

# London Luton Airport Operations Ltd FASI-S Airspace Change Proposal Stage 2

## Appendix C - Stakeholder Feedback



London  
Luton  
Airport

# **COMMUNITY GROUP & LOCAL STAKEHOLDERS FEEDBACK**

**MARCH-APRIL 2020**

## RESPONSE: Luton FASI-S Options

[REDACTED]  
Tue 10/03/2020 14:02

To: Airspace Modernisation <AirspaceModernisation@ltn.aero>

Cc: [REDACTED]

This feedback on Luton FASI-S development options is based upon the LLAOL “approach” & look forward to your feedback

### [1] Inadequate Explanation:

Descriptive terms for FASI-S W2-W7, E1-E6 such as “improvement” or “where possible” or “respite” need greater definition as to the rationale & what is to be expected from the design option

### [2] Current Situation Comparison:

Altitude is the critical factor for resident respite so the attitude charts [p91/92] need to illustrate the current average status alongside the proposal to allow comparison

### [3] Climb Gradient:

The FASI-S altitude charts [p91/92] suggest 8% continuous climb gradient is insufficient for meaningful improvement in altitude/respite across the region so can this be improved to 10% which is achieved elsewhere

### [4] W6: Runway 26 MATCH:

How does the inner split SID offer respite at c3-4000ft which widens the ground noise envelope, increases the affected population, & makes no contribution to equitable distribution as the gap between the 2 left turn SIDs is too small.

### [5] W2-W5 Runway 26 MATCH:

What are the FASI-S benefits of a “north of BPK” routing soon after a left turn at c5,000ft which shifts the airtraffic impact closer to residential areas & is completely at odds with the W1 PBN move in the opposite direction. What is the qualification that would explain the rationale.

### [6] Gliding Club:

Why has LLAOL not challenged the gliding club in providing more flexible use of airspace for FASI-S as all users in the region are affected. The club has a 220 membership which is in decline whereas the consequences of their intransigence affects 10,000s of residents. The FASI-S Design Principle states “minimise the impact on other airspace users” – not eliminate it altogether.

[REDACTED] r [www.HarpendenSky.com](http://www.HarpendenSky.com) [REDACTED]

## Chilterns Conservation Board's response on London Luton Airport Airspace Change

Planning <Planning@chilternsaonb.org>

Wed 18/03/2020 11:38

To: Airspace Modernisation <AirspaceModernisation@ltn.aero>

Cc: [REDACTED]

📎 1 attachments (349 KB)

CCB response on Luton flightpaths 180320.pdf;

Dear [REDACTED]

Please find attached letter of response following up on the engagement session you held on 18th

[REDACTED] attended this session for Chilterns Conservation Board and has assisted with the response, so I am copying him in and he will continue to be involved in advising us on this work on airspace change.

Please can you add [REDACTED] to you contacts list, as well as continuing to contact us at [planning@chilternsaonb.org](mailto:planning@chilternsaonb.org).

Kind regards,

[REDACTED]  
[REDACTED]  
**Planning Officer**  
**Chilterns Conservation Board**

[REDACTED]  
[planning@chilternsaonb.org](mailto:planning@chilternsaonb.org)





Contact: [REDACTED]  
Tel: [REDACTED]  
Fax: [REDACTED]  
E Mail: [planning@chilternsaonb.org](mailto:planning@chilternsaonb.org)  
[www.chilternsaonb.org](http://www.chilternsaonb.org)  
18<sup>th</sup> March 2020

Chairman: [REDACTED]  
Vice Chairman: [REDACTED]  
Chief Executive Officer: [REDACTED]

[REDACTED]  
London Luton Airport Airspace Change  
**By email only to [AirspaceModernisation@ltn.aero](mailto:AirspaceModernisation@ltn.aero)**  
Cc: [REDACTED]  
My Ref.: [REDACTED]

## London Luton Airport Airspace Change

Dear [REDACTED]

Thank you for inviting the Chilterns Conservation Board to your engagement session on 18<sup>th</sup> February and sending the detailed slides afterwards for comment. [REDACTED] attended the engagement session on behalf of the Chilterns Conservation Board.

The Chilterns Conservation Board is a statutory body, established by Parliamentary Order. We work to conserve and enhance the natural beauty of the Chilterns Area of Outstanding Natural Beauty and to increase understanding and enjoyment of it (see Appendix 1). We represent both those who live in and enjoy the Chilterns AONB. Our Board is made up of representatives nominated by the organisations listed in Appendix 2.

The Chilterns Area of Outstanding Natural Beauty lies north and west of Luton Airport.

**CAP1616 requires specific attention is given to tranquillity of AONBs.** Great weight should be given to minimising over-flying of the Chilterns AONB. The opportunity should be taken to re-prioritise the AONB and re-organise airspace to reduce overflying of the AONB and improve the tranquillity of one of the country's finest landscapes and a nationally important visitor destination. Tranquil valleys are one of the identified special qualities of the Chilterns AONB identified in the statutory [Chilterns AONB Management Plan](#).

Luton Airport is only 2km from the Chilterns AONB. Aircraft arrivals and departures from Luton Airport are one of the most significant sources of noise in the whole AONB. This photograph displays clearly the airport's location on a plateau in the Chiltern hills, with the runway pointing directly over the Chilterns AONB:



The Chilterns Hills AONB is a high chalk ridge, so taking account of actual ground levels is important, rather than height above mean sea level. Visitors and residents on the top of the Chiltern Hills at 850ft above sea level will experience aircraft passing lower than those on the river flood plain.

People experience aircraft noise most when they are outdoors. Effects of overflying the AONB include the loss of tranquillity resulting from aircraft noise, visual effects of seeing aircraft move through the sky, contrails and lights from aircraft. Peaceful leisure time should be recognised as important; the consideration is not only noise over where people live, but where they recreate. Flightpaths should take account of where people visit for leisure time and when people are more likely to be outdoors in the Chilterns AONB. The highest numbers of visitors to the Chilterns AONB are found at weekends and holiday periods, so respite at those times would benefit more people enjoying outdoor activities. Over 10 million people live within an hour's travel of the Chilterns AONB, and over 55 million leisure visits are made to and within the Chilterns AONB every year.

**In summary, we are looking for an airspace change that provides quieter, cleaner, greener, more tranquil scenario over the Chilterns AONB than the existing situation.** Airspace change should bring better protection the Chilterns AONB as a strategic greenspace resource and one of the nation's finest landscapes. We welcome the scope for modern satellite navigation, steeper climb profiles and quieter aircraft to improve the current situation.

## Analysis of proposals

### **1. SAIP AD6 [Swanwick Airspace Improvement Programme, Airspace Deployment 6]**

We note the forthcoming formal consultation on these proposals, to which we will be responding.

Without prejudging this response, it is likely that we will be welcoming those aspects of the changes which will lead to the removal or reduction of overflights from some areas of the Chilterns AONB; but seeking some small-scale adjustments to the inbound routes for easterly landings, and measures to require aircraft to be kept on the prescribed routes in order to realise the full benefits of the proposed changes for the AONB.

### **2. Runway 26 MATCH Airspace change**

We note that investigations have concluded that no changes to the routes and procedures is possible in the short term. However, we observe that the first part of the departure route off westerlies overflies the AONB within Markyate and Flamstead parishes at quite low levels, so there is a continued need for noise reduction and mitigation measures to reduce impacts on the Chilterns AONB. These should include meaningful measures to incentivise quieter aircraft to use the airport in lieu of older noisier ones, and the design and adherence to aircraft operating procedures which will reduce noise.

### **3. FASI-South**

We note that Luton Airport is at Stage 2 of the airspace change process: so the Design Principles have been consulted on and agreed by the CAA, and the current task involves long-listing route options which comply with these principles, for the next stage of quantitative work on these options (assessing noise, fuel-burn etc).

We understand and recognise the logical and thorough process used to create the menu of potential routes, and then make a preliminary assessment of their merits against Design Principles 5 and 6 (equitable distribution of traffic and avoidance of multiple routes).

Even though the AONB is not mentioned within the Design Principles, it is required by CAP1616 and other government guidance, and thus implicit within Design Principle 2 [“Must meet the 3 aims of the NPSe, Air Navigation Guidance 2017 and all appropriate Government aviation policies, and updates thereof”], that specific attention is given to the tranquillity of AONBs.

It is only through assessing impacts on the AONB and making decisions accordingly that you can demonstrate that you have had regard to the AONB, as required by [Section 85 of the Countryside and Rights of Way Act 2000](#) which places a statutory duty on public bodies, including NATS and CAA, to have regard to the purpose of conserving and enhancing the natural beauty of AONBs when coming to decisions or carrying out their activities relating to, or affecting, land within these areas.

**We ask therefore that the necessary information and evidence base about impact on the AONB is drawn up now, and used in the next stage of work to develop and assess options.**

In essence, the assessment that we seek of the noise implications of the potential new flightpaths needs to consider:

1. How much noise would be experienced under the flightpaths
2. How wide an area would be impacted below any given flightpath line on the map
3. How frequently each flightpath would be used
4. How the impacts of 1 to 3 above compare with the existing situation.

As the process develops, and the number of route options is reduced, detailed noise assessments are likely to be required as set out in Appendix B of CAP1616. **But, as part of the assessment process, we believe meaningful and worthwhile judgements can be made now on the basis of the information available**, and we offer our initial thoughts here:

When considered from a pure minimising-overflight-of-AONB viewpoint, the best options are as follows:

Westerly Arrivals: immaterial, all routes avoid AONB

Westerly Departures:

- for departures to west and north, favour early right turn to go north of Dunstable, then remain outside of AONB, akin to W7; **and why can't the right turn be even earlier? (analogous to new MATCH proposed in W6) - which could, with a slight reduction in the area delegated to Dunstable gliding, allow it to be used all the time, bringing major benefits to the AONB.**
- for departures to east and south-east, favour early left turn proposed under W6, because this would avoid AONB.

Easterly Arrivals: we favour the northward shift of the route proposed under options E2-E6.

Easterly Departures:

- for departures to north, favour retention of current turning point, and NOT the earlier turn proposed in E5 and E6. It would be better still if the route could be moved even marginally further north to remain outside the AONB rather than run along its northern edge.
- (the All options diagram also implies an option of an earlier right-hand turn for departures to the west, but we can't find this within the individual options; if it is a live option, we would oppose such an earlier turn.)
- for departures to east and south-east, immaterial, all routes avoid AONB.

However, we recognise that the above suite of preferences (that most closely resembles W7 with either E2, E3 or E4) does not score as highly as others in terms of equitable distribution of traffic, with some places outside AONB being overflown by routes during both runway directions.

So potentially acceptable variants might be:

Westerly Arrivals: immaterial, all routes avoid AONB

Westerly Departures: as long as departures to west and north get early right turn to go north of Dunstable, then remain outside of AONB (akin to W7), then a retained later left turn for (some?)



departures to east and south-east, despite continued incursion into AONB, may be acceptable [to provide respite for communities SSE of Luton].

Easterly operations: as long as the choices are made for the northern route option for arrivals, and, for departures to north, the delayed and wider left turn to go along northern edge of AONB, or further north if possible, then an earlier right turn for departures to west may be acceptable [with continuous climb and higher climb profile, it will still be higher than now over AONB, and the early right turn should provide more flexibility for multiple routes for departures to east and south-east].

Additionally,

If it proves impossible to achieve departure routes to north of Dunstable off westerlies (meaning all westerly departures to west and north will still overfly AONB), the use of a left turn for easterly departures to the west might be preferable to spread the burden, as long as the delayed version of the left turn is chosen, and the route taken is on or north of the AONB edge.

In relation to Dunstable Downs gliding area: if it not possible to take westerly departures to the west / north north of it, even with a small reduction in the delegated area, then a more flexible and responsive system should be used to delegate the airspace, so that it is only delegated when actually being used (so not an open-ended dawn to dusk arrangement).

The above initial semi-quantitative assessment of routes assumes that the desired continuous climb and descent to 7000ft is achieved. This is a major contributor to reducing noise, so should be given due priority in selection of routes: routes which do not allow for this due to interactions with other routes, should be given less weight, and this may have a bearing on the resultant overall package. The current interactions between Heathrow and Luton traffic significantly affect the Chilterns AONB, and it is crucial that redesign of airspace realises the opportunities for the removal holding areas above the Chilterns AONB and the knock-on effect of keeping Heathrow and Luton departures low.

Further work requested in relation to noise and tranquillity

Particularly useful for the detailed design of routes, would be mapping of the AONB for existing ambient noise levels, and the identification of the most visited and valued quiet areas. This could help ensure that decisions are evidence based to protect the most iconic places, e.g. visitor hotspots such as Ivinghoe Beacon, the Ridgeway National Trail, the Ashridge National Trust estate), recognising their importance for quiet recreation, health and wellbeing.

Also potentially relevant to the assessment of tranquillity, as well as noise, are the impacts of

1. **Visual intrusion from aircraft:** motion from over flying aircraft at all heights. It is already commonplace to be able to see and hear several aircraft at once.
2. **Perceived loss of tranquillity:** the combination of aural and visual intrusion and associated sense of activity deprives much of the Chilterns of the sense of tranquillity which it should have and deserves as a nationally protected area. People walking, cycling, riding or volunteering in the AONB are likely to be outdoors and expecting to enjoy an experience of 'getting away from it all'. They are more noise sensitive than those indoors
3. **Disturbance:** especially night flights and early and late arrivals
4. **Levels of air pollution** and effects on plants and sensitive habitats in the Chilterns including protected sites of national and international importance

Next steps

We would welcome the Chilterns Conservation Board being involved in the proposals going forward to ensure that full and proper account is taken of the need to conserve and enhance the natural beauty of the AONB, which has the same status in planning as a National Park, including opportunities taken for flightpath changes to reduce overflying of the AONB.

For info, the Chilterns Conservation Board is a statutory consultee for National Policy Statement consultations, a prescribed consultee for major infrastructure projects that affect the Chilterns AONB and an interested party for examinations in connection with Nationally Significant Infrastructure Projects that may affect the Chilterns AONB (as set out in the Infrastructure Planning (National Policy Statement Consultation) Regulations (2009), the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations (2009) and the Infrastructure Planning (Interested Parties) Regulations (2010).

Should you require any further information please do not hesitate to contact me.

Yours sincerely,



**Planning Officer**

**For and on behalf of the Chilterns Conservation Board**

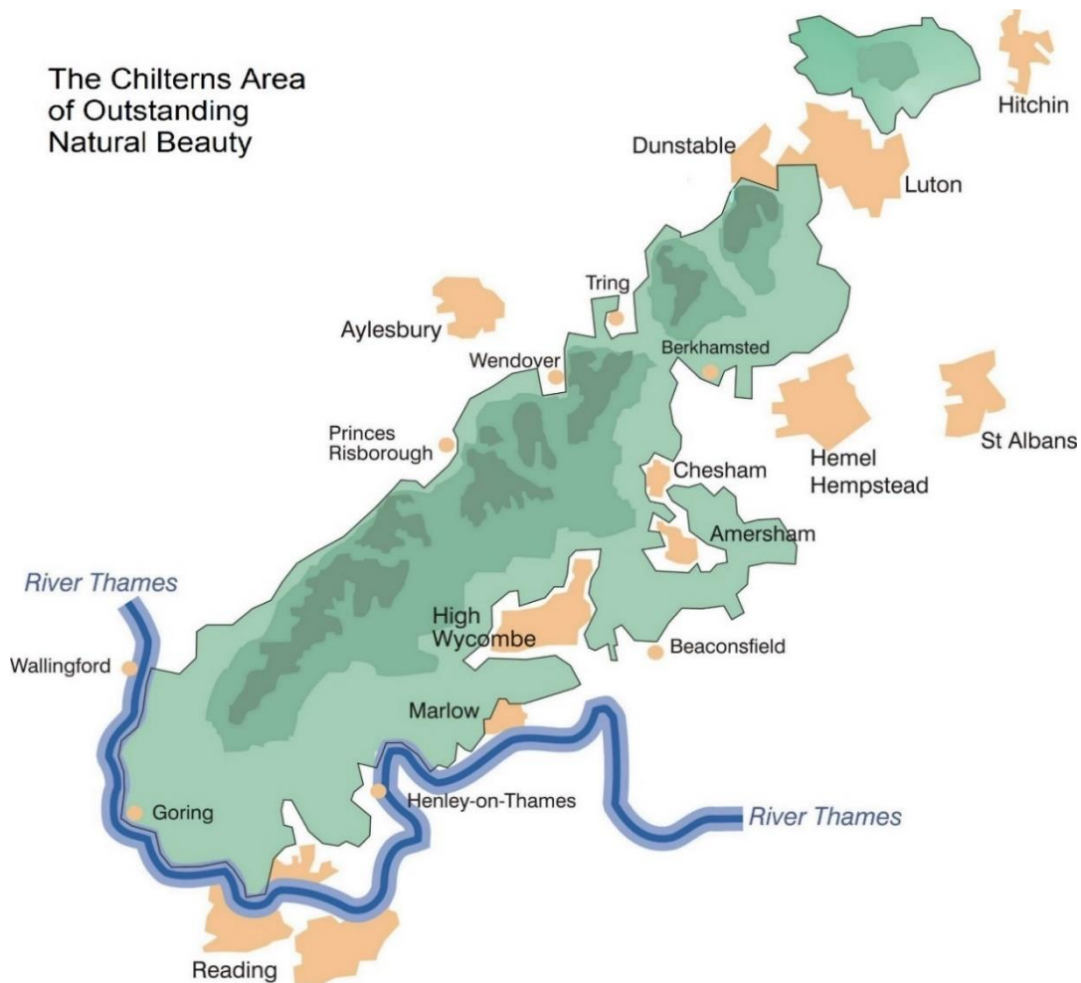


**The Chilterns Area of Outstanding Natural Beauty**

Areas of Outstanding Natural Beauty are designated by the Government for the purpose of ensuring that the special qualities of the finest landscapes in England and Wales are conserved and enhanced.

The Chilterns AONB was designated in 1965 for the natural beauty of its landscape and its natural and cultural heritage. In particular, it was designated to protect its special qualities which include the steep chalk escarpment with areas of flower-rich downland, woodlands, commons, tranquil valleys, the network of ancient routes, villages with their brick and flint houses, chalk streams and a rich historic environment of hillforts and chalk figures.

The map below shows the boundary of the Chilterns AONB in green.





### **Chilterns Conservation Board**

The Chilterns Conservation Board is a statutory independent corporate body set up by Parliamentary Order in 2004 under the provisions of Section 86 of the Countryside and Rights of Way (CRoW) Act 2000.

The Board has two statutory purposes under section 87 of the CRoW Act:

- a) To conserve and enhance the natural beauty of the AONB; and
- b) To increase the understanding and enjoyment by the public of the special qualities of the AONB.

In fulfilling these roles, if it appears that there is a conflict between those purposes, Conservation Boards are to attach greater weight to (a). The Board also has a duty to seek to foster the economic and social well-being of local communities within the AONB.

Like all public bodies, including ministers of the Crown, local authorities and parish councils, the Chilterns Conservation Board is subject to Section 85 of the CRoW Act which states under “General duty of public bodies etc”

“(1) In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty.”

### **List of Organisations providing Nominees to the Chilterns AONB Conservation Board**

The Chilterns Conservation Board has 27 board members, all drawn from local communities:

- Buckinghamshire, Hertfordshire and Oxfordshire County Councils
- Central Bedfordshire and Luton Borough Councils (unitary authorities)
- Aylesbury Vale, Chiltern, North Hertfordshire, South Buckinghamshire, South Oxfordshire, Three Rivers and Wycombe District Councils
- Dacorum Borough Council
- The Central Bedfordshire, Buckinghamshire, Hertfordshire and Oxfordshire Parish Councils (6 elected in total), and
- DEFRA (8 in total).

## Feedback on FASI-S ACP options

[REDACTED]

Tue 24/03/2020 10:22

To: Airspace Modernisation <AirspaceModernisation@ltn.aero>

Hi,

Please find attached the feedback from LADACAN members on the FASI-S options presented at and after the Airspace Engagement Day.

It would be helpful if you could acknowledge safe receipt.

Many thanks

[REDACTED]

LADACAN

## LLA FASI-S ACP - LADACAN response to stage 2a consultation

### Evaluation objective

Our understanding is that the current evaluation should provide feedback on the design options against the following criteria from CAP1616 Ed 3:

*“Step 2A requires the change sponsor to develop a first comprehensive list of options ... that address the Statement of Need and that align with the design principles from Stage 1. The change sponsor preliminarily tests these with the same stakeholders it engaged with in Step 1B to ensure that they are satisfied that the design options are aligned with the design principles and that the change sponsor has properly understood and accounted for stakeholder concerns specifically related to the design options.”*

The proposed questions from the sponsor are:

- Have we developed a comprehensive list of options which are aligned with the design principles?
- Are there any further options you think we need to explore to meet the design principles?
- Do you think the way we have shown the equitable spread of aircraft (by using percentages on the routes) is reasonable?
- Do you think that our overall approach to design options development is comprehensive?

The first two questions omit reference to the Statement of Need so we have included that aspect in our response.

The fourth question covers the same ground as the first two, so in the light of CAP1616 guidance we have replaced it with:

- Do you think we have understood and properly accounted for stakeholder concerns?

Our response is based on the attendance at ACP Focus Group meetings and the Airspace Change Event, and on feedback from LADACAN members in response to the consultation slides.

### Evaluation response

#### **1) Have we developed a comprehensive list of options which are aligned with the design principles and the Statement of Need?**

1.1) The Statement of Need is very weak when compared to the significant local issues caused by current airspace design. LLA has made firm public commitments such as “getting aircraft to 10,000ft by the railway line” and “continuous climb departures” and “mitigating noise on the Match departure route by Airspace change”. We would expect the SoN to reflect these bold objectives. Instead it simply says:

The Department for Transport have notified aviation stakeholders via the Upgrading UK airspace: strategic rationale, published in February 2017, that the controlled airspace in southern England used to support commercial air transport operations is capacity constrained, it has evolved over time and does not exploit modern navigation technology.

The Future Airspace Strategy Implementation South (FASI South) programme has been established by NATS and a number of key airports operating in southern England, including London Luton Airport Operations Ltd. to coordinate a series of linked ACPs that will modernise the overall airspace structure and route network.

London Luton Airport Operations Ltd is using this opportunity to look at options of aircraft reaching higher altitudes sooner on departure and remaining higher for longer on arrival enabling significant environmental benefits.

And despite the commitments to get aircraft to 10,000ft – and the general airspace modernisation concept of letterboxes at 9,000ft, the altitude effects are limited to below 7,000ft:

Please specify the altitudes (where applicable) affected by your Statement of Need:

- Surface to below 4,000 feet
- 4,000 feet to below 7,000 feet
- 7,000 feet to below 20,000 feet
- 20,000 feet and above

**LADACAN feedback:**

The final section in the Statement of Need is non-committal and only covers part of the options: *“London Luton Airport Operations Ltd is using this opportunity to look at options of aircraft reaching higher altitudes sooner on departure and remaining higher for longer on arrival enabling significant environmental benefits.”*

Instead, we suggest it should be worded more as follows to indicate the need and determination: *“London Luton Airport Operations Ltd is using this opportunity to reduce significant environmental impacts arising from current airspace constraints by actively exploring a more equitable distribution of flights, continuous climb departures and environmentally optimised arrivals on all its routes.”*

It should also be made more explicit that the commitment to achieve continuous climb extends beyond 7,000ft.

1.2) In respect of whether the set of options is comprehensive, we would note that despite early commitments to engage proactively with the London Gliding Club, little seems to have emerged except a restatement of the existing constraints.

We note that the shapes of design areas are shown, but that some of the designs fall outside of the design areas. This may be because the easterly departure pattern has been reflected on westerly departures, where a more aggressive first turn is currently achieved.

**LADACAN feedback:**

The numbers of people affected by environmental impact from Luton Airport far outweighs the numbers of people using the gliding club, and we would expect a clearer and more explicit review of options with regard to that airspace based on some serious negotiations including:

- Possibilities to alter, move or constrain gliding club airspace
- More proactive ways to determine when gliding club airspace is actually going to be used
- All possible technical means to cohabit more closely whilst still operating safely

We also note that the design envelope has been constrained by operations at Northolt but that Heathrow and City influences have not been explicitly shown. The southerly constraint is not clearly justified.

Some parts of some of the design options fall outside the design area constraints. This suggests that the design areas are not sufficiently comprehensive – for example the tight first turn on the existing westerly departures could be reflected onto the easterly options if beneficial.

1.3) In respect of whether the options are in accordance with the Design Principles, we note that the CAA-imposed overriding principle that the designs accord with CAP 1711 may well need clarification in light of the ruling that the Aviation National Policy Statement has been ruled unlawful, and hence the presumed expansion at Heathrow thrown into some doubt.

In other respects, we are pleased to note that our previous feedback that offloading Match northerly respite onto existing Compton and Olney tracks is inequitable, seems to have been taken on board. At Stage 2B the sponsor will need to demonstrate consistent application of the Principles.

**LADACAN feedback:**

Please obtain clarification in relation to the implications of the Airspace Modernisation Strategy, CAP 1711 and the Aviation National Policy Statement and make these clear to stakeholders as required by the CAA directive.

We are pleased to note that the Design Principles are being applied when options are considered.

**2) Are there other options we need to consider to accord with the Design Principles and Statement of Need?**

2.1) It is clear from the options presented that not all potential paths for flyable departures are being considered. Although a constraint due to AD6 is mentioned, and a constraint due to Northolt, the other constraints which are affecting the selection of a subset of options should be made clearer.

**LADACAN feedback:**

Please summarise any other constraints (apart from what is safe, flyable and already disclosed) which have limited the selection of tracks to those shown.

**3) Do you think the way we have shown the equitable spread of aircraft (by using percentages on the routes) is reasonable?**

3.1) We had asked for “noise impact” information but the best we’ve got is an indication of altitudes. These look to be over-simplistic and generally 1000ft too conservative, probably because they have assumed an 8% climb gradient from zero throughout the track, whereas aircraft initially climb out at 15-20% until reaching the acceleration altitude, and at Luton they start 500ft ASL in any case.

**LADACAN feedback:**

The technique of “showing all the working” by showing each departure option paired with each arrivals option has proved confusing to those unfamiliar with the overall process. Most people we consulted on the slides said there were far too many of them and they could not understand what was being presented. By the end of the sequence it does start to become clear that the options combinations combined with the percentages can shed light on how to achieve an equitable spread. However, there may well be a better and more graphical rather than numerical way to indicate this.

The lateral spread of aircraft is not shown by the lines presented, nor is the question of whether or not there would be vectoring and what impact it may have. Showing arrivals and departures in the same colour is also confusing.

Presenting against a satellite image is very little help, likewise using a map with too large a scale. Ideally people need to be able to see zoomed-in coverage of particular areas as ideas develop, along with some reliable indication of “before” and “after” noise impact to prove that the aim of achieving continuous climb and descent on dispersed concentrated tracks will deliver benefit.



#### 4) Do you think we have understood and properly accounted for stakeholder concerns?

##### **LADACAN feedback:**

LADACAN members are not convinced that you have understood and properly accounted for stakeholder concerns, for the following reasons:

- a) The slide-pack which presents the design options is laden with jargon and acronyms which mean nothing to people outside the aviation industry. For example, in order of appearance: FASI-S, NATS, NPSe, tactical intervention, ATC, CAS, AMS, RWY08, RWY26, SFC, AD6, OLY, CPT, MATCH, PBN, vertical profile, SID
- b) The route options are mostly presented as umpteen slides of lines on satellite images which make it almost impossible to tell how they relate to towns and villages
- c) Slides showing existing tracks do not distinguish between arrivals and departures since they are all in the same colour, and do not attempt to show altitudes by (for example) using different colours for different line segments

The 290MB pack of 100 slides elicited a unanimous response from all the LADACAN members who downloaded and tried to understand it: the information is broadly unintelligible. This continues to be perceived as a process presented from an industry perspective with an industry mind-set.

To people not close to the Airspace Change Process, it comes across as a tick-box exercise where the aim is to list as many options as possible, rather than to add value by outlining the concerns, setting out the approach taken to alleviate those concerns, and explaining how the options achieve that objective.

The primary objective of FASI ACP as far as industry is concerned is to deliver additional capacity (not a stakeholder concern) and reduce fuel costs (not a direct stakeholder concern). While it may be that LLA is genuinely trying to reduce the environmental impacts of noise from its flights as part of this process, nothing in this slide pack clearly conveys that point.

We do not yet see any evidence of industry-independent communication expertise being used to present an approach which has genuinely taken on board the concerns of people on the ground and sought to create solutions which put people and those concerns higher up the agenda. It's still very technical, broadly impenetrable, presented using jargon convenient to those who are airspace designers or airport operators, and self-evidently (due to the fact that it had to be asked for and has still not been provided) produced with no thought given as to how the noise impacts of the options would be presented, or the "before" and "after" situations modelled / assessed / presented and measured for comparison.

Stakeholders are concerned about the impact of aircraft noise on their daily lives. They are becoming increasingly concerned about the impact on climate change of aviation-related carbon emissions. Nothing in this slide pack indicates that these concerns have even registered, and that itself is the most significant stakeholder concern. If FASI has any value to people on the ground, and addresses any of those concerns, now is the time to clearly explain how.

**FW: LLA Airspace Engagement Day, FASI-S Feedback response.**

[REDACTED]

Fri 27/03/2020 15:56

To: Airspace Modernisation <AirspaceModernisation@ltn.aero>

Dear Sir / Madam,

Please find attached St Albans City and District Councils response to the FASI-S consultation.

Kind Regards,

[REDACTED]

Spatial Planning Officer  
St Albans City & District Council

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**From:** [REDACTED]  
**Sent:** 25 March 2020 13:52  
**To:** [REDACTED]  
**Subject:** LLA Airspace Engagement Day on 18th Feb 2020 - FASI-S Meeting Notes

Good afternoon all,

I hope you are all well.

Thank you to those of you who have already sent in FASI-S feedback following the Airspace Engagement Day on the 18<sup>th</sup> February 2020. I have attached the redacted meeting notes from the FASI-S session.

Since the session, we have received requests from a representatives regarding the background maps and also for scales to be provided. We have updated the slide pack to show the routes with a different map and I will be sending this updated slide pack to everyone today via WeTransfer, so please do look out for this. Unfortunately we have been unable to add a scale to these maps, but for context, for the departures, every 1000ft altitude marker is 2nm (2.4 statute miles) apart and for the arrivals, every 1000ft altitude marker is 3.1nm (3.6 statute miles) apart.

Finally, in the session we asked for feedback by 31<sup>st</sup> March 2020, however, in light of the current UK situation we have agreed to extend this to 10<sup>th</sup> April 2020. Therefore please can you send any feedback to [airspacemodernisation@ltn.aero](mailto:airspacemodernisation@ltn.aero) by this date.

As always, if you have any questions, please do let me know.

Kind regards,

[REDACTED]

**Leader of the Council**

Please reply to:

[REDACTED]  
District Council Offices,  
Civic Centre, St Peter's Street  
St Albans AL1 3JE

E-mail: [REDACTED]

Date: 27/03/2020

[REDACTED]  
[AirspaceModernisation@ltn.aero](mailto:AirspaceModernisation@ltn.aero)  
(By Email)

Dear [REDACTED]

Thank you for allowing us to comment on the concept of options for stage 2a of the CAP1616 Airspace Change. We have reviewed the concept flight paths and would like to make the following comments.

The District is situated directly to the south of Luton Airport. Conflict of airspace has led to aircraft noise becoming a major issue for our residents in recent years. SADC supports the modernisation of the UK's airspace structure to reduce the impact on those affected by aircraft noise. This will be necessary if existing airports are seeking to significantly expand.

The District is particularly affected by westbound departures, in particular RWY 26 MATCH, which accounts for 35% of departures, and RWY 08 CPT, which accounts for 12% of departures. This impact is further increased by conflict with Heathrow and London City Airports flight patterns which reduce the ability for departing aircraft from Luton to climb quickly. SADC therefore strongly supports working with adjacent airports to ensure there is no conflict between flight paths.

SADC acknowledges that this is not the stage to comment on individual options in response to geographical position, and will instead comment on the approach to developing these options. SADC would support approaches that reduce the number of residents overflowed by aircraft as well as those that allow planes to climb faster. SADC would like to acknowledge that these are specific design principles set out in the previously agreed Design Principles at Stage 1b of the CAP1616 process. These include, in particular points; 4 (Enabling Continuous Climbing), 5 (Providing a Continuous Distribution of Traffic), 6 (Community Overflying) and 8 (Minimising Impact on Other Airspace Users).

Out of the options given, SADC feels that these principles are best followed within combinations W3 & E4, W3 & E5, W3 & E6, W4 & E4, W4 & E5, W4 & E6, W7 & E4, W7 & E5, and W7 & E6. SADC appreciate that reducing flight paths over one District will result in an increase over another, and that there will be a need to distribute this fairly. It is noted however that the combined option of W4 & E4 would have the lowest level of overflight for any one area out of all the options set.

SADC would like it noted under the current flight paths the district is consist of 35% of departures for RWY 26 MATCH, and 12% of departures for RWY 08 CPT, together equalling 47% of total departures flying over the district. It is felt that this is disproportionate to that of other surrounding areas.

SADC trust that the above comments will be taken into consideration. SADC remains keen to have the opportunity to provide feedback on matters affecting Luton Airport, as well as wider airspace changes.

Yours sincerely,

[REDACTED]

[REDACTED]  
**Leader**  
**St Albans City & District Council**

## FASI-S Stage2a Feedback from St. Albans Quieter Skies

[REDACTED]

Tue 31/03/2020 13:27

To: Airspace Modernisation <AirspaceModernisation@ltn.aero>

Cc: [REDACTED]

Dear Sir or Madam

Please find attached feedback from St. Albans Quieter Skies for stage 2a of the FASI airspace change process.

Yours Faithfully

[REDACTED]

For STAQS

Sent from [Mail](#) for Windows 10



St. Albans Quieter Skies  
4 Highfield Road  
Sandridge  
AL4 9BU  
31<sup>st</sup> March 2020

## FASI-S Airspace Change Proposals at LLA

### Stage 2A Consultation Feedback

St. Albans Quieter Skies appreciates the opportunity to provide feedback on the design options presented at the Putteridgebury conference centre on 18<sup>th</sup> February.

The airspace change process is following CAP1616 edition 3, and at stage 2A of the process the change sponsor has developed a set of draft route options in accordance with the Design Principles agreed at stage 1.

In providing feedback at this stage, we are required to assess if the change sponsor has:

- a) Developed a comprehensive list of options in accordance with the design principles.
- b) Are there other options that should be considered?
- c) Do the percentages shown for each route option demonstrate an equitable spread.
- d) Is the overall approach to design options comprehensive.

In response:

- a) STAQS believes that the Statement of Need should be more specific to the situation at Luton and include those commitments that the airport operator has previously indicated would be addressed within the

airspace modernisation program. This includes commitments to increased altitude for Match R26 aircraft when they cross the Midland Railway line, and an additional westerly Match departure route flying north around Luton. Although included in some of the route options, these should be included in the SoN. Some of the draft route designs include sufficient options to achieve these goals, but they should be included as priority objectives.

- b) It is surprising that there is no discussion regarding the airspace allocated to the London Gliding Club. As LLA has already expanded to 18M pax, with plans proposed for 32M and possibly more, with the change sponsors wish that routes should be “future proofed”, the restrictions on the airspace limit the options available. There needs to be an explanation of why the restrictions are just accepted as a matter of fact. What conversations have taken place to explore changes to the restricted area or the times when it might be available?
- c) The percentages shown for each route option appear to be based on 2018 figures. With the growth in traffic to east European destinations that we have seen in recent years, there is a case that Match should already show 55% of traffic and the trend is for that loading to continue upwards.
- d) The overall approach to design options is reasonable comprehensive, but clearly the task of presenting options combined with options makes for a complex document where only the final routes selected for development will ultimately remain. We welcome the approach to use multiple routes and thereby enable a more equitable distribution of traffic.



For St. Albans Quieter Skies

## Reponse to FASI- S presentation on the design principles

[REDACTED]  
Fri 03/04/2020 16:16

To: Airspace Modernisation <AirspaceModernisation@ltn.aero>

Cc: [REDACTED]

Thank you for providing the full presentation of the next stage of the design for the revised airspace and all the work that has been put in providing this for the community to comment on.

Having one through the information and given the current restrictions on public meetings, the HAPTC would comment on the FASI- S proposals as follows:

The presentation although comprehensive in its detail it did seem rather confusing even given the additional overlay information, and has been quite difficult to disseminate into digestible information for the Councils. [REDACTED] and I had planned to hold a meeting on 18 March however given the Covid-19 circumstances it was cancelled, the Councils have therefore not been able to comment in full at this time.

However I was able to ascertain a general consensus which in the main centred on following:

1. The aircraft should fly at a continuous ascent to gain height to 7,000ft
2. Use of respite routes, including using the airspace over Dunstable gliding club should be a priority
3. Much greater efforts should be made to negotiate with the gliding club to accommodate respite routes that use their given airspace.

### In answer to your proseed questions:

- Have we developed a comprehensive list of options which are aligned with the design principles?

**Yes we believe you have**

- Are there any further options you think we need to explore to meet the design principles?

**Yes, there is a need for some radical thinking on how many flights are actually required - although this was not in the design principles, it is something in this new age we now live in that should be part of the design principles.**

- Do you think the way we have shown the equitable spread of aircraft (by using percentages on the routes) is reasonable?

**There is still a concentration in certain areas, and there still does not seem an equitable distribution between Bedfordshire and Hertfordshire, given that Hertfordshire are still taking the brunt of incoming and departing aircraft**

- Do you think that our overall approach to design options development is comprehensive?

**We believe, as above, that the criteria has been based on continuing the premise of flying over Hertfordshire rather than Bedfordshire, we understand your argument that there are some impracticalities in moving flights over Bedfordshire, but given that this is a 'complete new approach to air traffic movement' we feel this hasn't been fully explored and rather a negative attitude to doing so.**

Kind regards  
[REDACTED]

## Kings Walden Parish Council Response FASI-S



Mon 06/04/2020 13:40

To: Airspace Modernisation <AirspaceModernisation@ltn.aero>

***Kings Walden Parish Council believes that the interests of the community closest to the runway (Breachwood Green) would be best served by planes, on take-off, making a [10-15](#) degree track change South at 400ft (or as soon as permissible) thus avoiding overflying it.***



## Comments following meeting of 18th March

[REDACTED]

Tue 07/04/2020 13:02

To: Airspace Modernisation <AirspaceModernisation@ltn.aero>

Dear [REDACTED]

Kings Walden Parish Council makes the following feedback on the minutes of the meeting of 18<sup>th</sup> March 2020.

1. **Participants:** There is no such body as Breachwood Green Parish Council. Kings Walden Parish Council is the elected body which represents the villages of Breachwood Green, Kings Walden and Ley Green along with the hamlets of Darley Hall, Wandon End, Lawrence End, Diamond End, Wandon Green, and Austage End (among others).
2. **Take-off Routing:** Kings Walden Parish Council believes that, while continuous ascent is desirable, the interests of the community closest to the runway (Breachwood Green) would be best served by planes, on take-off, making a 10-15 degree track change south at 400ft (or as soon as is permissible) thus avoiding overflying the built environment.
3. **Low Level Flying:** Additional weight should be given the impact on those communities where the overflight is less than 1500ft.

[REDACTED]  
Clerk to Kings Walden Parish Council  
191 High Street,  
Codicote,  
SG4 8UD  
[REDACTED]

## London Luton Airport - FASI-S ACP Feedback on designs

[Redacted]

Thu 09/04/2020 14:56

To: Airspace Modernisation <AirspaceModernisation@ltn.aero>

Dear Sir or Madam,

Thank you for the opportunity to provide feedback on the above. Our response is attached for your consideration.

Kindly acknowledge safe receipt. An email will suffice.

Kind regards,

[Redacted]

**Strategic Planning and Regeneration Officer**

Strategic Planning and Regeneration  
Dacorum Borough Council

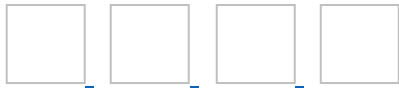
T: [Redacted]  
E: [Redacted]

A: The Forum | Marlowes | Hemel Hempstead | HP1 1DN

Dacorum is a Community Infrastructure Levy charging authority, for more information please visit [Dacorum.gov.uk/CIL](http://Dacorum.gov.uk/CIL)

 [dbcLogo 89 130](#)

[www.dacorum.gov.uk](http://www.dacorum.gov.uk)



The borough of Dacorum is in West Hertfordshire serving the towns of Hemel Hempstead, Berkhamsted and Tring and surrounding villages.

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Date: 9<sup>th</sup> April 2020  
Your reference:  
Our reference: [REDACTED]  
Contact: [REDACTED]  
Email: [REDACTED]  
Direct line: [REDACTED]



BY EMAIL: [AirspaceModernisation@luton.aero](mailto:AirspaceModernisation@luton.aero)

Dear Sir / Madam

**London Luton Airport  
FASI-S Design Options**

Thank you for the opportunity for Dacorum Borough Council (DBC) to provide feedback on the above.

This Council declared a Climate Emergency in July 2019 and is very mindful of the potential impact on the Borough of future proposed changes to the operation and capacity of London Luton Airport (LLA). It remains committed to protecting its residents and its environment from the adverse effects of LLA.

A very significant area of our Borough comprises of the Chilterns AONB which is an important environmental area, both in terms of biodiversity and tranquility.

Settlements in the Borough are also overflowed by flights operating out of a number of airports including London Heathrow in addition to LLA. For example, Markyate and Flamstead villages are both less than a kilometre from the Westerly flight path from LLA which bears approximately 70% of outgoing flights.

In common with other local authorities in the area around LLA this Borough is tasked with accommodating very significant growth. Dacorum is looking to deliver some 18,500 new homes to 2036 which will see growth in existing settlements.

Accordingly, adverse impacts upon noise and air quality levels are of considerable importance to those who live and work in the Borough and to those who visit it. We have considered the information provided and welcome measures that would reduce any adverse impact arising from operations at LLA and other airports.

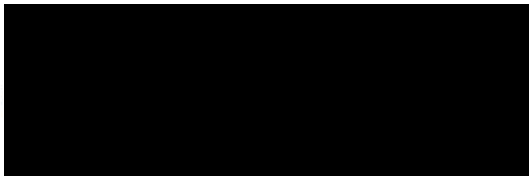
The aim of achieving reduction in noise and fuel usage and improvements to air quality are to be welcomed. We have concerns, however, that those aims may be compromised regarding operations around LLA by the proposed reduction in the LLA FASI-S airspace where it overlaps with Northolt Airport FASI-S airspace. We would like to see what design options for flightpaths may be available if the LLA FASI-S airspace remained at its present limits, or was even slightly expanded. We are concerned that the correct balance between Northolt airspace and LLA airspace has not been struck in the design proposals.

The aim of more equitable dispersal and reducing impact upon surrounding areas is welcomed. A more equitable dispersion and reduction in impact generally could be achieved by better use of the airspace over the London Gliding Club. We believe that this option should be more fully explored as it would facilitate greater compliance with the CAA's AMS (CAP 1711) in particular the need to make the best use of the existing runway by offering more optimal performance for arrivals and departures at LLA.

In general terms, of the design options offered, we believe that option 4 followed by option 5 offer the most equitable options and may mitigate negative impact compared to the other design options offered. However, we remain strongly of the view that better options could be available by utilising the airspace around the London Gliding Club as mentioned above and would urge that further work is carried out to explore the design options utilising this area.

We ask that you consider this response when progressing the design options and again would strongly urge that you reconsider the design options offered to date.

Yours faithfully



  
**Assistant Director (Planning, Development & Regeneration)**

## BMKALC response to FASI-S

[REDACTED]  
Fri 10/04/2020 15:48

To: Airspace Modernisation <AirspaceModernisation@ltn.aero>

Dear [REDACTED]

Thank you for the opportunity to comment on LLAOL's approach to FASI-S (below), helped by the additional information provided after the February meeting. I hope everyone at LLA is safe and well under these strained circumstances.

All the very best and kind regards

[REDACTED]  
BMKALC

1.

Given the circumstances, I am surprised that LLAOL is continuing with this consultation. Many stakeholders other than BMKALC must be focusing on more pressing issues; the workload is immense for my colleagues, trying to get to grips with a plethora of new legal requirements, not all of them clear and helpful, and implementing many community protection initiatives. Given that the CAA has paused its FASI-S Master Plan consultation, pausing LLAOL's parallel consultation would not be unreasonable or detrimental to the overall project.

2.

In addition to the pandemic, aviation policy is suffering a hiatus because of the Judicial Review regarding climate change considerations. Consequently, should the Government amend its aviation policy, this would require a review of airspace policy and its long-term objectives and requirements. Should LLAOL carry on regardless in the meantime, then that is indeed putting the cart before the horse.

3.

LLAOL's approach to FASI-S is commensurate with that of AD6 that has failed to pass Gateway 3b (CAP 1616) for fundamental, not just "technical", reasons. Asking consultees to comment on FASI-S now, which might be forced to change because of a reassessment of AD6, is incongruous.

4. Just one approach to FASI-S is on the table – the '7000ft ring' approach. This has resulted in a plethora of environmentally harmful flightpaths (e.g. overflying new communities; greater impact over parts of the Chilterns). Consultees should therefore have the opportunity to consider more than one approach.
  
5. Is a universal 8% climb gradient and 3% CDA realistic? What is the tolerance of LLAOL's 7000ft-ring approach to changes to these gradients?
  
6. As I argued in BMKALC's AD6 response, the policy of avoiding Leighton Buzzard should be reviewed, or at least options placed on the table that overfly the town so that the environmental benefits and disbenefits can be transparently compared by stakeholders. Please note that LB has a population of about 40,000, whereas Aylesbury's is about 75,000. Options that treat these two towns equitably must be publicly scrutinised.
  
7. NPPF 2012 (revised 2019) para 182 states: "Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established." In this regard, the rights of the London Gliding Club should be respected, whatever the clamour to have them compromise their operations to facilitate airspace restructuring / revised management for other airspace users.
  
8. LLAOL's preferred outcome of "an equitable distribution of traffic" ignores other environmental requirements and constraints as incorporated but not detailed in Design Principle 2. For example, a significant increase in flights leads to high stress levels and associated health issues that cannot be glossed over. Alternative outcomes should be presented to stakeholders for an informed discussion regarding the impact-options for our communities. Further, relying on altitude as a measure of noise impact is incomplete, unscientific and misleading.

9.

Another problem with attempting to achieve an "equitable distribution" is the number of routes that have been produced. This looks inherently unsafe to me (a non-aviator) and ripe for confusion amongst pilots and ATCs. Technology is a useful tool, not a panacea, and must not be relied upon 100% of the time.

---end---

# **INDUSTRY STAKEHOLDERS FEEDBACK**

**JULY- AUGUST 2021**



## [EXTERNAL] RE: LUTON AIRPORT - FASI-S ACP - STAGE 2 REQUEST FOR FEEDBACK

[REDACTED]  
Sun 25/07/2021 19:40

To: Airspace Modernisation <AirspaceModernisation@ltn.aero>

Cc: [REDACTED]

Thanks.

[REDACTED] will be responding for the British Gliding association.

Kind regards  
[REDACTED]

---

**From:** Airspace Modernisation <AirspaceModernisation@ltn.aero>

**Sent:** 23 July 2021 12:27

**Subject:** LUTON AIRPORT - FASI-S ACP - STAGE 2 REQUEST FOR FEEDBACK

Dear Stakeholder,

On 18th February 2020 Luton Airport began engagement with stakeholders on Stage 2 of our FASI-S airspace change proposal. Initially this was with community and local stakeholders, with the plan to engage with industry stakeholders in the forthcoming weeks.

As you are aware, circumstances changed in March-April 2020 and the ACP was paused. We are now able to re-start our ACP and would like to continue our Stage 2 engagement with you.

Please find attached the updated presentation, which was provided to our community stakeholders on 18th February 2020, during our Airspace Engagement Day. The purpose of this presentation is to demonstrate a number of potential different configurations of new arrival and departure routes and to what extent they could 'equitably distribute' the overflight and/or avoid overflying the same communities with multiple routes.

As a member of NATMAC, we would now welcome your feedback on these slides. The purpose of this engagement is not to seek feedback on individual route options by examining the detailed specific geographical positions of the options, but for you to explore and test our approach to developing the options and their broad concepts. We will then combine your feedback with the comments we have already received from our local and community stakeholders, and we will then be generating an updated set of options to take into a Design Principle evaluation.

Please provide feedback to the initial list of options to [airspacemodernisation@ltn.aero](mailto:airspacemodernisation@ltn.aero) **COP Monday 23 August 2021.**

We will re-engage with you on our refined designs when they are ready. We hope this will be in October 2021. May we also draw your attention to the letters between London Luton Airport and CAA regarding Airspace Modernisation which are available on the CAA Airspace Change Portal, [here](#) under 'Documents for this proposal'.

Kind Regards,



## [EXTERNAL] FW: LUTON AIRPORT - FASI-S ACP - STAGE 2 REQUEST FOR FEEDBACK

[REDACTED]  
Wed 18/08/2021 14:58

To: Airspace Modernisation <AirspaceModernisation@ltn.aero>

Cc: [REDACTED]

RAF Northolt welcomes the opportunity to provide Stakeholder feedback to this phase of the Luton FASI(S) ACP.

RAF Northolt looks forward to working closely with Luton to remove or reduce the dependencies that both airports currently experience and especially during simultaneous departures. This close interaction will allow both airports to address points highlighted in their respective Statement of Need and Design Principles, in removing dependencies, enabling continuous climbs, minimising tactical intervention by ATC and minimising the impact to other airports.

Kind Regards  
[REDACTED]  
[REDACTED]

---

**From:** Airspace Modernisation <[AirspaceModernisation@ltn.aero](mailto:AirspaceModernisation@ltn.aero)>

**Sent:** 23 July 2021 13:04

**Subject:** LUTON AIRPORT - FASI-S ACP - STAGE 2 REQUEST FOR FEEDBACK

Dear Stakeholder,

On 18th February 2020 Luton Airport began engagement with stakeholders on Stage 2 of our FASI-S airspace change proposal. Initially this was with community and local stakeholders, with the plan to engage with industry stakeholders in the forthcoming weeks.

As you are aware, circumstances changed in March-April 2020 and the ACP was paused. We are now able to re-start our ACP and would like to continue our Stage 2 engagement with you.

Please find attached the updated presentation, which was provided to our community stakeholders on 18th February 2020, during our Airspace Engagement Day. The purpose of this presentation is to demonstrate a number of potential different configurations of new arrival and departure routes and to what extent they could 'equitably distribute' the overflight and/or avoid overflying the same communities with multiple routes.

We would now welcome your feedback on these slides. The purpose of this engagement is not to seek feedback on individual route options by examining the detailed specific geographical positions of the options, but for you to explore and test our approach to developing the options and their broad concepts. We will then combine your feedback with the comments we have already received from our local and community stakeholders, and we will then be generating an updated set of options to take into a Design Principle evaluation.

Please provide feedback to the initial list of options to [airspacemodernisation@ltn.aero](mailto:airspacemodernisation@ltn.aero) **COP Monday 23 August 2021.**

We will re-engage with you on our refined designs when they are ready. We hope this will be in October 2021. May we also draw your attention to the letters between London Luton Airport and CAA regarding Airspace Modernisation which are available on the CAA Airspace Change Portal, [here](#) under 'Documents for this proposal'.

## [EXTERNAL] MOD Feedback to Luton Stage 2

[REDACTED]

Thu 19/08/2021 10:11

To: Airspace Modernisation <AirspaceModernisation@ltn.aero>

Cc: [REDACTED]

Thank you for the opportunity to provide feedback at this interim stage. The MOD continues to recognise the importance of airspace modernisation and remains committed to ensuring airspace is used safely, efficiently and flexibly. Achieving a design that allows both RAF Northolt and Luton to operate independently, or that minimises any dependency on one another's operation and minimises overflight of the same communities on one another's departure/arrival routes, remains a priority to the MOD. It is difficult to see from the presentation how the design principles have been used to shape the initial options, but anticipate that this will be covered more in the engagement planned for Oct 21 onwards. We look forward to continued engagement throughout the ACP process.

Kind regards,

[REDACTED]

[REDACTED]

**[EXTERNAL] RE: LUTON AIRPORT - FASI-S ACP - STAGE 2 - FEEDBACK DEADLINE REMINDER**

[REDACTED]  
Fri 20/08/2021 14:02

To: Airspace Modernisation <AirspaceModernisation@ltn.aero>

[REDACTED]  
Good Afternoon,

Thank for you for providing NATS the opportunity to comment on your presentation.

We note the information provided in the slides and recognise the opportunity to be involved in the development of the options in line with the TMA work. We look forward to continuing to work together with LLAOL to develop a solution which delivers airspace modernisation, especially in regard to network integration and the efficiency of aerodrome, approach and area operations.

Regards

[REDACTED]  
Manager NATS Operational Policy

M: [REDACTED]

**NATS Internal**

---

**From:** Airspace Modernisation <AirspaceModernisation@ltn.aero>

**Sent:** 16 August 2021 13:13

**Subject:** LUTON AIRPORT - FASI-S ACP - STAGE 2 - FEEDBACK DEADLINE REMINDER

Good Afternoon,

A reminder that the deadline for feedback on the Luton FASI-S ACP Stage 2 initial options is **COP Monday 23 August 2021**. Please send your feedback to [airspacemodernisation@ltn.aero](mailto:airspacemodernisation@ltn.aero).

If you have any questions, please get in touch.

Kind Regards,

## Luton FASI-S stakeholder Feedback

[REDACTED]  
Mon 23/08/2021 15:46

To: Airspace Modernisation <AirspaceModernisation@ltn.aero>

Dear Sirs,

Please find appended the feedback from the London Gliding Club.

Regards,

[REDACTED]

## **Luton FASI-S. Stakeholder Response to Stage 2A From the London Gliding Club.**

### **Summary.**

The London Gliding Club supports the development, expansion and efficient operation of LLA whilst there is no negative impact on its own operation. The London Gliding Club currently operates with the minimum required amount of airspace and any reduction in this position would render the Club unviable. The present airspace sharing arrangement continues to work well for both parties.

In general terms the Luton FASI-S proposal would seem to have minimal, if any, impact on the Gliding Club's operation but there are some generalised observations that might be worthy of consideration. Firstly it is not clear how the Luton proposals will interact with other airports. The Club understands the complexity of the airspace needs in the south of the UK but it is difficult as a stakeholder to respond in a meaningful way unless information is available from other airports FASI-S proposals so that the combined effects can be considered. Secondly the entire proposal relies on the implementation of PBN routes which clearly has capacity advantages however the present containment requirements of PBN routes results in very inefficient use of airspace as vast volumes are set aside for containment and will never have aircraft in them, precluding its use for other airspace users. The containment policy needs to be challenged in order to maximise the opportunity of meeting the majority of the design principles.

### **General and Specific Observations to the Proposal.**

The documentation has a small source of confusion by making reference to the old runway designations of 26 and 08 on page 10. It is understood that this page uses historic data compiled, in part, prior to the change of runway designation however this is likely to lead to confusion at the consultation stage unless suitably clarified.

It would seem that a principle of not having arrival routes to 07 overfly Leighton Buzzard has been factored in yet consideration is given to putting a low level departure route over the top of Luton, Dunstable and Houghton Regis. This seems at first sight to be a significant anomaly.

It would seem unlikely that the 07 arrival route north of Leighton Buzzard could be achieved without the need of additional controlled airspace, as considered and dropped from the AD6 proposal. This issue could perhaps be resolved with a challenge to the PBN containment policy or the Leighton Buzzard overflight policy. The writer is aware that the initial engagement does not seek feedback on specific routes but is challenging policies that may be inconsistent such as; PBN containment policy, versus Leighton Buzzard overflight policy versus no increased controlled airspace design principle.

██████████ on behalf of the London Gliding Club

23<sup>rd</sup> August 2021

## [EXTERNAL] LUTON AIRPORT - FASI-S ACP - STAGE 2 REQUEST FOR FEEDBACK

[REDACTED]

Mon 23/08/2021 16:28

To: Airspace Modernisation <AirspaceModernisation@ltn.aero>

Thank you for sharing your presentation used with your community stakeholders in February 2020.

Due the pause in your ACP and ensuring GDPR compliance stakeholder records may need updating, with this in mind can you please add the following people to your stakeholder list:

[REDACTED]

We appreciate the opportunity to provide feedback, particularly as the airspace around Luton and Stansted is complex. As you requested, we restrict our comments on this occasion to the change process you are following and make no comments about the merits of the options that are presented. Overall we remain supportive of Luton's Stage 2 process, though it will be important that the proposed routes carefully consider any interactions with operations at Stansted Airport, to ensure they do not compromise our ability to implement airspace arrangements that best meet our agreed design principles.

Please find below comments relating to the process for this element of Stage 2:

- Luton have shared with Stansted Airport the presentation given to community stakeholders in February 2020
- Luton have provided the opportunity for Stansted Airport to comment on the process used for this element of engagement
- From a reader's perspective it would be useful to include:
  - A slide documenting the full comprehensive list
  - Rationale of how the comprehensive list was created with links to the design principles and any other constraints that may have influenced this list
  - Scale, references and keys on maps. Whilst this presentation is not trying to seek feedback on individual options a sense of relationship between towns and other airports would be useful to aid understanding
  - Differentiation between arrivals and departures proposals for each runway end
- The broad proposals are clear on the easterly and westerly split

Regards

[REDACTED]  
**Airspace Change Programme Manager**  
Stansted Airport, Enterprise House, Bassingbourn Road, Stansted CM24 1QW

[REDACTED]

[www.stanstedairport.com](http://www.stanstedairport.com)



## [EXTERNAL] GATCO response

[REDACTED]

Mon 23/08/2021 20:37

To: Airspace Modernisation <AirspaceModernisation@ltn.aero>

Good evening,

I apologise for the late response. I have had time to read through the initial documents and only have a few comments at this stage.

1. While continuous climb departures are efficient, any climb above MSL (7000ft or 8000ft generally) can increase risk. In the London TMA currently, SIDs do not finish above these levels and require an ATC instruction, with the use of radar, to climb above it. This enables the inbounds and outbounds to be separated procedurally until the controller has capacity and confidence to use radar separations. This procedure would need to be carefully considered and any risks mitigated.
2. The need to reduce overflying communities and to minimise ATC intervention are not usually compatible. The most efficient routings for ATC are not always suitable to communities on the ground. While this is ideal we feel that it is a target that will be difficult to achieve with such limited airspace.

Thanks for allowing us the time to respond.

Kind Regards

[REDACTED]

GATCO



## FASI-S response to the Luton Proposal

[REDACTED]

Mon 23/08/2021 22:43

To: Airspace Modernisation <AirspaceModernisation@ltn.aero>

Dear Sirs,

Please find appended the response to the stakeholder engagement on behalf of the British Gliding Association.

[REDACTED]

BGA Airspace Committee

## **Luton FASI-S. The British Gliding Association Stakeholder Response to Stage 2A**

### **Summary.**

The British Gliding Association supports the development, expansion and efficient operation of LLA provided that there is no reduction in Class G airspace available to its membership.

In general terms the Luton FASI-S proposal would seem to have minimal, if any need for additional airspace. There are however some general concerns. Firstly it is not clear how the Luton proposals will interact with other airports. The BGA understands the complexity of the airspace needs in the south of the UK but it is difficult as a stakeholder to respond in a meaningful way unless information is available from other airports FASI-S proposals so that the combined effects can be considered. Secondly the entire proposal relies on the implementation of PBN routes which clearly has capacity advantages however the present containment requirements of PBN routes results in very inefficient use of airspace as vast volumes are set aside for containment and will never have aircraft in them, precluding its use for other airspace users. The containment policy needs to be challenged in order to maximise the opportunity of meeting the majority of the design principles.

### **General and Specific Observations to the Proposal.**

The documentation has a small source of confusion by making reference to the old runway designations of 26 and 08 on page 10. It is understood that this page uses historic data compiled, in part, prior to the change of runway designation however this is likely to lead to confusion at the consultation stage unless suitably clarified.

It would seem that a principle of not having arrival routes to 07 overfly Leighton Buzzard has been factored in yet consideration is given to putting a low level departure route over the top of Luton, Dunstable and Houghton Regis. This seems at first sight to be a significant anomaly.

It would seem unlikely that the 07 arrival route north of Leighton Buzzard could be achieved without the need of additional controlled airspace, as considered and dropped from the AD6 proposal. This issue could perhaps be resolved with a challenge to the PBN containment policy or the Leighton Buzzard overflight policy. The writer is aware that the initial engagement does not seek feedback on specific routes but is challenging policies that may be inconsistent such as; PBN containment policy, versus Leighton Buzzard overflight policy versus no increased controlled airspace design principle.

██████████ on behalf of the British Gliding Association

23<sup>rd</sup> August 2021

## [EXTERNAL] Heathrow Stage 2A Engagement Response

[REDACTED]  
Tue 24/08/2021 16:07

To: Airspace Modernisation <AirspaceModernisation@ltn.aero>

Good afternoon,

Please find attached Heathrow's response to your Stage 2A engagement pack.

We look forward to working collaboratively with you as our respective FASI ACPs develop.

Kind regards

[REDACTED]  
[REDACTED]  
Airspace, Noise & ATM Specialist



Heathrow Airport  
The Compass Centre, Nelson Road  
Hounslow, Middlesex, TW6 2GW

[REDACTED] [r.com/heathrowairport](http://www.heathrowairport.com/heathrowairport)

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## **LHR Response to Luton Stage 2A Engagement – 23<sup>rd</sup> August 2021**

To whom it may concern,

Heathrow Airport is responding to the Engagement material received on 23 July 2021 in respect of your FASI Airspace Change, Stage 2A. Heathrow welcomes the opportunity to respond to the proposed list of options presented in the detailed document.

The options presented in the documentation appear to be comprehensive and appear to consider the airspace currently used by Heathrow's flight operations.

Heathrow remains committed to Airspace Modernisation and has initiated an Airspace Change Proposal (ACP) to redesign our airspace in line with the Airspace Modernisation Strategy (AMS). However, we are at Stage 1 of the process and we do not yet have any detail on our options or how they may interact with the options presented in your comprehensive list.

To achieve the benefits of the AMS, Heathrow's future demands on airspace may be different to those of today. We therefore note that further engagement will be required with us when we have developed our design options in accordance with, or aligned to, the Airspace Masterplan.

Until the location and nature of the interactions between both airports' sets of options are known:

- unconstrained climb to 7000 feet cannot necessarily be assumed if interacting with Heathrow procedures;
- it is not possible to confirm, at this stage, whether all options meet your design principle to "take into account routes of other airports below 7000 feet"; and
- it is currently difficult to identify what the cumulative or net impact of the options might be, considering areas experiencing overflight from both Luton and Heathrow airports.

Heathrow is committed to working in a collaborative way, in the approach to design and to the selection of options, once we have reached Stage 2 of the ACP process and we have more detail on our own list of comprehensive airspace design options.

Therefore, while the list presented by Luton appears to be comprehensive based on current information, it may require additional options to be developed or flexibility /refinement of proposed options to ensure an optimum airspace design for both airports.

Yours faithfully,



  
Airspace, Noise and ATM Performance Manager, Heathrow

Cc: [REDACTED]  
Subject: [EXTERNAL] NERL feedback

Hi [REDACTED]

A little while ago you asked for some feedback from NERL regarding the Luton long list of options.

We have collated our response and our feedback is attached above.

Regards

[REDACTED]



[REDACTED]  
Airspace Engagement Manager

[REDACTED]

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## Luton Long List options: NERL feedback

On 3<sup>rd</sup> November 2021 NERL was asked to provide feedback on the long list of options provided by Luton. It should be noted that the following feedback is from the perspective of the NERL Network above 7000ft only. It is also worth mentioning that the wider network has not yet been developed meaning connectivity points to the network cannot be assessed at this stage for compatibility with the future NERL airspace. This therefore means that Luton should be cognisant that this assessment would need to be conducted at a later stage which may require subsequent modification to the Luton options..

Note: Further clarification required regarding the yellow and grey SID lines. Does the yellow line represent the end of the SID, a truncation point or the point at which an aircraft would be level at the SID final altitude?

### **All Time banded routes**

Respite SIDs must end at a common network entry point, in order to resolve flight planning issues and inconsistencies. It would not be possible for the network to accommodate departures utilising multiple departure routes (for respite) going to the same common point at the same time (one route in operation at any one time).

### **Westerly departures.**

Option 1: Replication (not dependent)

Replication would result in no network issues in the current airspace; however, this is unlikely to be able to achieve any improvements in the current vertical profile. Furthermore, replication of current routes would not assist in removing dependencies with adjacent airport routes.

Option 2. (not dependant)

NERL could envisage no ATC issues with this option. NERL is unsure whether this option would facilitate a higher frequency departure split for the airport. The assumptions regarding the predicted aircraft climb have not been checked therefore from an initial view, in the current airspace, this option is unlikely to be able to achieve any improvements in the vertical profile.

Option 3. Time banded (not dependant)

Respite SIDs must end at a common network entry point, in order to resolve flight planning issues and inconsistencies. NERL would prefer time banding which alternated during quiet hours i.e. over night, this helps with potential issues which can occur when an aircraft is delayed.

Option 4. Lateral replication/higher levels (dependent)

NERL agrees that this option would be dependent on adjacent airports, this would therefore be unsuitable for early deployment before other airports have deployed their changes. Assumptions regarding predicted aircraft climb have not been checked.

Option 5. Time banded (dependent)

NERL agrees that this option would be dependent on adjacent airports, this would therefore be unsuitable for possible early deployment. Respite SIDs must end at a common network entry point, in order to resolve flight planning issues and inconsistencies. NERL would prefer time banding which alternated during quiet hours i.e. over night, this helps with potential issues which can occur when an aircraft is delayed.

Option 6. Time banded left/right (dependent)

NERL agrees that this option would be dependent on adjacent airports, this would therefore be unsuitable for possible early deployment. NERL previous responses regarding time banding apply to this option. There would be concerns from the Network at the proposed changeover times to ensure that aircraft are on the correct route and appropriately separated when joining the network.

Option 7. Time banded left/right (dependent)

NERL agrees that this option would be dependent on adjacent airports, this would therefore be unsuitable for possible early deployment. NERL previous responses regarding time banding apply to this option. This option appears to give a greater ability to climb the BPK departures.

**Easterly departures.**

Option 1: Replication (not dependent)

Replication would result in no network issues in the current airspace; however this is unlikely to be able to achieve any improvements in the current vertical profile. Furthermore, replication of current routes would not assist in removing dependencies with adjacent airport routes.

Option 2: Avoiding Harpenden (Dependent)

NERL agrees that this option would be dependent on adjacent airports, this would therefore be unsuitable for possible early deployment. It would be for Luton to confirm that all aircraft expected to be flying the routes are capable of achieving the required level restrictions on these options. The Olney

SID climbing to 7000ft would require deconfliction with the Luton inbound aircraft, downwind, left hand and may result in the retention of the Tactical First Stop Altitude of 4000ft.

**Option 3: Avoiding Breachwood Green (Not dependent)**

The Olney SID climbing to 5000ft would require deconfliction with the Luton inbound aircraft, downwind, left hand and may result in the retention of the Tactical First Stop Altitude of 4000ft.

**Option 4. CPT left turn (dependent)**

NERL agrees that this option would be dependent on adjacent airports, this would therefore be unsuitable for possible early deployment. Both the Olney and CPT SID's would require deconfliction with the Luton inbound aircraft, downwind, left hand.

**Option 5. Time banded (Dependent)**

NERL agrees that this option would be dependent on adjacent airports, this would therefore be unsuitable for possible early deployment. NERL previous responses regarding time banding apply to this option.

**Arrivals.**

All of the proposed options originate from ZAGZO and as such there are no options which would represent a change to the network, therefore NERL is not commenting on the arrival options except to state that some options may present more of a challenge regarding aircraft descent profiles and as such this may require changes to the base of controlled airspace.