

AIRSPACE CHANGE PROPOSAL CONSULTATION ASSESSMENT

Title of Airspace Change Proposal	TAG Farnborough (Primary Consultation)
Change Sponsor	TAG Farnborough
SARG Project Leader	██████████
Case Study commencement date	15/07/2015
Case Study report as at	01/12/2017

Instructions
<p>In providing a response for each question, please ensure that the 'Status' column is completed using the following options:</p> <ul style="list-style-type: none">• Yes• No• Partially• N/A <p>To aid the DAP Project Leader's efficient Project Management it may be useful that each question is also highlighted accordingly to illustrate what is resolved (Green), not resolved (Amber) or not compliant (Red) as part of the DAP Project Leader's efficient project management.</p>

1.	Consultation Process	Status
1.1	<p>Is the following information complete and satisfactory?</p> <ul style="list-style-type: none">▪ A copy of the original proposal upon which consultation was conducted.▪ A copy of all correspondence sent by the sponsor to consultees during consultation.▪ A copy of all correspondence received by the sponsor from consultees during consultation.▪ A referenced tabular summary record of consultation actions.▪ Details of and reasons for any changes to the original proposal as a result of the consultation.▪ Details of further consultation conducted on any revised proposal.	Yes
		N/A
		N/A

ASSESSMENT

1. The proposal was initiated by Framework Briefing in June 2012 and was developed over a considerable period. The initial consultation took place between February and May 2014 and resulted in the publication of 2 Feedback Reports (A and B). The sponsor made a number of changes to the proposal consulted upon in order to try and accommodate the requirements of other airspace users. Those changes generally resulted in a reduction in the volume of controlled airspace requested; consequently, no further consultation on the revised proposal was required at that time.
2. The revised proposal was submitted to the CAA in July 2015. The CAA assessment of the formal proposal was suspended in October 2015 due to the immaturity of certain operational arrangements (associated with TC) and the requirement for the sponsor to engage with certain aviation stakeholder groups in order to further mitigate the impact of the proposal on the GA Sports and Recreational Aviation (S&RA)Sector.
2. During simulation in July 2016, an operational issue was identified involving the proposed Farnborough arrivals routes from the south and their interaction with Gatwick departure profiles. That interaction required the repositioning of the Farnborough arrival routes further west. Whilst the revised routes fell just within the swathe previously consulted upon, the CAA considered that the change was sufficiently significant to warrant a further period of consultation focussed on the geographical areas impacted by the amended route design. The CAA initially required a consultation period of 8 weeks; following feedback from stakeholders, the sponsor extended the period to 12 weeks, taking place in autumn 2016. That consultation is subject to a separate assessment
3. Following an offer of assistance, the Future Airspace Strategy VFR Implementation Group (FASVIG) produced a report on the airspace aspects of the proposal from the perspective of Sports & Recreational Aviation (S&RA). The report was aimed at facilitating progress in resolving S&RA concerns over the proposal. Subsequently a number of meetings were held between TAG Farnborough and GA representatives. These meetings, chaired by a member of the CAA independent of the ACP decision-making chain, were aimed at exploring airspace sharing arrangements to mitigate the impact of the proposal GA (specifically gliding) activity. These meetings failed to resolve any issues as GA stakeholders were reluctant to discuss FUA and access agreements, instead wishing to concentrate on an alternative proposal. It is noted that the GA representatives were adamant that the CAA had requested them to provide an alternative proposal whereas the CAA did not consider that to be the case. A separate review of the GA 'Alternative Proposal has been undertaken to consider whether there are any characteristics that could usefully be considered.
4. The consultation undertaken from 3 February to 12 May 2014 was comprehensive and well-publicised. It generated a large number of responses from both aviation and environmental stakeholders. **In total, 13177 comments from 2669 stakeholders were submitted. These responses have been submitted by the sponsor in their original form; all have been read since the submission of the proposal in July 2015.**

	<p>5. Given the large amount of feedback to the consultation, the sponsor elected to produce an initial feedback document, <i>Airspace Consultation Feedback Report Part A</i>, detailing the level of response and the issues that had been raised. Subsequently, the sponsor published a further report, <i>Airspace Consultation Feedback Report Part B</i>, detailing TAG Farnborough's response to the issues raised.</p> <p>6. The consultation was primarily hosted via a website. The CAA was notified by the sponsor that a technical fault between 11th and 16 April 2014 had resulted in the loss of a number of consultation responses. To mitigate this issue, the consultation was extended by 9 days and TAG Farnborough undertook publicity to highlight the issue in order to encourage those whose responses were lost (believed to be 114) to resubmit. The course of action was considered appropriate by the CAA in the circumstances.</p> <p>7. The following general issues were identified by the sponsor:</p> <ul style="list-style-type: none">• Access to the proposed airspace (Aviation stakeholders)• Justification for the proposed change (Aviation and environmental stakeholders)• Safety issues associated with funneling/compression around/below the proposed airspace (Aviation and environmental stakeholders) <p>8. Analysis of the raw consultation submissions supports the sponsor's assessment of the issues raised.</p> <p>9. The second feedback document, <i>Airspace Consultation Feedback Report Part B</i>, constituted a rigorous analysis of the consultation responses and highlighted a number of steps that the sponsor was taking to address the issues raised during the consultation. These included:</p> <ul style="list-style-type: none">• Redesign of departure routes• Reduction in the volume of airspace originally requested (-32%)• Redesign of 1 arrival route <p>10. The proportion of the TAG Farnborough proposal referring to airspace over the Isle of Wight/Solent area was transferred to the sponsorship of NATS as part of the LAMP 1A development in Winter 2014. This was due to the extending timelines associated with the Farnborough change and the need to implement the change to support the LAMP 1A programme. The transfer was endorsed by the CAA at that time.</p> <p>11. Whilst a number of process objections were registered, the CAA concluded that they did not invalidate the conduct of the consultation.</p>
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	<p>12. Overall, the consultation provided sufficient information for stakeholders to offer a response, and there was adequate time during which stakeholders had the opportunity to respond. The consultation response document produced by the sponsor indicated that there had been conscientious consideration of the issues raised and the subsequent modification of the proposal in respect of access issues indicated that the outcome of the consultation was not predisposed. Consequently, it is concluded that the consultation met the Gunning Principles of consultation and the CAA's regulatory requirements.</p>	
1.2	<p>Were reasonable steps taken to ensure all necessary consultees actually received the information e.g. postal/e-mail/meeting fora?</p> <p>The consultation was well-publicised by the sponsor utilising press and news releases. In addition, the proposal was broadly publicised in aviation sector publications. The sponsor was conspicuous in attending a large number of public meetings and proactively seeking out engagement opportunities.</p>	YES
1.3	<p>What % of all operational consultees replied? (Include actual numbers).</p> <p>The sponsor identified 81 primary aviation stakeholders, of which 29 responded. This is a relatively high response rate, but understandable given the publicity that the consultation received. It is noted that a large number of GA pilots responded as individuals to the consultation</p>	36% (29)
1.4	<p>What % of all environmental consultees replied? (Include actual numbers).</p> <p>The sponsor identified 97 primary stakeholders, of which 22 responded. This is a moderate response at face value, but it should be noted that the figures include contact with 47 Parliamentary Constituencies (MPs), of which only 3 responded to the consultation. Removing the constituencies from the calculation leaves 50 primary stakeholders eliciting 19 responses corresponding to a 38% response rate.</p>	23% (22)
1.5	<p>Were reasonable steps taken to ensure as much substantive feedback was obtained from the consultees e.g. through follow-up letters/phone calls?</p> <p>Whilst the sponsor undertook hastening action, the publicity surrounding the consultation and the proactive stance of both the sponsor and those organisations objecting to the proposal, resulted in a relatively high response rate.</p>	YES

1.6	Have all objections to the change proposal been resolved (or sufficiently mitigated)?	YES
	<p>A number of GA stakeholders have maintained that the proposal, in any form, is unacceptable. Whilst that view is recognised and understood, the conduct of the sponsor has been to engage where possible, even where stakeholders have to some extent appeared to resist that engagement. The response by the sponsor, following consultation, was to reduce the proposal to mitigate those demands whilst TAG Farnborough considered that it satisfied the aims of the proposal. The primary issues raised during the consultation are as follows:</p> <ul style="list-style-type: none"> • Access to the proposed airspace (Aviation stakeholders) <p>The sponsor redesigned the proposal to reduce the impact on other airspace user. Subsequently, the sponsor entered into further dialogue with those affected.</p> <ul style="list-style-type: none"> • Justification for the proposed change (Aviation and environmental stakeholders) <p>The justification for the proposal was challenged by both aviation and environmental stakeholders alike, the argument being that firstly, Farnborough could continue to operate without the additional airspace, and that the type of operation undertaken at the airport did not justify the inconvenience to other airspace users. The sponsor maintained that the proposal would provide benefits in terms of efficiency and that the proposal had been reduced significantly since the original proposal had been consulted upon in order to reduce its impact on others.</p> <ul style="list-style-type: none"> • Safety issues associated with funneling/compression around/below the proposed airspace (Aviation and environmental stakeholders) <p>The sponsor redesigned the proposal to reduce the impact on other airspace user. Subsequently, the sponsor entered into further dialogue with those affected.</p> <ul style="list-style-type: none"> • Environmental Issues (noise) <p>A number of environmental stakeholders inferred that because controlled airspace was being established beneath existing controlled airspace, the consequence would be that Farnborough arrivals/departures would be lower as a consequence. The view was prevalent during the initial consultation and was promoted by some constituents of the General Aviation community. The sponsor remained adamant that the airspace required would contain existing operations that had previously had to operate in Class G airspace. Consequently, Farnborough aircraft would be at similar levels or higher in some cases due the predictability of routes that would not be subject to radar vectoring to avoid unknown aircraft operating in Class G airspace.</p>	

	<p>Further concerns were raised over Farnborough's aspiration to reach 50000 air traffic movements per annum although this was outside the scope of the consultation, with the sponsor freely accepting that the cap could be reached without the additional airspace. The sponsor maintained that the change would provide efficiency improvements to its operation.</p> <ul style="list-style-type: none"> • Airspace Change is a potentially complex issue and it is the responsibility of the sponsor to balance that complexity with the need for accessibility and understanding. In this case, the consultation document was reviewed by the CAA prior to the consultation launch and it was concluded that the right balance had been struck. In terms of publicity, the sponsor is required to publicise the consultation in a proportional manner in order to provide potential stakeholders. In this case, there was a great deal of press coverage of the proposal and consultation evidenced by the large response that the sponsor received.
	<p>Process Issues. Airspace Change is often a complex issue and it is the responsibility of the sponsor to balance that complexity with the need for accessibility and understanding. In this case, the consultation document was seen by the CAA prior to the consultation launch and it concluded that the right balance had been struck. In terms of publicity, the sponsor is required to publicise the consultation in a proportional manner in order to provide potential stakeholders with the information and seek feedback in accordance with the Governments Consultation Principals. In this case, there was a great deal of press coverage of the proposal and consultation evidenced by the large response that the sponsor received. Whilst there was a technical problem with the consultation website between 11 and 16 April 2014, the response of the sponsor was proportionate and did not compromise the overall consultation activity.</p>

Outstanding Issues		
Serial	Issue	Action Required
	N/A	

Additional Compliance Requirements (to be satisfied by Change Sponsor)	
Serial	Requirement
	N/A

Recommendations	Yes/No
Does the Consultation Report and associated material meet SARG requirements?	YES
The Consultation Report and associated material meets SARG regulatory requirements.	

General Summary

The sponsor undertook a comprehensive consultation exercise and demonstrated a willingness to engage, despite the reticence of some stakeholders. The conduct of the consultation accorded with the Gunning Principles and the Government Consultation Principles (2016). There is clear evidence that the issues raised by stakeholders were given conscientious consideration by the sponsor, and further development was undertaken confirming that the outcome of the consultation was not predisposed. Given the publicity surrounding the proposal and the extension to the consultation period following the technical problems encountered by the sponsor, I conclude that an adequate period was provided for stakeholders to consider a response to the consultation and, having reviewed the consultation material, I also conclude that sufficient information was provided to consultees to enable them to provide a response.

Comments

This was a controversial proposal but this must be separated from the consultation activity that took place and which met regulatory requirements.

Observations

N/A

Consultation Assessment Sign-off/Approvals

	Name	Signature	Date
Consultation Assessment completed by (Airspace Regulator (Coordination))	[REDACTED]	[REDACTED]	01/12/2017
Consultation Assessment approved by [REDACTED]	[REDACTED]	[REDACTED]	12/01/2018

SARG Comment/Approval

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