

[REDACTED]

27 March 2018  
EIR Reference: E0003613

Dear [REDACTED]

I am writing in respect of your request of 19 February 2018 for the release of information held by the Civil Aviation Authority (CAA), and I am sorry for the delay in our response. Having considered your request in line with the provisions of the Environmental Information Regulations 2004, we are able to respond to your specific requests below.

1. *“No new CAS is required as a result of this proposal” (FBRA 15-6-12 1.10 indent 1). However, as the basis of the 2014 Consultation Document was that large amounts of CAS was required, there must be a document which minutes when and why this change took place. Otherwise the Consultation would have taken place on an unagreed basis and we assume that this was not the case.*

This statement does not relate to TAG Farnborough’s Airspace Change Proposal. Therefore, as far as we can ascertain, the nature of the document that you are describing does not exist.

2. *Following on from this, there is no reference to the CAS that was subsequently was called “South Coast Airspace” and that was then transferred to NATS to become part of LAMP. Again, there must be a document which minutes when and why this change took place. Otherwise the Consultation would have taken place on an unagreed basis and again, we assume that this is not the case.*

Please find attached two emails of relevance. The first attachment (titled: *URGENT - LAMP Phase1A Module-E - Enabler For LAMP Phase1A*) is an email chain between CAA and NATS. The email seeks confirmation from NATS that the Farnborough Solent Module E is an enabler for the LAMP project. The supporting PowerPoint presentation (also attached) referenced in the email chain identified why there is a requirement for the FL65 CTA area off the south coast to facilitate LAMP 1a programme, in that it helps to deconflict various airfields’ procedures, including Farnborough.

The second email attachment (titled: *LAMP Phase 1A Module E*), is also an email between the CAA and NATS. This email contains a full description of why there was a dependency in the first place, why the transfer occurred when timelines changed, and how this meets the airspace change process.

We have redacted personal data from these emails as, in the CAA’s view, disclosure of such personal information would be unfair. The individuals concerned would not have had

**Civil Aviation Authority**

Aviation House Gatwick Airport South Gatwick RH6 0YR [www.caa.co.uk](http://www.caa.co.uk)

Telephone 01293 768512 [foi.requests@caa.co.uk](mailto:foi.requests@caa.co.uk)

an expectation that their personal data would be disclosed and the CAA can identify no legitimate interest that would be served by disclosing this personal information. Disclosure would therefore be a breach of the first data protection principle and Regulation 13(1) of the EIR provides an exception from the duty to disclose this information. A copy of this exception can be found below.

The lower part of the TAG Farnborough consultation webpage describes the partial transfer and provides a link to the equivalent NATS LAMP website which you may find of interest. The link can be found at: <https://www.consultation.tagfarnborough.com/consultation-documents/>.

3. *“Discussion about the Phase1/Phase2 plan – reminder to be really clear about how this is presented within the consultation material. Agreed that Phase 2 occurring within 5 years of ACP implementation would be appropriate as long as suitable information relating to the decision was made at the time of implementation” (FBN 24-7-13 page 2). Thus the documents refer to Phase 1 and Phase 2 and a requirement to make Phasing clear in the Consultation document, but there is no reference to Phases in the 2014 Consultation document. It would appear that the Consultation has jumped to Phase 2 and so there must be a document which minutes when and why this change took place.*

As far as we can ascertain, the nature of the document that you are describing does not exist. You may wish to contact the change sponsor directly as they may be able to provide an explanation in respect of Phase 1 and Phase 2.

4. *“Changes to vertical distribution of affected tracks will make tracks higher, not lower” (FBRA 15-6-12 1.10 indent 3). However, the airspace design which formed the basis of the 2014 Consultation involved a proposal to lower the airspace, in direct contrast to this agreed outcome of the framework meetings, therefore there must be a document which minutes when and why this change took place.*

This statement does not relate to TAG Farnborough’s Airspace Change Proposal. Therefore, as far as we can ascertain, the nature of the document that you are describing does not exist.

5. *“[Redacted name] stated that the “Quick Win” process would apply to this proposal, and the Stage 5 Regulatory Decision would most likely take 5-8 weeks instead of the normal 16 week” (FBRA 15-6-12 1.10). A “Quick win” proposal was originally proposed with a shortened Consultation period but this did not take place. Therefore there must have been a further change between these Documents and the 2014 Consultation. There must be a document which minutes when and why this change took place.*

This statement does not relate to TAG Farnborough’s Airspace Change Proposal. Therefore, as far as we can ascertain, the nature of the document that you are describing does not exist.

6. *“Due to this proposal, the vast majority of Farnborough Rwy 24 arrivals and Rwy 06 departures would be 600ft higher than today, as they would remain inside CAS (arrivals) or join CAS (departures) at the lowest useable altitude above the extant base, rather than flying at least 100ft below the extant base as per current operations” (FBM 15-6-12 4.6 indent 4). If this proposal had been implemented in the ACP design which formed the basis of the 2014 Consultation, the airspace design proposal would have resulted in aircraft flying 500 ft above the base of the extant CAS. Instead, the ACP airspace design consulted upon under the 2014 Consultation proposed that the new CAS would extend below the extant CAS.*

*Therefore there must be a document which minutes when and why this significant change took place.*

This statement does not relate to TAG Farnborough's Airspace Change Proposal. Therefore, as far as we can ascertain, the nature of the document that you are describing does not exist.

If you are not satisfied with how we have dealt with your request in the first instance you should approach the CAA in writing at:-

Caroline Chalk  
Head of External Information Services  
Civil Aviation Authority  
Aviation House  
Gatwick Airport South  
Gatwick  
RH6 0YR

[caroline.chalk@caa.co.uk](mailto:caroline.chalk@caa.co.uk)

The CAA has a formal internal review process for dealing with appeals or complaints in connection with requests under the Environmental Information Regulations. The key steps in this process are set in the attachment.

Should you remain dissatisfied with the outcome you have a right to appeal against the decision by contacting the Information Commissioner at:-

Information Commissioner's Office  
FOI/EIR Complaints Resolution  
Wycliffe House  
Water Lane  
Wilmslow  
SK9 5AF

<https://ico.org.uk/concerns/>

If you wish to request further information from the CAA, please use the form on the CAA website at <http://publicapps.caa.co.uk/modalapplication.aspx?appid=24>.

Yours sincerely



Mark Stevens  
External Response Manager

**CAA INTERNAL REVIEW & COMPLAINTS PROCEDURE**

- The original case to which the appeal or complaint relates is identified and the case file is made available;
- The appeal or complaint is allocated to an Appeal Manager, the appeal is acknowledged and the details of the Appeal Manager are provided to the applicant;
- The Appeal Manager reviews the case to understand the nature of the appeal or complaint, reviews the actions and decisions taken in connection with the original case and takes account of any new information that may have been received. This will typically require contact with those persons involved in the original case and consultation with the CAA Legal Department;
- The Appeal Manager concludes the review and, after consultation with those involved with the case, and with the CAA Legal Department, agrees on the course of action to be taken;
- The Appeal Manager prepares the necessary response and collates any information to be provided to the applicant;
- The response and any necessary information is sent to the applicant, together with information about further rights of appeal to the Information Commissioners Office, including full contact details.

### **Environmental Information Regulations – Regulations 13**

(1) To the extent that the information requested includes personal data of which the applicant is not the data subject and as respects which either the first or second condition below is satisfied, a public authority shall not disclose the personal data.

(2) The first condition is—

(a) in a case where the information falls within any of paragraphs (a) to (d) of the definition of “data” in section 1(1) of the Data Protection Act 1998, that the disclosure of the information to a member of the public otherwise than under these Regulations would contravene—

(i) any of the data protection principles; or

(ii) section 10 of that Act (right to prevent processing likely to cause damage or distress) and in all the circumstances of the case, the public interest in not disclosing the information outweighs the public interest in disclosing it; and

(b) in any other case, that the disclosure of the information to a member of the public otherwise than under these Regulations would contravene any of the data protection principles if the exemptions in section 33A(1) of the Data Protection Act 1998(1) (which relate to manual data held by public authorities) were disregarded.

(3) The second condition is that by virtue of any provision of Part IV of the Data Protection Act 1998 the information is exempt from section 7(1) of that Act and, in all the circumstances of the case, the public interest in not disclosing the information outweighs the public interest in disclosing it.

(4) In determining whether anything done before 24th October 2007 would contravene any of the data protection principles, the exemptions in Part III of Schedule 8 to the Data Protection Act 1998 shall be disregarded.

(5) For the purposes of this regulation a public authority may respond to a request by neither confirming nor denying whether such information exists and is held by the public authority, whether or not it holds such information, to the extent that—

(a) the giving to a member of the public of the confirmation or denial would contravene any of the data protection principles or section 10 of the Data Protection Act 1998 or would do so if the exemptions in section 33A(1) of that Act were disregarded; or

(b) by virtue of any provision of Part IV of the Data Protection Act 1998, the information is exempt from section 7(1)(a) of that Act.

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 10 June 2015 14:58  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** FW: LAMP Phase1A Module-E

Dear [REDACTED]

I have added some further detail to the rationale sent previously which helps tell the story of why the decisions we took were reasonable. Additions and clarifications are in red:

The reason that Mod E changes were covered in the Farnborough consultation rather than the NATS one is primarily because they are also (and more so) integral to the Farnborough proposal, and that the Farnborough proposal was initially scheduled to go in first. A decision had to be made as to whom ran the consultation on these elements and the fact that Farnborough needed them more, and first, put them in the frame. The fact that they are subsequently seeking to make their changes some time after LAMP Phase 1A was not known at the time – indeed their delay has only really crystallised in the last few months. **It is worth noting that the reason for the delay in the Farnborough proposal is that they have undertaken extensive redesign of the contentious low level elements of their proposal – specifically to address issues raised in consultation. While this delay has resulted in the transfer of the less contentious, higher level parts of the proposal to NATS LAMP, it should be noted that this is because of Farnborough directly responding to objections with a redesign – which I am sure you agree is evidence of a good a consultation process.**

**Specifically, the LAMP1A dependency on the Farnborough proposal was not explicitly stated in the Farnborough consultation for a number of reasons:**

- 1. We/Farnborough were aware that CAA are not minded to approve changes based on a justification that references future changes that are subject to separate and later approval processes as these future changes may or may not come to pass. Farnborough initially intended to progress their changes ahead of, and regardless of whether LAMP1A came subsequently came in. If the consultation was undertaken on the basis that part of the justification was dependent on LAMP1A, we/Farnborough believed there to be a danger that approval of the whole Farnborough proposal may be subject to LAMP1A approval. Farnborough understandably did not want this dependency as at the time they were seeking to implement first and LAMP1A was still on the drawing board.**
- 2. At that stage the LAMP1A design was still relatively immature, and the exact nature of the dependency was not known. At that stage, the LAMP proposal had just finished the swathe consultation, and detailed designs were not in place. Indeed the final design for the higher level Farnborough and Solent routes and their interaction with London City routes over Kent was only finalised after Gatwick had withdrawn (note that this also demonstrates good consultation as the withdrawal was in reaction to consultation response) and the validation simulation, both of which occurred late in 2014.**
- 3. A further reason was around trying to minimise the complexity of what was already two complex consultation exercises. The low level changes to Solent and Farnborough flows that are now in in LAMP 1A Module E are in a geographic area that significantly overlapped the area in which Farnborough was proposing its low level changes. Bear in mind that the London Airspace Consultation was criticised for its complexity, despite our best efforts to simplify. If it also included low level swathes out to Bournemouth and Southampton, covering traffic flows and geographical areas that were also being consulted upon by Farnborough, it would have greatly increased this complexity and the risk to both Farnborough and NATS of challenge to the consultation processes.**

**With the benefit of hindsight it is possible to highlight where the various consultations that the different organisations undertook have a different slant to the final ACP, however the rationale laid out above describes why, at the time, the approach taken was reasonable.**

Furthermore, and more importantly, we are confident that between the NATS or Farnborough consultations:

1. that all the areas affected have been consulted on,
2. that all the potential impacts have been described, and
3. that those with objections have been given a chance to voice them.

As with the question around the Stansted justification (see email of 22/05/2015) we do not believe the omission of a potential benefit (ie the enabler for wider system changes) would have denied anyone the chance to object to the changes presented in Module E, and all the other parts of the consultation have had their own consultation processes during which all relevant stakeholders have likewise been given the chance to object.

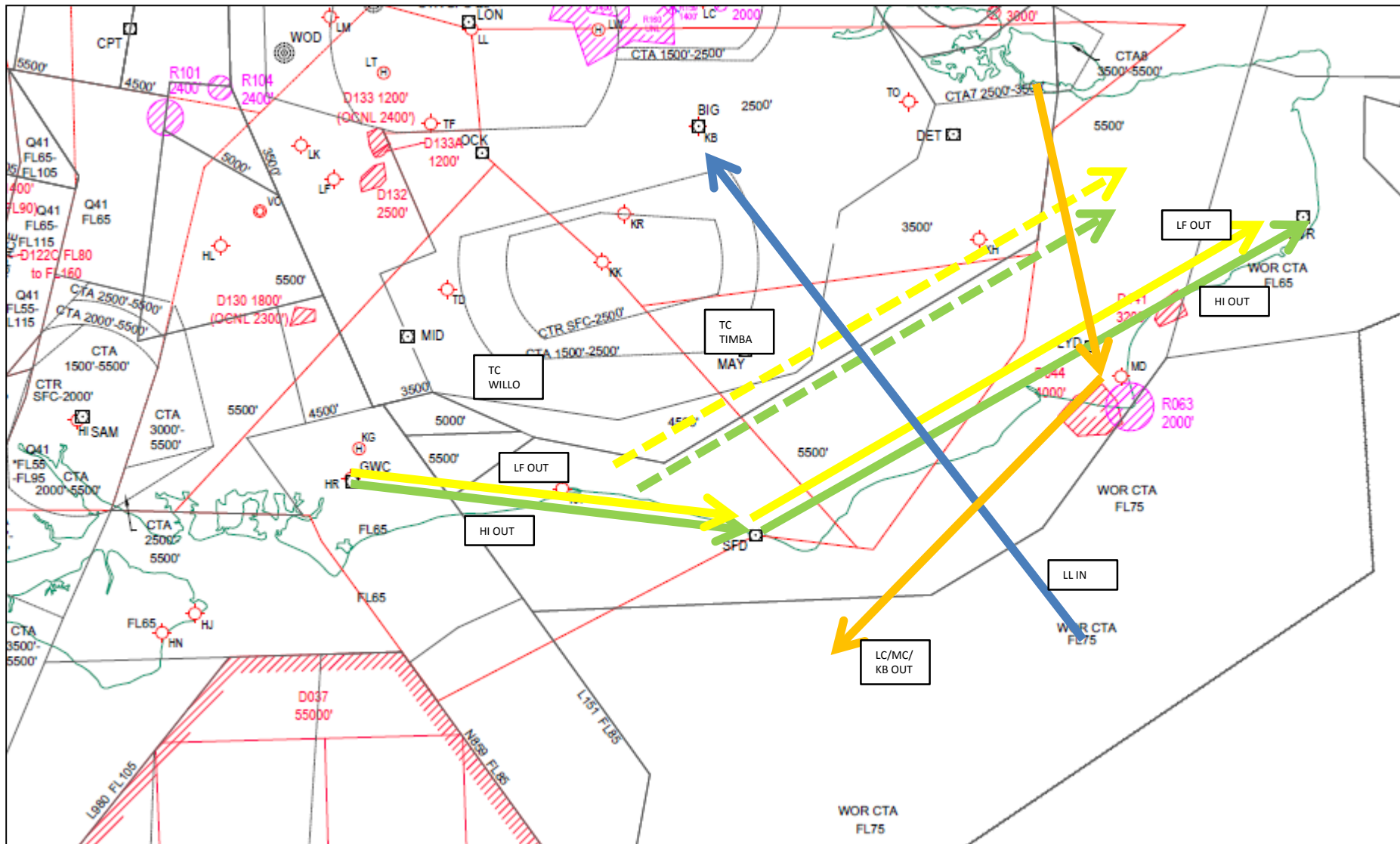
Hopefully this answers your query. If not please let me know.

Best regards,

[Redacted signature]



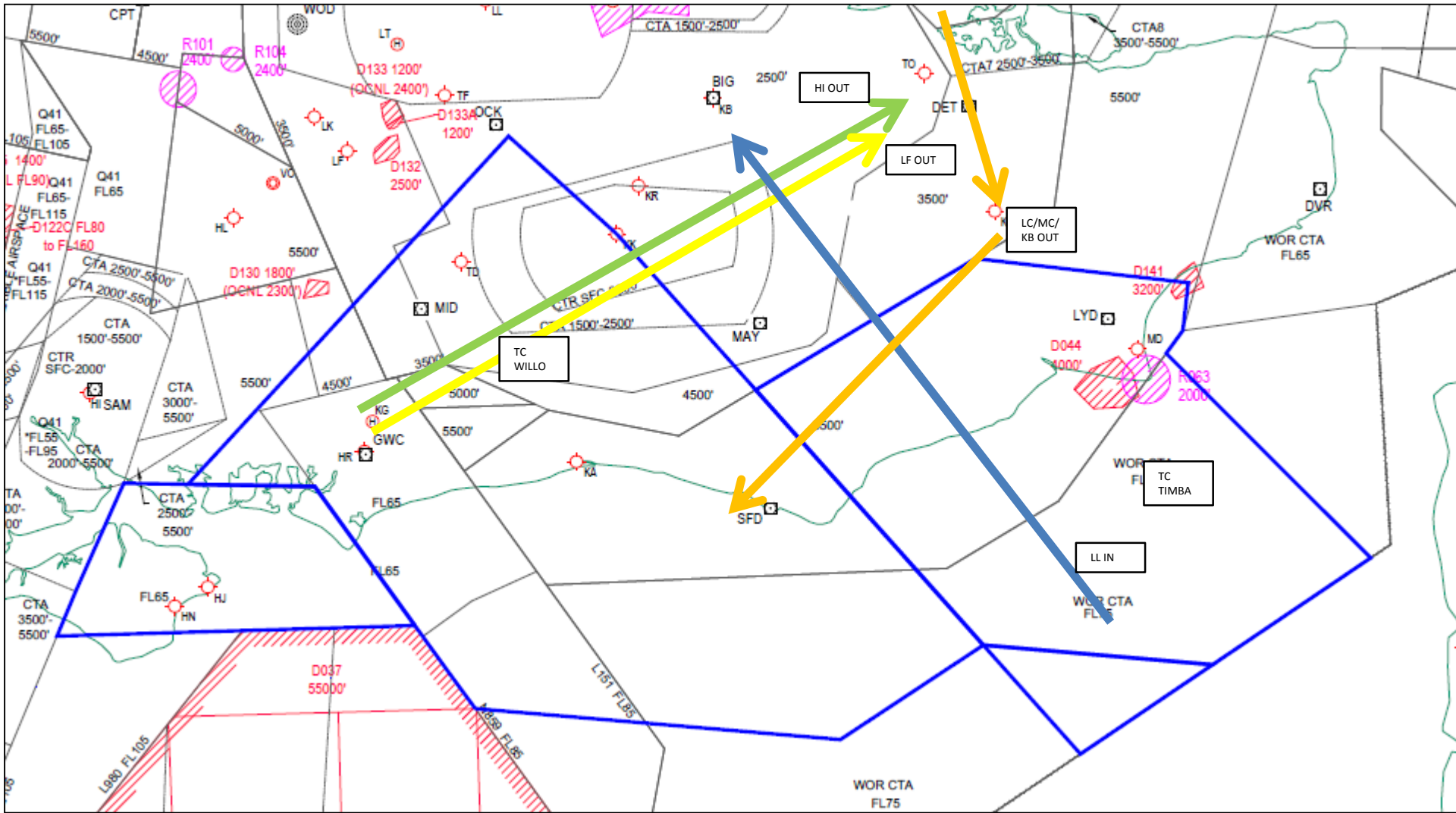
**Today.** TC Sth boundary in Red. LF and HI Deps climb from TC WILLO to S18 9not shown). S18 climb to FL190 and give to S17 (not shown) who then generally jump the LL arrivals by vectoring north of track (dashed green/yellow lines) to get away from the LL arrivals as their profiles are the same where their flight planned routes cross . These LF and HI departures outclimb the LC/MC/KB deps via LYD which have been held down low for miles by Thames. This is currently all S17's job. The LF/HH and HI avoid TC TIMBA.



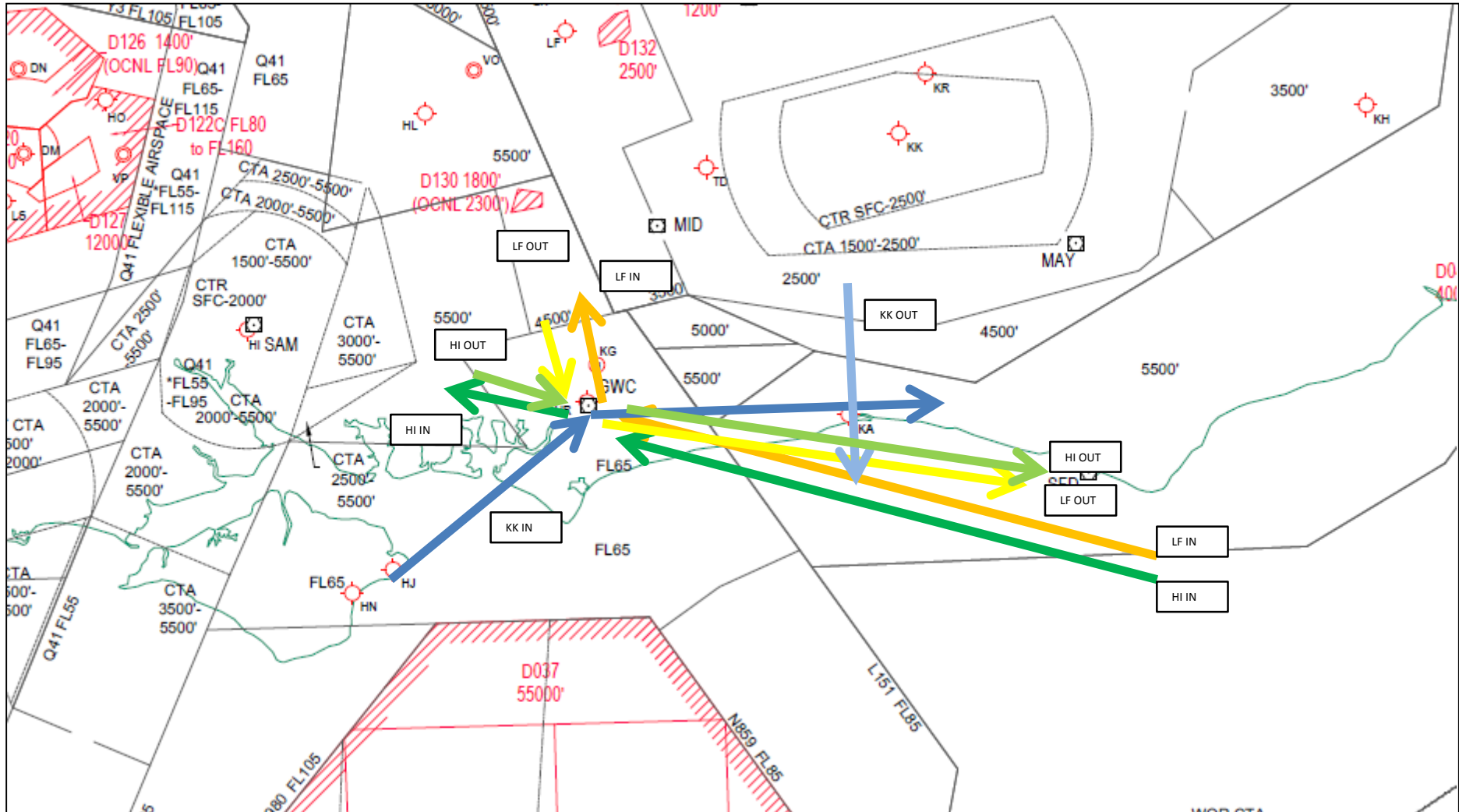


**LAMP 1a.** TC Sth boundary in blue. TC TIMBA much bigger and taking on chunk of S17 task. The new LC design gets LC arrivals higher, quicker allowing TC TIMBA to cut them across ahead of LL arrivals. This would put them head on to LF/HI/HH deps if left via SFD as today: both reaching the SFD/MAY area at the same height.

If we left the LF/HI/HH deps as today they would therefore have to be held down low, underneath LL arrivals and be as low as FL190 as they approach DVR (rather than at cruise). Not only is this restrictive in terms of levels and penalising in terms of fuel and CO2, it would also add complexity to the enlarged TIMBA sector that is disproportionate to the average of c.7 LF/HI/HH flights a day as they would perpendicular to the primary LL arrival flow through the sector, and seeking climb. Note also that c.7 per day is an average number – the complexity would increase on days when there are more flights and/or when they happen to be during times that TC TIMBA is already busy.

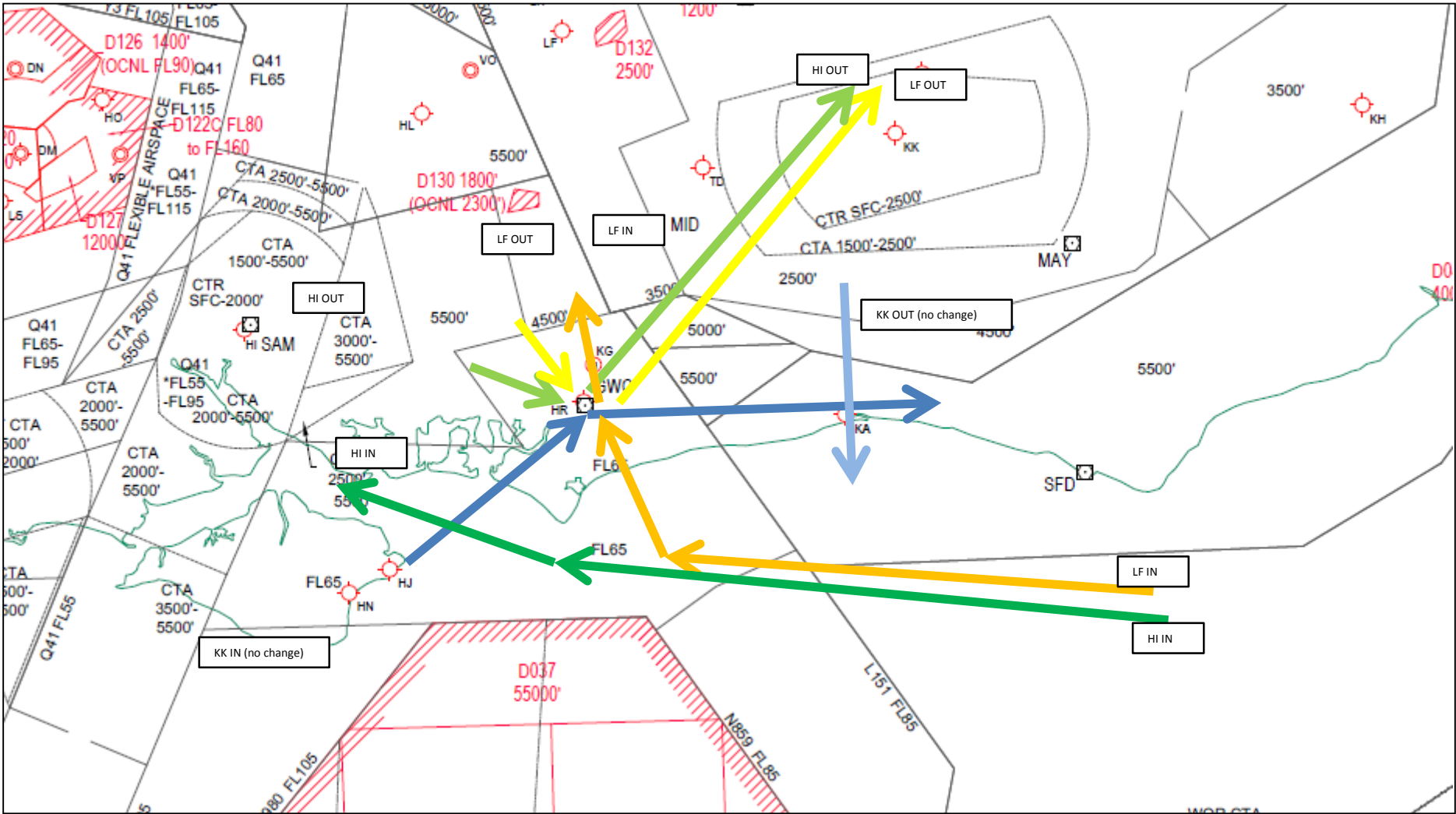


TODAY (ignore FL65 base in IOW area)  
 Everything converges at GWC and SFD



# LAMP1a

Helps to de-conflict all these routes in TC WILLO



[REDACTED]

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**From:** [REDACTED]  
**Sent:** 15 March 2018 13:34  
**To:** [REDACTED]  
**Subject:** FW: URGENT - LAMP Phase1A Module-E - Enabler For LAMP Phase1A  
**Attachments:** Solent and LF change for LAMP1a rationale V2.pptx

**Importance:** High

**Categories:** FOI

[REDACTED]

The attached PP presentation ([REDACTED] will understand) identified why there is a requirement for the FL65 CTA area off the south coast to facilitate LAMP 1a programme, in that it helps to deconflict various airfields' procedures, including Farnborough.

The question raised by [REDACTED] on his 10 Jun 15 email below, seeks confirmation from NATS that the Farnborough Solent Module E is an enabler for the LAMP project. I would have thought that This email thread from [REDACTED] would help to provide the required information

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**From:** [REDACTED]  
**Sent:** 10 June 2015 10:55  
**To:** [REDACTED]  
**Subject:** FW: URGENT - LAMP Phase1A Module-E - Enabler For LAMP Phase1A  
**Importance:** High

[REDACTED]

Further to my request to the SARG Team, re Solent Module E extraction, did you know this was an enabler for LAMP 1A?

[REDACTED]

Airspace Regulator, AAA, SARG  
CAA House, 45-59 Kingsway, London WC2B 6TE

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**From:** [REDACTED]  
**Sent:** 10 June 2015 10:54  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** URGENT - LAMP Phase1A Module-E - Enabler For LAMP Phase1A  
**Importance:** High

For the benefit of ATM Ops inspectors, I have had recent engagement with NATS on the fact that NATS are claiming that the Solent Module E is now an enabler for LAMP1a. This was not evident to me in the Issue 1 of the ACP issued 17 February (not sure what your view was), and has only recently become apparent to me because I have been examining the Module E Issue 2 (updated on 20 March) in detail and completing my report (my last part of the LAMP package). I raised the queries during my compilation of my case study report – the e mail chain from the start will fill you in.

After more persistent questioning from me, I received this yesterday from NATS.

[REDACTED] - from an ATM Ops perspective, if you look at Module 2, you will see relevant updates compared with Module 1. Do you believe this is now a robust argument NATS has presented, now we have these slides?

I therefore need to ask you all, is this now adequate justification to make the Module E stand up as an enabler for LAMP 1A. I really need answers by COP tomorrow.

Thanks,

[REDACTED]  
Airspace Regulator, AAA, SARG  
CAA House, 45-59 Kingsway, London WC2B 6TE  
[REDACTED]

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**From:** [REDACTED]  
**Sent:** 10 June 2015 10:17  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: LAMP Phase1A Module-E

[REDACTED]

Thank you for the slides which goes further in describing the situation. We will be discussing this so I will come back to you with our position on the justification and enabler issue for LAMP 1A as soon as we can.

Regards,

[REDACTED]  
Airspace Regulator, AAA, SARG  
CAA House, 45-59 Kingsway, London WC2B 6TE  
[REDACTED]

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**From:** [REDACTED]  
**Sent:** 09 June 2015 18:04  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: LAMP Phase1A Module-E

[REDACTED]

Here is a bit more detail on the interaction between the Mod E LF/HH/Hi deps, Mod C LC/MC deps and the sectorisation (1<sup>st</sup> two slides) and also a bit on why Mod E is also good for TC WILLO (last 2 slides) which is not a Mod C link but an associated benefit.

Rgds

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**From:** [REDACTED]  
**Sent:** 04 June 2015 09:34  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: LAMP Phase1A Module-E

[REDACTED]

Just to confirm this and seeking a little more clarification – is it due to the numbers of movements to route via (U)N16 away from the other northbound flows into Heathrow and Gatwick (on Module E Issue 2 page 19 you inserted – i.e. from EGLF fewer than 5 flts per day and EHHH and HI fewer than 2 flights a day), the re-routed SAM 2DSTAR, the re-sectorisation, or all 3. I am bound to be asked so a clear understanding would be helpful.

Regarding your other query on the design queries, you should get a reply soon (it was discussed yesterday).

Regards,

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 02 June 2015 10:04  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: LAMP Phase1A Module-E

[REDACTED]

The answer is yes. The Module E Solent and Farnborough traffic to/from the east interact with other flows associated with the Module C LCY changes. Because there are interactions the Module C elements have had to be designed and validated on the basis that the Module E changes are also implemented, so non-approval of Module E would mean that that Module C could not be implemented.

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**From:** [REDACTED]  
**Sent:** 02 June 2015 09:44  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: LAMP Phase1A Module-E

[REDACTED]

Thanks for the prompt reply. Can you just give me an answer to my last question:

Again, for avoidance of doubt, if Module E were to present issues which cannot be resolved before AIS deadlines, does this preclude the LCY network changes being implemented.

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**From:** [REDACTED]  
**Sent:** 01 June 2015 17:04  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** FW: LAMP Phase1A Module-E

[REDACTED]

The answer is yes – there are Module E changes that are now enablers for the wider LCY changes due to the knock on effects and the fact that it is not possible to totally isolate changes in adjacent areas of airspace from one another.

The reason that Mod E changes were covered in the Farnborough consultation rather than the NATS one is primarily because they are also (and more so) integral to the Farnborough proposal, and that the Farnborough proposal was initially scheduled to go in first. A decision had to be made as to whom ran the consultation on these elements and the fact that Farnborough needed them more, and first, put them in the frame. The fact that they are subsequently seeking to make their changes some time after LAMP Phase 1A was not known at the time – indeed their delay has only really crystallised in the last few months.

A further reason was around trying to minimise the complexity of what was already two complex consultation exercises. The low level changes in Module E relate to Solent and Farnborough flows in a geographic area that significantly overlapped the area in which Farnborough was proposing its low level changes. Bear in mind that the

London Airspace Consultation was criticised for its complexity , despite our best efforts to simplify. If it also included low level changes out to Bournemouth and Southampton, covering traffic flows and geographical areas that were also being consulted upon by Farnborough, it would have greatly increased this complexity and the risk to both Farnborough and NATS of challenge to the consultation processes.

While the Farnborough proposal has not progressed as planned, we are confident that all the areas affected have been consulted on, and that those with objections have been given a chance to voice them. As with the question around the Stansted justification (see email of 22/05/2015) we do not believe the omission of a potential benefit (ie the enabler for wider system changes) would have denied anyone the chance to object to the changes presented in Module E, and all the other parts of the consultation have had their own consultation processes during which all relevant stakeholders have likewise been given the chance to object.

Hopefully this answers your query. If not please let me know.

Best regards,

[Redacted signature]



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**From:** [Redacted]  
**Sent:** 01 June 2015 15:54  
**To:** [Redacted]  
**Cc:** [Redacted]  
**Subject:** LAMP Phase1A Module-E  
**Importance:** High

Re-sent due to error!

[Redacted]

Whilst I had quite a few early queries on Module E, I am now writing up my Module E report, and have a few significant queries. I refer to the Issue 2 provided on 20 March which had a number of revisions and new details not present in Issue 1. The statement in Module E Section 1, Introduction sub-paragraph 6 states:

*Note also that as an enabler for the wider LAMP Phase 1A proposal this Module is also justifiable indirectly on the grounds of the operational and overall noise benefits of the wider LAMP Phase 1A proposal.*

Then the new details in Section 6 paragraph 6.1 states that: *This Solent and Farnborough Module is therefore an enabler for the TIMBA STAR changes which is in turn an enabler for the London City point merge system.*

For avoidance of doubt, could you please clarify - Am I right in saying that in addition to Modules A and D being enablers for the LCY network changes, this Module E is equally an enabler for the LCY network change (as described in Module E Section 6.1)?

If so, why was the proposal to lower CAS to facilitate the re-alignment of the SAM2D STAR, the subsequent establishment of (U)N16, the change to the Farnborough departure and arrival routes, and the fact that these proposals enable ATC sectorisation which is an integral part of Phase 1A, not included in the Network Consultation for LAMP Phase 1A rather than being embedded in the TAG consultation?

Again, for avoidance of doubt, if Module E were to present issues which cannot be resolved before AIS deadlines, does this preclude the LCY network changes being implemented.

Grateful for a prompt reply.

Regards,

[Redacted signature]

Airspace Regulator, AAA, SARG  
CAA House, 45-59 Kingsway, London WC2B 6TE

