAL complies. Additional noise monitoring and modelling did not form a part of the approved ACP process and will not form a part of the associated Post Implementation Review (PIR).
- 6.3.21 Geoff Marks asked how FAL will comply with PIR modelling and whether two monitoring points enough?
- 6.3.22 Miles Thomas answered no noise modelling is required under PIR.

6.3.23 Chris Axam asked if Geoff Mark could suggest what noise modelling he would recommend?

6.3.24 Action: Geoff Marks took an action to provide some thoughts on noise metrics.

#### **February 2021: Summary of relevant points**

- February meeting with CAA, Lasham, Southdown Gliding Societies and FAL agreed to further postpone the PIR to October 2021 due to the impact of COVID-19 on stakeholders' and neighbouring airfields' traffic.
- This delay is in line with other UK ACPs.
- Multiple questions on noise modelling; request to use 51dB contour to identify overflowed populations; what noise modelling would occur after the PIR; and how FAL will comply with modelling required for the PIR. Explained 51dB had not been used previously, so would not be useful for comparison purposes. Furthermore, noise modelling is not required for this PIR and additional noise modelling was not a requirement of the ACP. Thoughts on noise metrics.

#### **6.4 October 2021**

##### **Abstract from Minutes; Item 6. Update on Airspace Change Proposal – Les Freer**

- 6.4.1 All members will be acutely aware that due to COVID-19 and its impacts on air operations around the globe, including in the UK, the CAA suspended the PIR (Post Implementation Review) data collection in August 2020. In Feb 21 a further delay was announced with a commitment to undertake the review in Oct 21.
- 6.4.2 The CAA has reviewed this position once again and it is their view that the ongoing effects of the pandemic on the use of airspace continues to result in a very different use of available airspace. In their view the data collected over the last 18 months, under both CAP765 [sic] & CAP1616 (stage 7 annex H), would not be suitable for the purposes of conducting a proper PIR.
- 6.4.3 As such, the CAA has taken the decision to further delay the re-commencement of PIR data collection until Feb 2022, at which point it will review the situation again. LF appreciates this may be frustrating, but if the CAA used the last 12 months ARR / DEP data this would of course have been very swayed towards the airport due to lower ATM's.
- 6.4.4 Background to ACP PIR
- 6.4.5 Whilst the impact of any particular Airspace Change can usually be simulated and the subsequent outcomes predicated, there may be unpredicted consequences that appear once a change is actually implemented. These consequences could be safety related, operational, technical, or environmental. The PIR would usually commence 12 months after the change has been implemented.
- 6.4.6 PIR's provide a rigorous assessment by the CAA, as the independent regulator, of whether the anticipated impacts and benefits, set out in the original ACP proposal and decision, were delivered, and if not to ascertain why, and to then determine the most appropriate course of action.
- 6.4.7 The PIR is necessary to identify any subsequent requirements that may be required to further modify flight procedures or the airspace structure, the need for which can only be determined after a period of operational experience post ACP implementation.
- 6.4.8 The PIR does not, however, set out to re-run the original decision associated with the Airspace Change.

- 6.4.9 The PIR Process Data and analysis required by FAL to be collected under the original terms of the PIR and will be published on the on-line portal.
- 6.4.10 After this data is published, stakeholders will have 28 days in which to submit any evidence or views on the data that they want the CAA to take into account. FAL will make relevant stakeholders aware (including those who responded to the initial consultation) to direct them to the on-line portal to submit any feedback. No assurances can be given by the CAA for submissions submitted outside of this timeline. We are receiving a lot of questions that are related to this process, in some cases with questions about what else could be included and this is the forum to channel these into.
- 6.4.11 The CAA will aim to publish the results of a PIR within three months of receipt of FAL's data. The outcome of the PIR can lead to two possible outcomes. The CAA may decide to:
- Confirm that the implemented design satisfactory achieves – within acceptable tolerance limits – the objective and terms of the CAA's approval; or
- Require FAL to modify elements to better achieve the objective and terms of the CAA's approval.
- Once the modifications have been implemented and operated for a period (usually 6 months) there are three further possible outcomes:
- Noting that any modifications didn't better achieve the objective, then the CAA may conclude that the original design was satisfactory and thus confirmed.
- Noting that the modification did not better achieve the objective and terms of the CAA' approval, the CAA may conclude that the original design was 'not satisfactory'.
- The CAA may conclude that the modifications do better achieve, within acceptable tolerance limits, the objective and terms of the CAA's original approval, and confirm the design.
- 6.4.12 It is important to remember that FAL's ACP was carried in line with the requirements of CAP725 and is now being reviewed under CAP1616.
- 6.4.13 Questions: Geoff Marks – Thanked Les for an informative explanation, he added that the CAA PIR criteria appeared to be moving towards those he has mentioned i.e. CAP1616. He added that understanding the detail of the inputs/measures/outputs was very important. Residents need to understand how noise will be measured.
- 6.4.14 Jenny Radley – Asked if FAL would undertake to present the ACP and PIR at local community events, as agreed in the past before Covid-19 disrupted the plans? It would especially benefit residents new to the area.
- 6.4.15 Les Freer – Said, PIR requires the Airport to undertake a feedback process with the original local stakeholders and FAL would do that. He made the point, the ACP consultation was not being re-opened.

**Abstract from Minutes; Questions from Members of the Public**

- 6.4.16 Colin Shearn – Commented that the CAA / PIR should look at the knock-on-effect of Airspace Change Proposal (ACP) on general aviation (GA).
- 6.4.17 Joe Barrass – FAL - Responded that GA could do what it wants, FAL has no influence over it.
- 6.4.18 Geoffrey Pierson – A resident in the village of Churt in Surrey explained that the village is being constantly overflown. Why was this, what is happening, when will it stop? Mr Pierson described 15 flights per hour overflying his home.
- 6.4.19 Simon Geere, asked Mr Pierson to contact him with the details.

## October 2021: Summary of relevant points

- PIR process further delayed until February 2022 due to impact of COVID-19 on traffic volumes and reiteration this PIR will be based on CAP1616 not CAP725.
- Questions around stakeholder engagement; namely residents understanding noise metrics and FAL's present at local community events. FAL confirmed the PIR requires them to engage with local stakeholders, but the PIR does not involve re-opening the consultation.
- Suggestion the PIR should look at the impact on GA traffic, FAL explained the GA community were entitled to do so.
- Concern regarding overflights; more details requested by FAL.

## 6.5 February 2022

### Abstract from Minutes; Item 7. Update on Airspace Change – Les Freer

- 6.5.1 FAL received confirmation on the next stages of the ACP PIR from the CAA last Friday (As the CAA had promised to do last Oct) and the CAA have updated their website accordingly. The Airport and FACC websites have been updated this week.
- 6.5.2 Airspace Change Proposal Post-Implementation Reviews (PIRs) impacted by COVID 19 – Update February 2022 (This page was amended on 17/02/2022).
- 6.5.3 A Post Implementation Review is conducted at Stage 7 of the Airspace Change process for CAP 1616 and CAP 725 airspace change proposals. The purpose of the PIR is to enable the CAA to consider whether the anticipated impact and benefits of the change have been delivered. To inform this review, which usually takes place 12 months after the change has been implemented, the change sponsor is required to commence the collection of data on the impacts of the change as soon as the change is implemented and to collect a year of data. The data is used to enable a comparison to be made between pre and post implementation operations. A year of data is required to provide data on all operating conditions which change over the seasons. Indicative PIR data requirements are listed in CAP 1616 and include impact on airspace users, those on the ground and any environmental impacts.
- 6.5.4 Due to COVID-19 pandemic and its impact on air operations around the globe including in the UK, PIR data collection has been suspended since the FAL website update in August 2020. Since that time, FAL has regularly reviewed the position and concluded that the continued impact of the COVID Pandemic on air operations around the globe continues to result in a very different use of airspace than could have been contemplated pre-February 2020.
- 6.5.5 The Airport will update the PIR website page from February 2020. Whilst the effects of the pandemic are subtly different to those six months ago, FAL recognises that its impacts on airspace user continues to be different to that pre-February 2020 and therefore the evaluation of data for the purposes of a PIR may not enable a direct comparison pre and post implementation.
- 6.5.6 The CAA therefore considers that the process for recently approved and future airspace change proposals, PIRs should be subject to a review and the CAA intends to consult on the PIR Process in the CAP 1616 Airspace Change Process review later this year.
- 6.5.7 It is the opinion of the CAA that a sufficient increase in air travel, particularly in the commercial air transport sector is now likely throughout 2020 and therefore, for those delayed and outstanding PIRs we now require sponsors to commence data collection for the purposes of PIRs as follows:

- Any data collected between 1 March 2020 and 28 February 2022 cannot be used as part of a PIR data set. This statement applied to all implemented ACPs due to commence a PIR.
  - Sponsors of ACPs should commence data collection from 27th March 2022. A phased approach to commencement of data collection may be taken by sponsors to take account of resourcing requirements. Therefore, commencement of data may be initiated at any point between 27th March 2022 and 27th September 2022.
  - In all cases the CAA would require that 12 months of data is collected. Should the consultation being conducted by the CAA on the PIR process result in any changes this will be published on the CAA website and articulated to sponsors conducting PIR data collection.
  - Sponsors should advise CAA Airspace Regulation of the date they are commencing data collection. This data should also be published on the sponsors website to ensure their stakeholders remain informed of progress.
  - Additionally, where PIR data collection was commenced before the onset of the pandemic our policy remains amended that:
    - Any PIR data collected by a change sponsor and any analysis by the sponsor which has been completed by 27 February 2020, can be used to as part of a PIR dataset necessary to complete the PIR review in accordance with CAP 1616 or CAP 725 as appropriate.
    - Where an ACP has been implemented and more than 9 months PIR data collection has been achieved up to 27 February 2020, the CAA may decide it has sufficient data to conduct the PIR review. Where a change sponsor considers that they have such data, they should contact the CAA Airspace Regulation team to determine if this data is sufficient for the PIR review to take place.
- 6.5.8 All PIRs of ACPs still following the CAP 725 process will be conducted in accordance with the process requirements for CAP1616. However, when assessing the expected impacts against the actual impacts we will use the methodology applied at the time of the original decision (either UK Air Navigation Guidance 2014 or 2017). Any sponsor with queries regarding the above should contact the CAA at [Airspace.Policy@caa.co.uk](mailto:Airspace.Policy@caa.co.uk)
- 6.5.9 Next Steps
- FAL to notify CAA of intended start date (27th March)
  - FAL will provide a layman's overview of the process, to include;
    - A summary of CAP 1616 (CAA process)
    - Required analytics
    - Timings
    - Stakeholder engagement
    - Proposed comms strategy
- 6.5.10 Action: FAL to supply a layman's overview of the PIR process over the next 12 months.
- 6.5.11 Action: FAL and NATS to supply a summary of the meeting with the CAA.
- 6.5.12 Action: Secretary to circulate CAA document to FACC members.
- 6.5.13 Simon Geere remarked that the Members should read the two sections of the CAA PIR Guidance Document. The web-site links can be found Appendix 4 as attached.
- 6.5.14 Questions: Jules Crossley asked if the scope of PIR would be on the FACC website.
- 6.5.15 Chairman answered if it was not already there, yes it would be on the website.

- 6.5.16 Geoff Marks urged Members to look at the CAA Airspace Change Portal and specifically the CAA Safety & Regulation Airspace Group's environmental assessment of the original TAG Environmental Assessment. He also suggested that the CAA's CAP 1616a and CAP1129 were useful guides to the metrics that the CAA may be expected to use to inform the PIR.

**Abstract from Minutes; Item 8. Members Questions, Questions from Members of the Public**

- 6.5.17 Hugh Sheppard – 'My interpretation of the recent responses to questions about the height of Farnborough incoming or outgoing aircraft above the Surrey AONB amounts to neither NATS nor FAL's ATC taking any responsibility for implementing the preferred height of above 7,000ft as set out in Air Navigation Guidance. Is that correct?
- 6.5.18 Ian Dickson – NATS, responded neither FAL nor Farnborough ATC dictate the routings of arriving / departing aircraft, instead, these were laid out during the SID / STAR designs.
- 6.5.19 Ian did say, he did not know if AONB's were taken into consideration when design ACPs. He will speak with relevant parties within NATS to gain further insight into this.
- 6.5.20 Action: Ian Dickson NATS to review and respond to Question from H Sheppard. Please see attached at Appendix 3.
- 6.5.21 Bob McShee, referring back the question on Surrey AONB asked if any of this was related to Airspace Change.
- 6.5.22 Les Freer answered no, it is not.
- 6.5.23 Mr Shearn remarked with regard to Airspace Change, the increase in commercial and general aviation outside the new flight paths was significant and this should be taken into consideration by the CAA in PIR.
- 6.5.24 Richard Nobbs – Member of the Public, had noted that Ian Dickson had earlier said that he considered the Air Navigation Guidance requiring aircraft to keep an altitude of over 7,000ft when overflying AONB to refer to GA. However, my reading of the guidance was that it refers to airspace routes, which does not narrow it down to GA. Mr Nobbs asked for a fuller explanation in writing of why there is an apparent conflict between the routes currently flown and this guidance.
- 6.5.25 Action: NATS to supply a response to question from Mr Nobbs.

**February 2022: Summary of relevant points**

- CAA have now requested that PIR data gathering should start, as the impact of COVID-19 has lessened. FAL agreed to start end March 2022 for a 1-year data gathering period.
- Question regarding who was responsible for traffic flying low over AONBs and if this is accordance (or not) with the Air Navigation Guidance. Response in Appendix 3 – Ian Dickson. Constraints in the airspace meant there was limited places that SIDs / STARs could be designed within. ACP noted that there would be worsened impacts over AONBs but from RWY06 aircraft would be higher than pre-implementation. Acknowledge that 'where practicable' aircraft should avoid overflying AONBs below 7,000ft but proximity to other airports / AONBs made this impractical.
- Appendix 3 – Geoff Marks  
Question about why date up-to February 2022 could not be used for the PIR and if Gatwick / Heathrow operations impact the use of Farnborough's Cat D airspace. Understanding that in 2021 Farnborough had 26,000 movements, but that could increase to 32,000 in 2022 (based up to the traffic movements in the environmental impact assessment).



- Appendix 3 – Cllr Bob McShee  
Question about what the PIR will start (within the March to September 2022 timeframe allowed by the CAA); what data will be collected and a request for:
  - Comparison of non-FAL GA flights in / around the FAL CAS pre- / post-implementation.
  - Number of noise complaints in 2019 and PIR year.
  - Analysis and picture by altitude and position of RWY24 arrivals through CTA1 and CTR2 post-implementation.
- Appendix 3 – Colin Shearn  
Question regarding when FAL will consult on the scope, timing, process of the PIR and if the CEO will attend a public consultation meeting. Confirmed there will be consultation in this regard.  
Air pollution levels in the vicinity of the airport and how these were above WHO safe levels for PM2.5. Question regarding how much is caused by FAL's operation.  
Some aircraft leaving Farnborough were breaching Class E CAS; question regarding frequency of these safety incidents. Confirmation, this was a result of aircraft not climbing sufficiently and mitigations have been put in place.

## 6.6 June 2022

### Abstract from Minutes; Item 6. Airspace Change – Les Freer

- 6.6.1 Airspace Change – Post Implementation Review (PIR)
- 6.6.2 On 30th March, the FAL and CAA Teams had a call following receipt by FAL of the PIR scope.
- 6.6.3 The change sponsor must provide the CAA with a PIR submission that includes data pre-requested by the CAA. This PIR data request form sets out that list of data required in order for the CAA to complete the PIR assessment. (For clarity the scope was discussed in terms of what the various data forms should look like, it wasn't to agree/disagree with content)
- 6.6.4 Scope was then confirmed by the CAA on the 31st March.
- 6.6.5 FAL contacted all of the FACC members on the 1st April to notify them of the process and a copy of the PIR scope was attached.

This outlined the next steps and outlined how we intended to notify the appropriate stakeholders.

Over the course of the next few weeks FAB contacted all of the original ACP PIR stakeholder and where there had been personnel changes these were identified and any new stakeholders were duly notified.

Stakeholder list included Borough Councils, Unitary Authorities, 88 MPs, 27 Operational Stakeholders: 26 Aviation partners: 27 NATMAC: 40 FAL Stakeholders: 2 Balloon Ops: 12 Environmental Groups, and 18 Airports: 18. A Total: 240 Stakeholders.

Additional Councillors were added following correspondence with Colin Shearn.

An E mail address was set up for stakeholders to send through any questions. Handful of questions sent to date.

The airport is currently gathering the data which will be submitted at the end of March 2023.

- 6.6.6 FAL is aware that some conversations have been had between Geoff Marks and the CAA and the CAA responses have been circulated.
- 6.6.7 CAA have asked FAL to read out the following; *The CAA are cognisant that the extant CAA Farnborough ACP webpage does not provide detail on the information and data required by the CAA from the Sponsor to satisfy completion of the PIR process. In addition, we will clarify exactly which air navigation guidance is applicable to this CAP725 ACP and that the process to be applied for this PIR, for transparency purposes, is in accordance with the information detailed in CAP1616 and CAP1616 Appendix H. This information will be uploaded to the CAA Farnborough Airport ACP webpage in due course.*
- 6.6.8 Having looked at the issues that are being raised there does seem to be a misunderstanding of the PIR process and the applicable noise requirements amongst some stakeholders. Les Freer will look at how FAL can seek to rectify this to provide stakeholders gain a greater understanding of noise and noise policy so that stakeholders are better placed to they are better to respond more effectively to the PIR.
- 6.6.9 For clarity, Les Freer sees this being part of FAL normal business as usual communications activity and not via subgroups.
- 6.6.10 Action: CAA website link to be added to FAL and FACC websites and circulated to Members.
- 6.6.11 Questions.
- 6.6.12 Colin Shearn – Farnborough Noise. The Farnborough Airport Airspace Change has had the effect of moving general aviation (GA) movements that formerly flew in Farnborough controlled airspace into other rural areas not previously over flown. As he understands it currently, the PIR will not include these new rural areas now overflown. Who should he speak to at the CAA to address this issue?
- 6.6.13 James Radley – Asked if it was possible to identify these newly overflown areas?
- 6.6.14 Wally Epton – WJE Associates. Pointed out the PIR can only make an assessment if previous data in these areas had been collected before the airspace change.
- 6.6.15 James Radley – Had heard anecdotally that Farnborough air traffic control (ATC) can be hard/rude to GA flights in its area. Is this true and will this be CAA be able to review the quality of ATC conduct?
- 6.6.16 Les Freer – Responded, NATS are looking at this.
- 6.6.17 James Granger – NATS. Responded, NATS take these comments seriously. Please provide evidence and NATS will look into any cases.
- 6.6.18 Geoff Marks, PIR is to be evaluated under CAP 1616; there is surely going to be a conflict between CAP 1991 and CAP 1616. How do stakeholders influence the CAA to apply the correct evaluation mechanism?
- 6.6.19 Les Freer. There is no conflict. PIR and AMS will run in parallel but these are separate programmes. The AMS will not come to fruition until 2025 to 2027 and any proposed changes would be subject to a separate PIR thereafter.

**Abstract from Minutes; Item 7. Members Questions, Questions from Members of the Public**

- 6.6.20 Colin Shearn. As regards PIR start dates and data collection, stakeholders are confused, they want to lodge their concerns now but are holding back.
- 6.6.21 Les Freer. Over 260 stakeholders have been contacted with details of the process. If any wants clarification, please contact his team who will help.

- 6.6.22 Stakeholders are not required to do anything until next March. In December, FAL will recontact all stakeholders and advise them when and how to submit comments.
- 6.6.23 Colin Shearn. How do stakeholders change the CAA method of review to include displaced GA as mentioned above and it needs to communicate how stakeholder responses will be submitted and recorded.
- 6.6.24 Richard Nobbs – Member of the Public. Is the FACC recommending to the CAA it widens the scope of PIR to include other rural areas impacted?
- 6.6.25 The Chairman suggested, subject to a vote of the Committee which supported this action, that a question be framed and sent to the CAA from the FACC.
- 6.6.26 Action: Draft and send letter to the CAA outlining the issues raised. This will ask the CAA if they would widen the scope of PIR to not previously overflowed areas and if the CAA would attend a meeting of the FACC to discuss PIR ?
- 6.6.27 Geoffrey Pierson. Asked, should the PIR mentioned earlier be used to log concerns/ issues and if so will an acknowledgement be issued?
- 6.6.28 Les Freer. Everything will be logged/stored and sent to the CAA as per the process.
- 6.6.29 The Chairman. Suggested consolidating/storing everything received and submitting it as one, in March.

#### **June 2022: Summary of relevant points**

- Confirmation of PIR start / end date, and scope of data required had been agreed with CAA. Next steps outlined.
- Issue raised to CAA that PIR data request not being available on Farnborough's website and confusion about understanding of noise / noise policies. Additional weblinks agreed to be added to FAL and FACC websites and circulated to members.
- Understanding that the ACP has pushed GA to newly overfly rural areas, but PIR will not include these newly overflowed areas. Although counter comments regarding if it would be possible to identify these areas, and without pre-implementation data there would be no ability to assess the impact.
- Wider stakeholder confusion about when they reply to the PIR. Suggestion that FACC consolidate all members responses and submit as one in March.
- Concern raised again about displaced GA traffic and how to get the CAA to widen the scope of the PIR to include these. Agreed to draft letter to CAA to widen the scope and attend FACC meeting.

#### **6.7 November 2022**

##### **Abstract from Minutes Item 6. Airspace Change – Alex Culley – NATS and Rachel Thomas FAL**

- 6.7.1 Given questions raised through the FACC Alex described that traffic visible to the local area may not all be working through the team at Farnborough. Many of the aircraft operating outside Controlled Airspace choose not to participate in an ATC service and this is not always obvious from data sources readily available.
- 6.7.2 The airspace construct requires tactical intervention to ensure efficient integration of traffic arriving from the north and south, as aircraft may arrive simultaneously. This can result in holding and what can seem to be unexpected vectoring over the local area. The ATC team keep this to a minimum but it is required to maintain a safe and orderly flow of traffic.
- 6.7.3 Questions arising:

- 6.7.4 James Radley – Said, he thought the reason for Airspace Change was to make airspace more predictable. What this has done is push general aviation into lower airspace.
- 6.7.5 Alex Culley – Responded, the real driver to Airspace Change was airspace safety; the impact on a vertical basis has left Farnborough airspace safer.
- 6.7.6 Further questions asked: Are ‘stats’ kept of GA aircraft denied access to Farnborough controlled airspace, this is not always clear. Access is down to negotiation was the response.
- 6.7.7 NATS air traffic controllers are rude/unhelpful.
- 6.7.8 Blackbushe Airport says airspace management has got worse after ACP; Alex Culley said he would meet with Chris Gazzard from Blackbushe to discuss this with him directly.
- 6.7.9 Is WebTrak always accurate? Yes, it is taken directly from the NATS RADAR feed;
- 6.7.10 Marwan Khalek – GAMA Aviation – The safest airspace is controlled airspace. Noise abatement relies on being able to control airspace. It is unfair to label NATS or FAL as difficult to work with, when managing airspace, there needs to be a balance.
- 6.7.11 Geoff Marks -Drew Alex’s attention to the TAG - Consultation Feedback Report Part B and suggested he acquaint himself with the 4 recommendations it made.
- 6.7.12 Following the meeting, Alex Culley did review the recommendation and provided the response attached at Appendix 3

**Abstract from Minutes; Item 9. Members Questions, Questions from Members of the Public**

- 6.7.13 Richard Nobbs – Member of the Public – felt his complaints had not been registered, the complaints process needs to be improved and aircraft noise is an important issue for PIR.
- 6.7.14 Geoff Marks – Kindly offered to forward some information to Mr Nobbs.
- 6.7.15 Action: Gareth Andrews – Will investigate if complaints from Mr Nobbs have been registered.

**November 2022: Summary of relevant points**

- Explained traffic in the local area may not be being controlled by ATC. However, tactical intervention of controlled aircraft may require holding and vectoring over local areas. Demonstration of WebTrak given to help understanding of the situation and confirmation it is accurate as comes directly from NATS Radar feed.
- Clarification that the ACP was about increasing predictability and safety.
- Questioned if data is collected about how many GA aircraft are denied access to Farnborough CAS.
- Concern about airspace management at Blackbushe post-implementation. Alex Culley to discuss this directly with Blackbushe.

## 6.8 February 2023

### **Abstract from Minutes; Item 5. Airspace Change – Post Implementation Review Update. Rachel Thomas – FAL and Pete Rafano – Envirosuite**

- 6.8.1 Please see slide presentation: 1. FACC; PIR & AMS (part 1).
- 6.8.2 Questions arising: James Radley – Asked how much freedom does the airport have to design its own airspace?
- 6.8.3 Rachel Thomas - Responded all airspace changes are governed by the principles laid down by the CAA and the DfT. Working within this, airports do have a degree of flexibility however they also have to work with other airports whose airspace adjoins their own.
- 6.8.4 Davis Munro – Asked about Post Implementation Review (PIR) timing. Rachel went back to the slides.

### **Abstract from Minutes; Item 8. Vexatious Complaints Discussion – Gareth Andrews (Complaints Statistics and Complaints Handling Proposals).**

- 6.8.5 Please see slide presentation: 2. FACC; Airport Complaints (Statistics).
- 6.8.6 As mentioned earlier, Les Freer took up the subject of noise monitoring. FAL was undertaking a review of all previous noise commitments and took an action to summarise these at the next meeting.
- 6.8.7 Action: Les Freer will summarise previous noise commitments and revert with proposed actions plan.
- 6.8.8 There was a lengthy discussion on the subject of noise monitoring.
- 6.8.9 Rachel Thomas – Said work would need to be undertaken to assess any potential noise monitoring sites and then to structure a monitoring programme.
- 6.8.10 Questions arising: Jules Crossley – Asked if all the noise complaints received during PIR would be submitted to the CAA
- 6.8.11 Rachel Thomas – Answered yes it would.
- 6.8.12 Geoff Marks - Asked if FAL would brief him on the latest review of noise metrics.
- 6.8.13 Gareth Andrews – Said he would be happy to assist.
- 6.8.14 Chris Dorn – Commented that looking at the numbers of complaints lodged this must have a distorting effect on any analysis. How expensive was a noise monitor?
- 6.8.15 Pete Rafano – The ones likely used would cost about £10K.
- 6.8.16 James Radley – Explained the ‘Leaky Bucket ‘Algorithm’ which, in his view, explains why the tolerance levels for those who experience no disturbance from a number of flights overhead over a short period of time, but after which every flight can cause annoyance or distress.
- 6.8.17 Jenny Radley -Suggested that residents are likely to be disturbed more by aircraft noise during evenings, weekends and bank holidays when residents are more likely to be at home. There is also a seasonal aspect because they will have windows and doors open in the warmer and sunnier months.
- 6.8.18 Chris Dorn – Agreed and suggested more innovation be applied to the reporting. He also asked if Members could receive details of the complaints in their areas?
- 6.8.19 Simon Geere – Said FAL would look at this again, subject the GDPR restrictions.
- 6.8.20 Les Freer – Said it was important to concentrate on real complaints. The quantities of complaints being submitted made this difficult. Some residents were gaming the system.
- 6.8.21 Some Members felt this statement would annoy residents.

- 6.8.22 Bill Cole - Ash Parish Council and Chris Dorn – Agreed those gaming the system should be sought out to allow genuine complaints to receive the correct level of attention.
- 6.8.23 Gareth Andrews went back to the slides.
- 6.8.24 Please see slide presentation: 3. FACC; Complaints Charter.
- 6.8.25 There was then a discussion on vexatious complaints. Gareth pointed out how the concentration of complaints had moved, had increased dramatically in 2021 and 2022 after airspace change and how three residents were responsible for 66% and the top 10 complainants were responsible for 90% of all complaints.
- 6.8.26 Simon Geere – Said FAL had submitted a proposed change to the complaints section of the S106 last year. He said he regretted doing this without consulting the FACC, so had withdrawn it in November to allow this discussion.
- 6.8.27 Gareth Andrews – Added most local organisations including RBC applied vexatious complaints clauses and read out instructions that can be found on the Farnborough Noise Group website. Please see Appendix 4.
- 6.8.28 Simon Geere – Said FAL would re-submit the application and would appreciate thoughts and comments from Members ahead of this. He asked if Members would please provide their suggestions and comments by 28th February to the FACC Secretary.
- 6.8.29 Jenny Radley – Asked when would FAL submit the planning amendment?
- 6.8.30 Simon Geere – Shortly after that. The usual RBC planning process would then commence.
- 6.8.31 Action: Members to submit comments, suggestions and proposed text for the application to RBC to establish a vexatious complaints exclusion in FAL planning permission, to Simon or the Secretary.

**Abstract from Minutes; Item 11. Matters Raised by the Committee not on the Agenda**

- 6.8.32 Jules Crossley referred back to the Webtrak discussion and asked when the flightpaths/swathes would be updated as mentioned by Rachel Thomas?
- 6.8.33 Rachel Thomas responded that it is hoped that the work currently being undertaken would be in place for the PIR 28-day public feedback period.
- 6.8.34 David Munro – Asked if it would be a good idea to hold a special FACC meeting to discuss PIR.
- 6.8.35 This was put to a vote. Not carried.

**February 2023: Summary of relevant points**

- Confirmation that any noise complaints submitted during the PIR would be submitted to the CAA.
- Question about when WebTrak flightpaths / swathes would be updated. Confirmation this work was currently underway and would be completed prior to the 28-day public feedback period.
- Proposal for a special FACC meeting to discuss the PIR; put to vote and declined.

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