

AIRSPACE CHANGE PROPOSAL CONSULTATION ASSESSMENT

Title of Airspace Change Proposal	TAG Farnborough – Addendum Consultation
Change Sponsor	TAG Farnborough
SARG Project Leader	██████████
Case Study commencement date	15/04/2017
Case Study report as at	30/11/2017

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. 	<p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes</p> <p>N/A</p> <p>N/A</p>

EXECUTIVE SUMMARY

1. The original TAG Farnborough proposal was submitted in July 2015. However, during simulation in the summer of 2016, a safety issue was identified concerning the interaction of the proposed Farnborough arrival procedures from the south and Gatwick Airport departures. The resolution to this issue required the redesign of the Farnborough arrival procedures to route further to the west of their original position. The CAA considered that, whilst the redesigned route remained just inside the geographical area encompassed by the original 2014 consultation, the change in routing was significant enough to warrant further local consultation. To that end, it was agreed that TAG Farnborough would undertake a further addendum consultation focussed on those areas that could, potentially, be impacted by the change. The addendum consultation took place from 10 August to 2 November 2016; whilst it was initially agreed with the CAA that the addendum consultation would last for 8 weeks, the sponsor voluntarily extended the consultation period to 12 weeks at the request of environmental stakeholders.

2. The addendum consultation focussed on those Parish Councils potentially impacted by the change, but was advertised by the sponsor in order that other parties could respond. **The consultation generated 2867 comments from over 600 stakeholders. These comments have been submitted to the CAA in their original form and have been individually read.**

The key themes raised during the addendum consultation were:

- Environmental impact (aircraft noise).
- Access to the proposed airspace.
- Safety
- Justification for the proposed change.

3. These themes were correctly identified by the sponsor and articulated in the *Farnborough Airport Airspace Consultation Feedback Report C* published on 14 December 2016. The themes generally mirrored the themes raised during the original consultation undertaken from 3 February to 12 May 2014. Whilst the sponsor responded to the majority of the issues raised in a manner similar to its response in the original consultation feedback, the proposal was modified to try and mitigate access issues raised by the General Aviation community resulting in a reduction of the portion of the proposed airspace known as 'CTA-7'. The response to other issues presented a rational argument as to why those issues could not be further addressed.

4. 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.

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 sponsor contacted 24 Parish Councils directly as well as local and national aviation stakeholders (including NATMAC). Public meetings were held in Midhurst on 1st and 20th September 2016. The addendum consultation took place from 10 August to 2 November 2016; whilst it was initially agreed with the CAA that the addendum consultation would last for 8 weeks, the sponsor voluntarily extended the consultation period to 12 weeks at the request of environmental stakeholders. In addition, there was widespread press coverage of the addendum consultation.</p>	YES
1.3	<p>What % of all operational consultees replied? (Include actual numbers).</p> <p>The sponsor identified 81 operational stakeholders, of which 29 responded to the consultation. In addition, there were a large number of additional individual aviation stakeholders (private individuals) who contributed to the consultation.</p>	36% (29)
1.4	<p>What % of all environmental consultees replied? (Include actual numbers).</p> <p>The sponsor identified 104 environmental consultees, of which 46 responded to the consultation. The consultation also received a large number of responses from private individuals.</p>	44% (46)
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>In addition to the 2 public meetings held by the sponsor, the consultation was extended from 8 to 12 weeks at the request of stakeholders to enable responses to be submitted. Hastening e-mails were also sent to the primary stakeholder list on xx October 2016</p>	YES

1.6	<p>Have all objections to the change proposal been resolved (or sufficiently mitigated)?</p>	YES
<p>Objections to the proposal fell into 4 broad categories:</p> <ul style="list-style-type: none"> • Environmental impact (aircraft 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> • Access to the proposed airspace. <p>A key General Aviation objection related to access arrangements to the requested airspace. Following the consultation the sponsor sought to mitigate the impact of the proposal by reducing the size of the requested airspace. In addition, several meetings between the sponsor and GA representatives were facilitated by the CAA, with input from FASVIG, to explore options for access arrangements and the flexible use of airspace in order to mitigate GA concerns. These meetings were unsuccessful due to GA representatives not wishing to discuss those matters, instead opting to press for an alternative proposal. The sponsor remained adamant that the alternative proposal did not meets its operational requirements. Subsequently, the CAA requested that TAG Farnborough provide details of the proposed access arrangements that would be available to other airspace users in the event that the proposal was approved in order to continue its assessment of the proposal</p> • Safety <p>A further GA objection revolved around the perceived funneling of aircraft outside controlled airspace. Again the sponsor sought to mitigate that concern by taking steps to reduce the volume of airspace requested and by agreeing to explore access arrangement during the CAA-facilitated meetings.</p> • Justification for the proposed change. <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</p> 		

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.

A number of process objections were received concerning the consultation that split into the following categories:

- Accessibility.
- Documentation and Publicity.

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 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 with the information required 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.

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
<p>Whilst this was a controversial proposal, the sponsor undertook a comprehensive consultation and demonstrated a willingness to engage with stakeholders that was a characteristic the original consultation. The sponsor correctly identified primary stakeholders and the evidence presented suggests that, whilst being unable to resolve all the objections received, had taken conscientious consideration of them. The issues raised by consultees were correctly identified by the sponsor and rational responses provided in the consultation feedback document. The consultation was originally agreed as 8 weeks in duration, but the sponsor was alive to stakeholder concerns and extended the period to 12 weeks. The willingness of the sponsor to consider changes to the proposal following the consultation and the ongoing meetings to consider access arrangements and flexible use of airspace indication that the outcome of the proposal was not in any way predisposed.</p>
Comments

N/A
Observations
N/A

Consultation Assessment Sign-off/Approvals			
	Name	Signature	Date
Consultation Assessment completed by (Airspace Regulator (Coordination))	██████████	██████████	30/11/2017
Consultation Assessment approved by ██████████	██████████	██████████	12/01/2018

SARG Comment/Approval		
Name	Signature	Date