

# FARNBOROUGH AIRPORT FASI-S AIRSPACE CHANGE PROPOSAL

**ACP-2022-038**



## **Appendix B**

### **Stakeholder Feedback**

**VERSION 1.0**

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## EXT: Farnborough Airport Airspace Change Engagement - Stage 2 DPE feedback

Fri 26/01/2024 17:08

To:FASI-S Farnborough Airport <fasi-s@farnboroughairport.com>

Cc:

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear [REDACTED]

Thanks for the opportunity to examine and comment on your Stage 2 progress. Please receive here Gatwick's comments and response to your presentation and the Stage 2 questions raised.

Gatwick's specific comments and questions re the presentation are:

1. We would like to understand which airfields are meant by the term Farnborough "clutch" airfields? Is this: Blackbushe, Farnborough & Lasham?

2. Taking each of the slides presented in turn our comments are as follows:-

Assuming that the current ongoing PIR results in no amendments to the existing airspace for Farnborough, and no change to the current anticipated traffic pattern and population of users, therefore no change to the noted constraints, taking account of the traffic growth aspirations:

- a. First turn scenarios 1, and 2, appear likely to be compatible at current traffic levels and interactions can be managed successfully. If and when traffic increases, as per Farnborough's plans, it is likely that in both these scenarios there will be an increased possibility of interactions with Gatwick, from proposed routes between Guildford and Woking.
- b. Re Option 5, Gatwick would need to be appraised of the potential for interaction with both our Arrival and departure streams, as there are likely to be interactions with our Westerly traffic and potentially with Gatwick traffic on Route 4, unless Farnborough plan to climb more aggressively and fly over, so it is likely that more work would be needed.
- c. The First turn westerly approach, (option 5) appears acceptable to Gatwick.
- d. Any route designs proposed to the East of Farnborough could potentially interact with Gatwick westernmost FASI proposals, and as such could cause an increase in workload & interactions, which it would be desirable to monitor and manage.
- e. Re Contingency hold options Gatwick would wish to confirm that there is unlikely to be any effect on Gatwick departures to the West.
- f. The Option 1, Do nothing Scenario appears acceptable to Gatwick, provided it is possible to accommodate the traffic growth being sought.
- g. Illustrative System option 2 Runway 24, notes the possibility of upgrading to a higher PBN specification; investigation of any potential for this should be explored as Gatwick believe this would be of benefit to both Farnborough's proposals and also neighbouring airports within the airspace system as a whole.
- h. Gatwick can see no likely issues with system option 2 Runway 24.
- i. Gatwick can see no issues with system option 2 Runway 06.
- j. Option 3:
  - Option 3 Runway 24 - provided arriving traffic was further to the west this option would be acceptable to Gatwick.
  - Illustrative System option 3 RWY06 - Easterly Departure and arrival routes must not interact with Gatwick traffic.
  - Gatwick has /no opinion on moving Approaches East (i.e. Option 4, RWY 24, & 06)
- k. Option 5: Greater dependency on the wider FASI design

Option 5 RWY 24 – the apparent possibility of interaction with Gatwick traffic in South West Corner of Gatwick’s RMA would need clarifying and monitoring

Option 5 RWY06 – Gatwick can see no issues with system option 5 RWY 06

In answer to specific questions posed by Farnborough’s FASI-S ACP:

1. To our knowledge and understanding, Farnborough’s current proposals align with its FASI-South statement of need.
2. On all options shortlisted concerned with easterly operations, Potential interactions with routes to the North and West of Gatwick should be monitored as designs progress.

Positioning of potential Farnborough hold(s) to the South West may interact with Gatwick’s westward planned and existing departure options.

With regard to the potential for “enhanced PBN standard” It is Gatwick’s view that with Farnborough’s [anticipated] standard of fleet navigation specification, switching to a higher PBN specification would be beneficial to all FASI stakeholders.

Many thanks to the organisers concerned for allowing us the opportunity to gain an understanding of Farnborough’s current thinking and offer our opinion on those considerations.

Should you have further comments or question, do not hesitate to contact me on the email provided.

Kind regards

██████████  
Airspace Change Manager  
London Gatwick  
██████████

## EXT: Farnborough Airport Airspace Change Engagement - Stage 2 Feedback

Tue 23/01/2024 17:15

To: FASI-S Farnborough Airport <fasi-s@farnboroughairport.com>

Cc: DD - [REDACTED]

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Classification: Internal

Dear [REDACTED]

Thank you for the opportunity to provide feedback on Farnborough Airport's Comprehensive List of Options.

### **Do you think our current design options are aligned with our Statement of Need and Design Principles?**

The current design options appear to be aligned with Farnborough Airport's Statement of Need and Design Principles.

### **Are there any changes or additional options you would like us to consider?**

We do not have any proposed changes or additional options for you to consider at this time and we look forward to working collaboratively with Farnborough Airport with regard to our respective future airspace designs.

Kind regards,

[REDACTED]  
Airspace & ATM Change Manager

# Heathrow

The Compass Centre, Nelson Road  
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## EXT: RE: Reminder: Farnborough Airport Airspace Change Engagement - Stage 2 Workshop material - Feedback

Tue 23/01/2024 15:44

To: FASI-S Farnborough Airport <fasi-s@farnboroughairport.com>

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Good afternoon,

I would like to slightly change wording in the feedback:

*All design options look good and are aligned with the airport's Statement of Need and Design Principles. Although the options do not directly impact London Luton Airport, we are keen to see Farnborough Airport's progress as quickly as possible to avoid delays in LTMA system-wide and regional cluster changes.*

Many thanks!

Kind regards



Airspace Change Executive  
London Luton Airport  
Percival House, Percival Way  
Luton, LU2 9NU

[W london-luton.co.uk](http://london-luton.co.uk)

---

**From:** [REDACTED]

**Sent:** Tuesday, January 23, 2024 1:45 PM

**To:** FASI-S Farnborough Airport <fasi-s@farnboroughairport.com>

**Subject:** RE: Reminder: Farnborough Airport Airspace Change Engagement - Stage 2 Workshop material - Feedback

Good afternoon,

Please see LLA's feedback below:

*All design options look good and are aligned with the airport's Statement of Need and Design Principles. Although the options do not directly impact London Luton Airport, we are keen to see Farnborough Airport's progress as quickly as possible to avoid delays in LTMA system-wide cluster changes.*

Kind regards,

# EXT: RE: Farnborough Airport Airspace Change Engagement - Stage 2 Workshop material

[Redacted]

Mon 08/01/2024 10:44

To:FASI-S Farnborough Airport <fasi-s@farnboroughairport.com>

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Good morning.

Some feedback from SOU below.

In this process Farnborough need to remove the requirement for some of their departures to work Solent radar, this will reduce the delays incurred to traffic departing Southampton Airport then on the same route. I think the design principles submission document page 34, 5 5.1.1. covers this but in para 5 but this is something to investigate.

Many thanks

[Redacted]

**SOU**  
Southampton  
Airport

ACP Technical Lead  
AGS Airports Ltd

www.southamptonairport.com  
Southampton International Airport Ltd, Wide Lane, Southampton, SO18 2NL

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## EXT: RE: Farnborough Airport Airspace Change Engagement - Stage 2 Workshop material

[Redacted]

Fri 19/01/2024 16:01

To: FASI-S Farnborough Airport <fasi-s@farnboroughairport.com>

[Redacted]

📎 1 attachments (29 KB)

24.01.19 NERL Feedback for Farnborough ACP\_Stage 2.docx;

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon Farnborough,

Please find attached the NERL response to the Farnborough Stage 2 request for feedback.

We would like to thank you for the opportunity to respond. If you require any clarification of the points we have made, please don't hesitate to contact me.

Best regards

[Redacted]



[Redacted]

Airspace Engagement Manager

[Redacted]  
[Redacted]  
[Redacted]

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NATS Internal

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**From:** FASI-S Farnborough Airport <fasi-s@farnboroughairport.com>

**Sent:** 18 December 2023 10:29

**Subject:** Farnborough Airport Airspace Change Engagement - Stage 2 Workshop material



## NERL feedback for Farnborough ACP: Stage 2.

19.01.24

Question asked:

- Do you think our current design options are aligned with our Statement of Need and Design Principles?

NERL response:

NERL agreed that the Farnborough design options were aligned to both the Statement of Need and the Design Principles.

Question asked:

- Are there any changes or additional options you would like us to consider, that we haven't already?

NERL response:

- NERL considers that Farnborough have created a comprehensive set of design options.
- In a number of design options there exists a "low level departure and arrival routes to/from the east for flights to between Farnborough and Biggin Hill". NERL would like to suggest that this is not limited to Biggin Hill and made available to Thames Airports. Furthermore, NERL would like to ask whether Farnborough has considered whether this route might be suitable as a departure route, if it could be accommodated by the Network?

NERL would like to add the following comments:

- Reference to FASI South should be amended as nomenclature has changed.
- Reference to Farnborough Clutch should be changed to 'Wessex Group'.
- Low level contingency holds would be outside of the NERL scope.
- Lateral profiles seem reasonable.
- Improvements to climb profiles will be dependant on climb profiles of routes from adjacent airfields.
- Option 4 (Slide 47) and Option 5 (Slide 50) departure route via Midhurst as drawn, may require additional low-level controlled airspace depending upon departure profiles from adjacent airports.

## NERL feedback for Farnborough ACP: Stage 2.

19.01.24

Question asked:

- Do you think our current design options are aligned with our Statement of Need and Design Principles?

NERL response:

NERL agreed that the Farnborough design options were aligned to both the Statement of Need and the Design Principles.

Question asked:

- Are there any changes or additional options you would like us to consider, that we haven't already?

NERL response:

- NERL considers that Farnborough have created a comprehensive set of design options.
- In a number of design options there exists a "low level departure and arrival routes to/from the east for flights to between Farnborough and Biggin Hill". NERL would like to suggest that this is not limited to Biggin Hill and made available to Thames Airports. Furthermore, NERL would like to ask whether Farnborough has considered whether this route might be suitable as a departure route, if it could be accommodated by the Network?

NERL would like to add the following comments:

- Reference to FASI South should be amended as nomenclature has changed.
- Reference to Farnborough Clutch should be changed to 'Wessex Group'.
- Low level contingency holds would be outside of the NERL scope.
- Lateral profiles seem reasonable.
- Improvements to climb profiles will be dependant on climb profiles of routes from adjacent airfields.
- Option 4 (Slide 47) and Option 5 (Slide 50) departure route via Midhurst as drawn, may require additional low-level controlled airspace depending upon departure profiles from adjacent airports.

## EXT: RE: Farnborough Airport Airspace Change Engagement - Stage 2 Workshop material

Mon 22/01/2024 10:11

To:FASI-S Farnborough Airport <fasi-s@farnboroughairport.com>

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Thanks for your engagement. The presented options are wide ranging and complex. Like many other stakeholders, we are keen to see Farnborough traffic climb as high and as early as possible and descend as late as possible. Continuing with the current situation of Farnborough traffic routing around southern England below 3000' and with an ambition of doubling movements is clearly unacceptable.

The "swathes" do not include dimensions of potentially applicable airspace design. Therefore, we are unable to identify whether they had been correctly evaluated against the relevant Design Principals (DPs), e.g DP's 2, 4c and 5.

While we recognise that the ACP is being developed by the sponsor in line with CAP1616 procedure, the absence of any proposed airspace design at this stage makes it impossible for us to understand the potential impact on our airspace user activities and airfields.

We understand from the briefing and other engagement that the current approach to trying to achieve cohesive and efficient airspace design anywhere in the UK is hampered by the current process where all ANSP's do their own thing for airports that are in competition with each other, and as a result in this case, Farnborough traffic is unable to integrate with London airports traffic resulting in more controlled airspace (and emissions etc) below 7000'.

It would seem obvious that the only option that has the potential to optimise AMS principles is Option 5. However, we understand that Farnborough is 'down the pecking order' when it comes to prioritisation in the LTMA, which does not suggest that ANSPs including NATS are open minded about improving the situation. A top-down solution is needed.

In summary, until we see indicative airspace designs with vertical and horizontal dimensions, we are unable to give a view on whether your current design options are aligned with your Statement of Need and Design Principles.

The Farnborough ACP is little different from others we are engaged in, ie CAP1616 box ticking in nature, complex and almost impossible to understand the impacts.

We hope that is useful.

Kind regards

BGA

## EXT: Farnborough Airport Airspace Change Engagement - Stage 2 Workshop Feedback

[REDACTED]  
Thu 25/01/2024 13:22

To: FASI-S Farnborough Airport <fasi-s@farnboroughairport.com>  
[REDACTED]  
[REDACTED]

📎 1 attachments (150 KB)

Farnborough Airport FASI-S Airspace Change - Stakeholder Engagement Feedback 20240125.pdf;

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear [REDACTED]

Following the Stage 2 Stakeholder Engagement Workshops conducted by Farnborough Airport last month, you wrote to us on 18 December 2023 with a request for feedback to the following two questions:

- *Do you think our current design options are aligned with our Statement of Need and Design Principles?*
- *Are there any changes or additional options you would like us to consider, that we haven't already?*

In answer to the first bullet, we consider that the baseline and initial options presented are (so far) in line with the Statement of Need and the Design Principles defined from Stage 1. As aviation stakeholders, our particular interest is in how Farnborough Airport will demonstrate compliance with Design Principles 4 (improved vertical profiles), 5 (remove dependencies with other ATC units and minimise the impacts on other airspace users) and 7 (make best use of Farnborough's modern aircraft fleet capabilities). We also have a general concern that despite the best endeavours of Farnborough Airport, you may not be able to deliver, or at least may have to compromise your designs due to constraints placed on you by NATS NERL, LHR and LGW airports. This, we see as being common amongst all FASI-S ACPs which is why to some extent we reserve any final judgement given that what Farnborough Airport and General Aviation airspace users would prefer to see, may not be realisable or even achievable. This, I'm afraid is a consequence of constraints from the co-ordination process and where Farnborough sits in the wider Southeast airspace modernisation given both the airfield proximity and vertical restrictions.

Regarding the second bullet, please find attached our detailed set of comments on the material presented at the workshop.

We hope that our comments are of help to you, and we look forward to future engagement on this important airspace development.

Best regards,

[REDACTED]  
On behalf of The Airspace Team  
Southdown Gliding Club Ltd.

[REDACTED] [REDACTED]  
[REDACTED] [REDACTED]



Website: [www.southdowngliding.co.uk](http://www.southdowngliding.co.uk)

**Southdown Gliding Club Ltd**

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25<sup>th</sup> January 2024

Reference: Farnborough Airport FASI-S Airspace Change ACP-2022-038

Subject : CAP 1616 Stage 2 Stakeholder Engagement Feedback

Dear Sirs,

In line with the request for feedback to the baseline and initial options presented at the stakeholder engagement workshops held in December 2023, the Southdown Gliding Club would like to offer the following comments:

**General Comments**

1. The Southdown Gliding Club notes that from Stage 3, the CAP 1616 process will be conducted in accordance with the latest Edition 5.
2. The Southdown Gliding Club note that the current planning application for increased weekend numbers and overall numbers of movements is completely separate to this airspace change. We also note that known and anticipated factors for 2031 have been considered in the baseline scenarios and that the design options address the statement of need and align with the criteria from the design principles for a period of 10-years after implementation of the airspace change proposal. We note that the dimensioning of the airspace design in terms of routes, airspace volumes and classification is predicated on operating procedures delivering a peak movements rate of 26 per hour.

The reason for mentioning the above points is that the Southdown Gliding Club is currently a co-signatory to a Letter of Agreement (LoA) for expeditious crossing of Farnborough airspace - CTA 7 (Class D). As part of the opportunities presented through AMS for re-design of the current routes and procedures, it is our express hope

that our requirement for direct final-glide on cross-country flights from Lasham to Parham once sea-air has penetrated from the South, can be fulfilled without the continued need for the LoA or controlled airspace. We note that one of Farnborough Airport's Design Principles (No. 5) is an *"aim to remove dependencies with adjacent ATC units and minimise the impacts on other airspace users"*. However, as part of this ACP should the current LoA be retained or another offered in its place, we consider that given the stated peak movements rate the ability of Farnborough Airport to service any such future agreement, will be a critical factor. As just mentioned, any form of LoA is undesirable and we would expect to see the current agreement *"designed-out"* of any new airspace structure.

3. The Southdown Gliding club has attended similar Stage 2 engagement workshops with Gatwick Airport who made it very clear that their goals are to reduce the volume of lower-level controlled airspace, significantly improving access for General Aviation. In addition they have stated that the volume of their low-level airspace should be less than that currently in place as a direct result of aircraft climbing faster and descending on a steeper path as both CCO and CDO operations are realised as a direct result of their FASI-S changes.

Notwithstanding climb performance of *"Heavy"* aircraft operating particularly from Heathrow Airport and this linked dependency with Farnborough Airport operations, we would hope that FASI-S changes should enable the possibility of Farnborough Airport to achieve similar goals. In the latest Farnborough FASI-S presentation, the comment was made that *"Farnborough were unlikely to need more airspace than currently in place"*. As a function of the design options appraisal we would encourage Farnborough Airport to be more ambitious with their goals, which should clearly be possible bearing in mind the changes being proposed by their larger neighbours.

4. At this Stage of the airspace change process it is difficult for aviation stakeholders to gauge how the various design options might reflect on required volumes of airspace and their respective levels. This is particularly pertinent given the arbitration that will inevitably have to be undertaken as part of the co-ordination with both the Network operator (NATS NERL) and adjacent airports (LHR, LGW and SOU).

In so far as we can see, the notion of an independent Single Design Entity (SDE) will likely fall outside of the scope and timeframes of this ACP. Despite the positive ambitions expressed by Farnborough Airport through the design options presented at the stakeholder engagement workshop, we feel that it may amount to nothing unless agreed by LHR, LGW and NERL.

## Specific Comments

5. Under Example of Technical Viability - RWY 06 First Turn Departure, point 3 mentions that PANS-OPS does not allow an immediate right turn. This may be the case today, but by 2031 we would expect that ICAO Doc 9905 Required Navigation Performance Authorization Required (RNP AR), Procedure Design Manual will have been amended to provide the necessary criteria supporting RNP AR Departures (DP) as published in ICAO Doc 9613 PBN Manual Fifth Edition. This PBN navigation specification is intended for such early/immediate first turns and given that Farnborough Airport is already considering use of an RNP AR arrival for avoiding Odiham (Illustrative System Option 3 RWY06), such a Specific Flight Operational Approval supporting arrival and approach transitions would likely translate across to cover such departures. It is also worth noting that London Stansted Airport has for a number of years successfully operated RNP 1 departures with first turns at less than 1 NM after DER.

We would also ask Farnborough Airport to consider use of the Advanced RNP (A-RNP) PBN navigation specification (Doc 9613 Fifth edition) which supports arrivals and departure operations at RNP 0.3 design requirements, thereby optimising core GPS navigation performance with current flight management system capabilities. This navigation capability is on the vast majority of modern aircraft and has been since ICAO introduced the A-RNP specification into Doc 9613 over ten years ago. It just requires the vision of an airport to fully exploit it through an airspace implementation. The design criteria is there and the Farnborough Airport aircraft fleet mix capability must be one of the most advanced in the country. Furthermore, A-RNP does not require a Specific Flight Operational Approval and safety assessment under RNP AR rules.

6. Under Technical Viability, mention was made the provision of “Contingency Holds”. Were these airspace structures to require bespoke airspace (for reasons of containment) resulting in an overall increase in Farnborough Airport’s need for controlled airspace, this could be a major problem for the Southdown Gliding Club and our ability to conduct cross-country flights to the West and North of our airfield. As presented, these airspace structures give us cause for concern.

In our view, any “*Contingency Holds*” should be managed within existing controlled airspace or else be located such that our gliders could operate up to FL55 *under* the airspace structure. We would therefore request that further engagement takes place on the location and levels of these “*Contingency Holds*”, which by their very nature would be rarely needed but which could present a major obstacle to our continued use of Class G airspace for cross-country gliding purposes.

7. During the workshop mention was made of the latest CAA Policy for the Design of Controlled Airspace Structures and a containment policy of 2 NM for straight legs and 3 NM on turns. We would remind Farnborough Airport that the 3 NM only applies for fly-by turns. The containment for turns using the Radius to Fix (RF) path terminator is 2 NM. See SARG Policy 126, Annex B, paragraph B3.3.1.
8. Concerning Illustrative System Options, we support Option 4 and indeed any Network Arrivals that move traffic further East, thereby releasing airspace to the West and enabling our previously mentioned final-glide from the Lasham area once sea-air has penetrated from the South.

The Southdown Gliding Club would like to thank Farnborough Airport for the opportunity to attend your Stage 2 Stakeholder Engagement Workshops and provide the above feedback. We certainly appreciate being involved in these discussions given the impact that airspace change has on our business. We trust that the dialogue continues and will result in an airspace design which is truly a win-win for both Farnborough Airport and the Southdown Gliding Club Limited.

Please do not hesitate to contact us should you have any questions or require clarification on the feedback provided.

Yours faithfully,

[Redacted signature]

[Redacted name]

On behalf of The Airspace Team  
Southdown Gliding Club Limited

[Redacted contact information]

[Redacted contact information]



## EXT: Re: Farnborough Airport Airspace Change Engagement - Stage 2 Workshop material

[REDACTED]

Fri 26/01/2024 22:13

To:FASI-S Farnborough Airport <fasi-s@farnboroughairport.com>

📎 1 attachments (120 KB)

20240126\_Farnborough ACP\_Stage 2A\_Lasham stakeholder feedback.pdf;

[REDACTED] appears similar to someone who previously sent you email, but may not be that person. [Learn why this could be a risk](#)

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Dear [REDACTED]

Please find attached the Stage 2A feedback from Lasham Gliding Society.

Very best regards.

[REDACTED]

[REDACTED]

*Chairman*  
Lasham Gliding Society

[REDACTED]

[REDACTED]

## Farnborough Airport

### FASI-S Airspace Change Proposal

#### CAA Reference ACP-2013-07

#### Stage 2 Stakeholder Engagement

#### Lasham Gliding Society ('LGS') – stakeholder response

26 January 2024

### 1. Important context to the Stage 2A outputs

*The following comments set the context against which our specific observations on the contents of the Stage 2 Stakeholder Engagement should be considered.*

In order that a constructive engagement on the Farnborough ACP can take place in a properly informed and meaningful way, it is absolutely critical that all relevant influencing factors are acknowledged, understood and appropriately considered by all stakeholders when considering the stage 2A output.

The Stage 2A Engagement document does not either acknowledge, or beyond that explicitly consider, a number of important factors that will have a clear bearing as to how to consider the options that are being shared as part of phase 2 of the CAP 1616 process.

In this regard, we highlight the omission of the following:

- **Farnborough Post-Implementation Review** – the final outcome of the PIR will have a fundamental bearing on the starting point for any ACP. The results of the PIR have not yet been published, and we would expect the Stage 2A output to caveat clearly its dependency on the conclusions of the PIR.

Indeed, we would expect Farnborough to provide a clear explanation as to how the stage 2A outputs, and the scope and timings of its stage 2 and 3 ACP processes, might have to change depending on the results of the PIR.

LGS input to the PIR highlighted the critical need for a full safety and risk review to be undertaken in the airspace volumes (including class G) adjacent to the Farnborough airspace. *There is no acknowledgement of the need for such a review to be undertaken anywhere in the Stage 2A output. This is a major omission and undermines the rigour required in the redesign of any airspace in the extremely busy and complex area of intense aviation activity that surrounds the current Farnborough airspace.*

- **Lasham Gliding Society Letters of Agreement** – the basis for two Letters of Agreement between LGS, Farnborough and RAF Odiham were agreed by all parties with the CAA several years ago and validated by the NATS' review of the operational procedures necessary to ensure safe operation under the LoAs. Despite agreement being reached, neither LoA has been implemented – and no explanation has been given as to why this matter has not been concluded as agreed. The LoAs are very important to LGS and were a clear requirement placed on Farnborough by the CAA when the original airspace was first granted.

None of the options put forward in the stage 2A outputs references the LoA areas. It is not clear, therefore, the extent to which the options are consistent with the LoAs – or if Farnborough is implying that no such LoAs will exist under the new ACP. A clear statement on this point is required and the stage 2A outputs cannot be considered fit for consideration otherwise.

- **The Farnborough ACP is acknowledged to be an element of a wider set of FASI-S ACPs that will comprise the LTMA component of the Airspace Modernisation Strategy ('AMS')** – as such, many of the coherence and integration issues referenced in the design options will be considered as

part of the LTMA airspace design that will be undertaken under the AMS. This will be a very complex – both technically and in terms of balancing the competing priorities of individual airports ACPs.

It is impossible to know how the options outlined in the Stage 2A output would fare when considered against the design options being considered by, for example, London Heathrow and London Gatwick airports. It might be better for Farnborough, and at the same time lessen the risk of nugatory stakeholder engagement, were Farnborough's initial design options to be presented after taking into account how the main potential conflicts between LTMA airport ACPs (at least those that are relevant to Farnborough) might be resolved? This would have implications for the timings of the Farnborough ACP process and make it more contingent on the progress of the ACPs of the major LTMA airports – but it would ensure that stakeholders were being asked to feedback on options that might have some chance of being potential realities.

- ***Farnborough's intention to change movement numbers/profiles under its planning permission*** – has to be seen as an irrelevant and confusing part of Farnborough's ACP design options. The prospect of an increase in permitted movement levels is a matter that will be decided on separately and, if history is anything to go by, only after a highly contested argument as to the merits of the case that Farnborough puts forward.

Similarly, if history is anything to go by, the actual numbers of aircraft movements out of Farnborough will have to achieve a consistent doubling in current movement numbers to make use of a revised planning permission.

Any ACP has to be grounded in terms of reasonable projections for movement numbers. It has long been recognised that unrealistic, wildly optimistic (if not wonderfully unrealistic) traffic forecasts have been a hallmark of many self-serving ACPs and have often distorted/corrupted the true case for airspace change. To place any significance on a possible increase in permitted movement numbers within the context of this ACP is not sensible given the uncertainty surrounding the likelihood of, the potential timings, as to when it might be relevant.

*LGS recalls clearly that Farnborough stated during the Stage 1 consultation meetings that no change in airspace was required to accommodate future air traffic movement numbers - and that the ACP was not part of an exercise to enable more growth.*

Without the explicit, relevant and appropriate consideration of the above as part of the development of Farnborough's initial options, the degree to which the design options included in the engagement document provide a sensible starting point for engagement and subsequent appraisal has to be fundamentally questioned.

## 2. Comments of Stage 2A output

In the interests of brevity and clarity, we provide our comments in bullet-point form below:

- The options presented under 2A are very broad in nature, involved and complex. There is insufficient information within the document for the proper understanding of the detail profile and/or impacts of a particular option to be established. Far more information, beyond indicative arrows on a vague map, is needed to help identify the pros and cons of each option.

*It is not, therefore, possible to even broadly ascertain how the options rate against the given design principles.*

- No insight has been shared on the impact of the options on transit traffic within, and other traffic that operates in the near adjacent airspace areas outside of, the Farnborough airspace. Given the extremely busy nature of the local airspace, and implications for operational risk factors, this is a major omission.
- There are two assertions contained in the Stage 2A output that we would like further clarification on:
  - Page 16 – we require more detail information before we accept the assertion that Farnborough departures and arrivals are held down by Heathrow departures. In

addition, we would like to know whether or not relatively small changes to potentially conflicting Heathrow departures – e.g. minimum climb gradients of 5%/6% between 1000 and 1700, April to September – might not be easy to achieve and bring benefits such as reduced volumes of controlled airspace.

- Page 21 – surely using predicted peak hourly movements to set the basis for airspace design leads to an extremely inefficient and wasteful use of controlled airspace. If a smaller by default volume of airspace is used to deal with a given and reasonable percentage of peak demand levels, then it may achieve the optimal balance between efficient use of controlled airspace and the small amount of time that some form of ATC restrictions might need to be in place to handle extreme peaks/

### 3. In summary

In short:

Do we think that the current design options are aligned with the statement of needs and design principles? Unfortunately, no. The options:

- Need to be clearly set within the full set of known influencing factors.
- Have to be presented to a greater degree of granular detail to allow for a proper assessment of operational implications and consequential impacts.
- Should be more reliably representative of what Farnborough might need to do under the wider LTMA system construct – rather than be concerned with a design that is centred entirely on Farnborough and which may not survive much engagement with the wider LTMA reconciliation.

Are there any changes of additional options that ought to be considered? We would suggest that the further development of the ACP is done through a mix of both engagement with all relevant stakeholder groups as well as technical working sessions with key aviation stakeholders specifically. If Farnborough is serious about getting the optimal outcome for its ACP then we strongly suggest that greater collaboration is a far more productive way to proceed at a technical level than arms-length engagement.

Lasham Gliding Society

26 January 2024

## EXT: Re: Reminder: Farnborough Airport Airspace Change Engagement - Stage 2 Workshop material

[REDACTED]

Fri 05/01/2024 09:38

To:FASI-S Farnborough Airport <fasi-s@farnboroughairport.com>

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

[REDACTED]

Thank you very much for the reminder and the slide pack again.

One aspect of the information that is missing is a comparison of the altitudes of the current flight paths and the possible new flight paths. It would be very useful to see how the proposed new routes reduce/increase the impact on both general aviation and the general public living under flight paths.

People may be more supportive of a new option if they can see that it is higher than the previous flight path and therefore reduce the noise impact and the restriction on GA airspace.

With kind regards

[REDACTED]

## EXT: Re: Reminder: Farnborough Airport Airspace Change Engagement - Stage 2 Workshop material

Thu 18/01/2024 05:40

To:FASI-S Farnborough Airport <fasi-s@farnboroughairport.com>

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear [REDACTED]

Please find below my feedback on behalf of the British Microlight Aircraft Association and Hampshire Microlight Flying Club

Kind regards  
[REDACTED]

1. Do you think our current design options are aligned with our Statement of Need and Design Principles?

I would disagree that current options are aligned with the Design Principles, specifically (but not limited to) Principle 4(c) - reduction in the volume/complexity of airspace. In the absence of any objective assessment my view is that alignment with other Principles is weak at best, and does not represent significant improvement over the 'as is' scenario.

I think the design options are so constrained by surrounding airspace and operations that they are better described as tinkering within existing airspace design, and do not offer any significant change or modernisation to justify the huge effort and input to the airspace change programme at this stage. If the benefits described from the options presented are, as they seem to be, possible within existing airspace arrangements, then why not implement immediately? For example, during the briefing session I attended, much emphasis was placed on the 'new' low level routes between Farnborough and Biggin Hill. For the amount of traffic this represents (minimal) I would make the comments that a) it was over-emphasised, and b) echoing my views above, why not just get on and implement this change?

Are there any changes or additional options you would like us to consider, that we haven't already?

It is difficult to conduct any meaningful analysis on proposals which clearly represent minimal change in the context of constraints which have not change from adjoining airports, not least Heathrow and Gatwick. My overall view is that this is a work in progress which cannot be completed until the airspace change proposals are clarified from adjoining airports. It is only then that we shall be able to evaluate a meaningful set of additional options.

On 5 Jan 2024, at 8:12, FASI-S Farnborough Airport <fasi-s@farnboroughairport.com> wrote:

## EXT: FW: Farnborough Airport Airspace Change Engagement - Stage 2 Workshop material

[REDACTED]  
Fri 26/01/2024 10:07

To: FASI-S Farnborough Airport <fasi-s@farnboroughairport.com>

Cc: [REDACTED]

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear [REDACTED]

Thank you for the presentation provided and the opportunity to give feedback at this stage.

### **Do you think our current design options are aligned with our Statement of Need and Design Principles?**

*Design Principle 5: Aim to remove dependencies with adjacent ATC units and minimise impacts on other airspace users.* While some options have been discarded due to impact on other nearby airspace users, there are several that appear to have the potential to increase impact on RAF Odiham airspace users and thereby require a dependency or continued letter of agreement between RAF Odiham and Farnborough.

### **Are there any changes or additional options you would like us to consider?**

The Farnborough ACP and anticipated increase to traffic levels will have an impact upon RAF Odiham and MOD Airspace users, however, until further detail is available regarding design options, the extent to which it affects cannot be fully defined. A letter of agreement exists between RAF Odiham and Farnborough detailing the "fair and equitable use" of airspace and dependencies between the two airfields with respect to access and flight procedures. Any increase to controlled airspace is unlikely to be supported by the MOD due to concerns regarding RAF Odiham freedom of manoeuvre, complexity of procedures and associated impact upon airspace access, operational and training volume and the potential for increased reduction in the availability of those procedures which overlap between Odiham and Farnborough. The Farnborough ACP will require an updated letter of agreement and is likely to increase the dependencies between the two agencies.

Kind regards,

[REDACTED]

[REDACTED] Defence Airspace and Air Traffic Management (DAATM) |

Av [REDACTED]  
[REDACTED]

**EXT: RE: EXT: RE: Reminder: Farnborough Airport Airspace Change Engagement - Stage 2 Workshop material**

[REDACTED]

Fri 12/01/2024 08:44

To: FASI-S Farnborough Airport <fasi-s@farnboroughairport.com>

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning [REDACTED]

Thank you for forwarding and including me on the mailing list. What are the expectations regarding an operator's involvement in this process? We have looked at the current documentation and have two observations:

- One of the "Options" proposes an RNP(AR) approach for Runway 06. We need to advise on keeping this to RNP 0.3 on the approach and RNP 1 on the missed approach. Otherwise, the majority of bizjets will not be able to use it.
- Another "Option" looks to provide a radius to fix the transition onto the final approach for Runway 24 (although it doesn't give that much technical detail), so this could cause an issue for those types which are not RF capable (not sure which of our types are still not RF capable).

Can you provide feedback on the above?

Thanks

[REDACTED]

[REDACTED]

Assistant Director of Operations

[REDACTED]

[REDACTED]

[REDACTED]

[netjets.com](http://netjets.com)

---

**From:** FASI-S Farnborough Airport <fasi-s@farnboroughairport.com>

**Sent:** 10 January 2024 08:48

**To:** [REDACTED]

**Subject:** [EXTERNAL] RE: EXT: RE: Reminder: Farnborough Airport Airspace Change Engagement - Stage 2 Workshop material

Good morning [REDACTED]

Thank you for your email and I can confirm that I have now added your details to our stakeholder list and therefore you will receive all comms moving forward.

I will include some information below on the process and where we are at currently;

Farnborough Airport Ltd have commenced a new Airspace Change Proposal (ACP), known as the Farnborough Airport FASI-ACP, to support the Government's wider UK airspace modernisation programme.



To make this change, Farnborough are going through the CAA's airspace change process, known as [CAP1616](#). The process places great importance on engaging with a wide range of stakeholders throughout the required stages, including potentially affected communities.

We have just commenced Stage 2 in the process, to which we are required to engage with stakeholders to seek feedback on a list of "design principles" – a list of high-level criteria that the proposed airspace design should meet. We recently held workshops in which we invited stakeholder to that discussed the potential "design principles" (workshop slides attached) and we are now giving stakeholders until the **26<sup>th</sup> January 2024** to provide feedback on these.

All documentation relating to the Statement of Need and the establishment of the Design Principles referred to in the recent engagement, is available on the CAA Airspace Portal for any stakeholder to view, here is the link; [Airspace change proposal public view \(caa.co.uk\)](#). There are currently 13 documents available, please view the Statement of Need Version 2 and the Design Principles Submission – Main Document – Version 2 to see details regarding these 2 subjects that were part of Stage 1.

The CAA recently produced a guide to the Airspace Modernisation Strategy which may help, here is the link [CAP2547: A guide to the Airspace Modernisation Strategy \(caa.co.uk\)](#) and ACOG, the Airspace Change Organising Group also produce some useful guides [The Process - One Sky One Plan](#).

Hopefully this all makes sense but if you need any further clarification or have any questions then please do not hesitate to say.

Kind Regards,

[REDACTED]  
Aerodrome Service Co-Ordinator  
Farnborough Airport | [REDACTED]  
[www.farnboroughairport.com](http://www.farnboroughairport.com)

***Help us to secure the long-term future of Farnborough Airport and its local region by providing a supportive comment on our planning application on the [Rushmoor Borough Council website](#). One Airport. One Town. Our Future.***



Our privacy notice can be accessed at [www.farnboroughairport.com/legal/privacy-notice](http://www.farnboroughairport.com/legal/privacy-notice)

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**From:** [REDACTED]  
**Sent:** 10 January 2024 08:09  
**To:** FASI-S Farnborough Airport <[fasi-s@farnboroughairport.com](mailto:fasi-s@farnboroughairport.com)>  
**Cc:** [REDACTED]  
**Subject:** EXT: RE: Reminder: Farnborough Airport Airspace Change Engagement - Stage 2 Workshop material

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Team,

My colleague [REDACTED] forwarded your email. Can you place me as the POC for this project and when you have an hour, get me up to speed on the initiative and advise what we an operator can help?

Thanks

[REDACTED]

[REDACTED]

Assistant Director of Operations

[REDACTED]

[REDACTED]

[REDACTED]

[netjets.com](http://netjets.com)

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## EXT: Re: EXT: Re: EXT: Re: EXT: Re: EXT: Re: Reminder; Farnborough Airport Airspace Change - Workshop Invitation

[REDACTED]  
Tue 12/12/2023 12:27

To:FASI-S Farnborough Airport <fasi-s@farnboroughairport.com>

Cc:[REDACTED]

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I attended the meeting on the 11 Dec at Rushmoor BC Offices.

The meeting was very informative with the number of options being discussed.

From an operators point, I think it was option 5, aircraft climbing to 5 or 6000 ft on departure would be our preference.

I appreciate this would require changes to both Heathrow, Gatwick airspace and departure/ arrival procedures.

Modern Jet aircraft can easily climb to these altitudes in short time, and given sensible level off points. The workload in the cockpit will be reduced, and often climbing above the first level of turbulence will provide more comfort to the passengers. Operation of the aircraft will be safer, due to lower departure workload.

I also believe that although the initial noise level may be extended slightly after take-off, the overall noise level will affect less people.

Regards  
[REDACTED]

## EXT: RE: Farnborough Airport Airspace Change Engagement - Stage 2 Workshop material

Mon 15/01/2024 12:25

To:FASI-S Farnborough Airport <fasi-s@farnboroughairport.com>

📎 1 attachments (13 MB)

FAL\_Stage2A\_Engagement\_Final\_1.0.pdf;

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear [REDACTED]

I attended a recent workshop as detailed below, as a representative from Chichester District Council.

Answer to the questions below are provided in **red**.

- Do you think our current design options are aligned with our Statement of Need and Design Principles? **Yes**
- Are there any changes or additional options you would like us to consider, that we haven't already? **No**

Kind regards



[REDACTED]  
Senior Environmental Health Officer  
Environmental Protection  
Chichester District Council

<https://www.chichester.gov.uk>

East Pallant House opening hours: 9am-4pm Monday to Friday



## EXT: RE: Reminder: Farnborough Airport Airspace Change Engagement - Stage 2 Workshop material

Fri 19/01/2024 17:40

To:FASI-S Farnborough Airport <fasi-s@farnboroughairport.com>

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi [REDACTED]

Many thanks for the reminder, my comments are:-

1. General. Could I suggest you ensure the page numbers are visible on sides, it will make it easier for reference. I've used the PDF pages below.
2. #6: Does this mean that the boundaries (transition altitudes, physical airspaces and procedural issues etc) will all now be managed with the ACOG framework, so we can made robust assumptions about what the FRN airspace interfaces with?
3. #7: At practical level will this align at with other airspaces in the ACOG arrangements?
4. #8: How will "Safety " be objectively measured, when comparing options?
  - a. Traffic density is not a good measure as the more accurate routing (using GPS) can enable higher densities, while crossing trajectories will raise higher demands on maintaining schedules.
  - b. A similar question applies to the other "softer" impacts and how they might be robustly assessed.
5. General: the wider adoption of GPS based navigation does increase reliance on such systems and hence vulnerabilities. Will the proposals look to increase resilience, perhaps through local ground based systems (eg. e-Loran).
6. #15: For future presentations, might a 3D image or model be available? This would help understanding.
  - a. This example [Airspace above the South West of the UK \(famousandfaded.com\)](http://famousandfaded.com) the site has some other interesting demonstrations.
7. #19: Presumably the major constraint on routing options is at the highest traffic density (finals and initial climb out) making most options reasonably flexible to higher annual movement rates.
8. #28:
  - a. I note that only the Odiham ATZ (GND-2405ft) is shown but the wider MATZ (GND-3405ft) extends further and has the "bulge" to the west. I appreciate the status of a MATZ is questionable, but should this be included in the constraints or explained in the discussion.
  - b. Apologies, this may have been explained at the meeting, but its not clear why option 4 is not possible, if LHR airspace was raised to 7,000ft as discussed in the introductory sections.
    - i. Is the 2,000ft figure a typographic error or current constraint?
    - ii. The London TMA only comes in at 2,500ft and there is a good gap over Sandhurst.
    - iii. Additionally, with emerging concepts of whole route planning, are their options to push harder for a more integrated flight planning and handover arrangements that would enable the rapid transition though the congested lower airspace and more quickly settled en-route, at altitude.
  - c. If we're looking at fresh ideas and options, is there an argument move away from the simplistic circular TMAs to those more aligned with active/possibly active runways?
  - d. #28+: On many of these slides options are discounted due to the desire to stay within CAS, but it all ideas and options are being considered then these should be a constraint that implies adjusting the CAS boundaries. In other cases, aircraft would simply move into That may not be feasible or possible for all manner of practical reasons. But I suggest these should be outlined.
8. I won't analyse every option in this detail, but it seems that some could be explored more carefully and additional options generated, explained and considered. Additionally there seems to be some differences in understanding and constraints. In particular the options at slide #38 onwards are all interesting but I feel there may be some additional possible options.
9. #37:

- a. Option 4c to reduce CAS volumes and complexity at FRN are welcomed. Being able to give airspace back to other local airfields would be a positive to help offset other effects.
  - b. Option 6b – a clear list of assumed developments would be helpful. There are many misconceptions about what would/could/should be built. Local Authorities usually only comment on those developments with extant planning permission. Other possibilities for development have a range of possibilities, which will be hard to capture and agree.
10. #39:
- a. It seems to me that an additional design driver might be to streamline the arrivals and departures to avoid the crossings that require active deconfliction.
  - b. The “do nothing” options does focus aircraft over the Crondall and Church Crookham areas when heading west on departure. There are routes between Crondall and Farnham that would minimise impact on residents when aircraft are at lower levels. These should be preferred to other routing options.
11. #41: Option 2, Rwy24 (and others): The illustrative charts have moved Odiham and Lasham areas. The suggested holding point altitude will be critical. While possibly practically de-conflicted for altitude (Lasham zone extends to 3618ft MSL, giving you a minimum holding altitude of nearly FL45), proximity warnings would add to pilot workloads.
- a. There is also the Oakhanger warning zone (to 3800ft) for the southern holding area. Its only satellite comms, so shouldn't be an issue.
12. #41+: For all the options, there are no altitudes on the plans to give us a sense of how high aircraft would be under these arrangements. Altitude is a key factor for noise impacts.
13. #49: These are more interesting as they achieve benefit from the wider changes. I would hope that we can get a sense of how likely such changes are and then we can encourage this (through the other political channels that we operate in).

Best Regards



## EXT: Re: Farnborough Airport Airspace Change Engagement - Stage 2 Workshop material

[REDACTED]  
Tue 23/01/2024 12:25

To: FASI-S Farnborough Airport <fasi-s@farnboroughairport.com>

Cc: [REDACTED]

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I am a Waverley Borough Councillor for Hindhead and Beacon Hill ward and also a Churt Parish Councillor. I have the following comments.

The options presented in the slide deck are incredibly difficult to follow. When they were presented to us at the online workshop the presenter used multiple clicks on each slide to walk through the progression of departures and arrivals. They accompanied this with a commentary/explanation. The hard copy of the slides we have been given cannot and does not provide the detail to make informed judgements. The slides are now just a meaningless jumble of coloured arrows with inadequate explanations. At the very least a recording of the presentation should have been made available but even this has not been done.

The current design options are also flawed as they are derived from a baseline that ignores any potential changes from the Post Implementation Review. No options should be finalised until the PIR is completed and existing noise and pollution in villages such as Beacon Hill and Churt are properly measured and evaluated.

Design principle 1 states an airspace change *“Must be as safe or safer than today for all stakeholders that are affected by the airspace change”* and goes on to say you will set out the methodology for assessing safety in Stage 2. This is Stage 2 and nowhere is this methodology explained. Without it none of the options can be properly assessed and this is a major failing.

The first turn departure options appear to show routes from both runways being directed towards the area south of Farnham. This seems incompatible with Design principle 6 which states that options should *“minimise population numbers newly overflown”* and *“avoid overflying the same communities with multiple routes to & from Farnborough Airport”*.

The contingency Hold options indicate a stack south of Farnham and we are concerned that the strategy of *“reduction in tactical intervention”* and an increase in flights will result in these holding areas having more and more aircraft circling in them at low height. This seems incompatible with Design principle 6 as stated above.

Kind regards,

[REDACTED]

[REDACTED]

Waverley Borough Council - Hindhead & Beacon Hill Ward

[REDACTED]

EXT: From Rt Hon [REDACTED] ([REDACTED]) URGENT F.A.O. [REDACTED]

[REDACTED]

Tue 23/01/2024 17:20

To:FASI-S Farnborough Airport <fasi-s@farnboroughairport.com>

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear [REDACTED]

Thank you for your correspondence and all you have done to assist with communicating the proposals of Farnborough Airport.

Please find below my observations and possible changes for your consideration.

1. Operations restricted to more modern aircraft, using green aviation fuel.
2. AONB / tranquillity / habitats should be avoided.
3. Holding space not below 7,000 ft. where possible.
4. Where increase in flight numbers and operating times is proposed, consider an extension of compensation for all those areas impacted. And that, compensation should be used appropriately through liaison with Councils and communities.

I would like to take this opportunity to reiterate that communication is key – It's been encouraging that Farnborough Airport recognises this. I politely request that you continue in this vein, and that you take residents with you rather than they are left feeling they haven't had their voices heard.

In addition, please could you reconfirm you have decided not to pursue any change to the current non-weekend operating times; that you revised annual non-weekend flights – (limits have been proposed to ensure growth is phased over time), that you have new measures, 'to mitigate and reduce the potential for increased aircraft noise'; and that you have planned for additional funding to the Airport's community funding programme, and also for 'the potential for a broader remit in terms of local community initiatives'.

In addition, that you have proposed additional monitoring and reporting on emissions reduction and air quality with aims to adopt 100% Sustainable Aviation Fuel (SAF).

I sincerely hope this response is helpful, and I look forward to receiving confirmation on the points I have asked you to reconfirm above.

Best wishes

[REDACTED]

-----

[REDACTED]

**Member of Parliament for South West Surrey**

[REDACTED]



## EXT: Farnborough Airport Airspace Change Engagement [UNC]

[REDACTED]  
Fri 26/01/2024 10:48

To:FASI-S Farnborough Airport <fasi-s@farnboroughairport.com>  
[REDACTED]  
[REDACTED]

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear [REDACTED]

Thank you for your consultation on the options for the air space changes and the opportunity to comment on behalf of Guildford Borough Council.

In response to your questions below.

Do you think our current design options are aligned with our Statement of Need and Design Principles?

**We agree that you have covered a multitude of options and anticipate that the evaluation exercise will have alignment with the principles you are striving to achieve. The economic costs and benefits should be weighted to promote improvements in environmental factors and to address noise and air quality impacts.**

**We also note that localities likely to be affected in Guildford Borough's area are Ash, Pirbright and Worplesdon. Pirbright includes the danger areas under military control and therefore flying is restricted. If these areas ceased to be so, would they be utilised?**

Are there any changes or additional options you would like us to consider, that we haven't already?

**The expansion of Farnborough airport and this process cannot be dealt with in isolation. Are there are assumptions that you have made regarding the potential increase of flights ?**

Please can you keep [REDACTED] our Member representative and me updated on any progress and assessments.

Kind regards

[REDACTED]  
**Environmental Protection Lead**  
**Environment and Regulatory Services**  
**Guildford Borough Council**  
**Millmead House, Millmead, Guildford, Surrey, GU2 4BB**  
[REDACTED]

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## EXT: Re: Reminder: Farnborough Airport Airspace Change Engagement - Stage 2 Workshop material

[REDACTED]  
Fri 26/01/2024 15:19

To:FASI-S Farnborough Airport <fasi-s@farnboroughairport.com>

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear [REDACTED]

Regarding take-offs from RWY24, then the earliest turn to the south (labelled 5 on slide 59) would be most beneficial from a noise abatement stand-point for Church Crookham residents.

Regarding slide 67, a hold pattern directly over populated areas should avoided (option 2), holding around Lasham (option 3) will not be popular either.

Slide 68 :- currently having arrivals from the north flying route 1 (today's procedure) does doubly impact overflown residents in Church Crookham, so if this can be changed for a different option that would seem fairer.

Best regards,

[REDACTED]

## **Mole Valley District Council – Farnborough Airport Airspace Change Engagement - Stage 2 (January 2024)**

### **1.0 Introduction**

- 1.1 Mole Valley District Council (MVDC, or ‘the Council’) acknowledges the Farnborough Airport (‘the Airport’) consultation on Stage 2 of the CAP1616 process on a new airspace change proposal to modernise the Airports airspace. The Council would like to make the following comments and raise relevant concerns, where they arise.
- 1.2 This response has been compiled on reflection of the information provided for the consultation and cognisant of the Airport’s recent application to Rushmoor Borough Council to increase the annual number of flights by around 20,000.

### **2.0 MVDC Position & Comments**

- 2.1 Airspace over Mole Valley is already notably populated with air traffic from nearby Gatwick and also Heathrow and Stanstead, at the higher altitudes. Air traffic at lower altitudes also exists most commonly, but not exclusively, from Redhill Aerodrome. These regular air traffic movements already generate negative sound and environmental outputs, impacting on the quality of life for the local communities. As such, the Council is opposed to any airspace changes that will exacerbate existing issues and further burden residents, especially where there is no effective mitigation proposed and delivered.
- 2.2 Furthermore, the Council does not consider that the proposed options being consulted upon are compliant with the final design principles of the Airports change programme submitted to the CAA in 2023. The Council’s view on options and design principles relevant to MV are set out below.

### **3.0 Design Principles**

#### ***Final Design Principle 6h: Avoid overflying the same communities with Farnborough’s routes and those routes to & from other airports below 7000ft***

- 3.1 As the Airport will be aware Heathrow and Gatwick Airport’s, amongst others in the FASI-South areas, are also undergoing airspace change which already places great pressure on the skies over Surrey and beyond. Furthermore, Gatwick Airport Limited (GAL) are currently at the pre-examination stage for a Development Consent Order (DCO) to expand its operations by utilising the emergency runway for additional flights. MVDC is a host authority for the DCO and continues to raise concerns regarding the increase in flights, noise, air quality and the wider environmental impacts of the proposals.
- 3.2 While it is acknowledged that the Farnborough airspace change programme is a requirement under CAP1616, it is not considered that the scale of flight increase and bids for airspace has been properly accounted for in determining options and is contrary to design principle 6(h). It is considered that the options set out at Table 1, would contribute to the levels of

overhead movements - cumulatively and negatively affecting communities of the district and wider Surrey. Any options that would increase air traffic to the east of Farnborough Airport, should be discounted and are considered to be inappropriate and harmful.

***Final Design Principle 7: Make best use of Farnborough's modern aircraft fleet capabilities***

- 3.3 The Council understands the intentions of the CAP1616 process and notes the encouragement design principles show for modern aircraft adaptations, yet remains unconvinced that new technologies and fuels will be implemented widely enough, or quickly enough, to reduce noise levels, emission or climate impacts. As such, any option which notably hinges on design principles relating to the improvement of technologies and any assumed positive outcomes of those technologies, should be given minimal weight. Until significant improvements in the industry can be demonstrated and the environmental impacts to air travel realised, any increase to flights over the district will be considered inappropriate.

***Surrey Hills National Landscape<sup>1</sup>***

- 3.4 MVDC wish to raise concerns that the relevance of the Surrey Hills National Landscape has not been properly considered when determining the range of options proposed.
- 3.5 While the Airport has previously recognised Air Navigation Guidance (2017) which states that “where practicable, it is desirable that airspace routes below 7,000 feet should seek to avoid flying over Areas of Outstanding Natural Beauty (AONB) and National Parks”. Previous engagement workshops with the Airport, have explored and recognised the importance of avoiding the overflight of National Landscapes more directly. The Council is aware that in the formation of the design principles comments on the significance of the Surrey Hills were raised by both Surrey County Council and that the Surrey Hills Unit suggested re-wording a principle to add: “avoid disturbing the tranquillity of an AONB”. However, this was not carried forward and no formal and specific design principle was carried forward into the final list.
- 3.6 The Airport is reminded that the Surrey Hills is a significant area of land to the east of the airport, stretching from Guildford across Surrey to the Kent border near Westerham and as far north as Coulsdon, on the greater London boundary. The Airport should already be aware that Natural England is advanced in the process of reviewing the Surrey Hills National Landscape boundaries and in January 2023 commenced an extensive consultation on a significant boundary expansion, proposing new boundaries amounting to a potential increase of more than 18%. While it is recognised that these boundary amendments have yet to be considered by the Secretary of State and adopted, they do present material information that should be considered when assessing any and all options which would result in flightpaths arriving and departing in an easterly direction of the airport, flying over the Surrey Hills. However, a number of the options being consulted upon would still result in overflight and at low altitudes for some distance, impacting on the tranquillity of the Surrey

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<sup>1</sup> Formerly Surrey Hills Area of Outstanding Natural Beauty (AONB)

Hills which is central to the role of all national landscapes and therefore the communities within it.

3.7 The options highlighted within the consultation and as set out in the table below are considered by the Council to conflict not just with the Air Transport Navigation guidance (2017), but also relevant final design principles:

| Route Option                                 | Option No                                                                                                                                                                      | MVDC Position                                                                                                                                                                                                                                               |
|----------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| RWY 06 First turn departure options          | 5. East between Woking and Guildford. Possible to stay inside CAS but will depend on Gatwick and Heathrow's options. Level flight at 3000ft for significant distance expected. | Disagree –<br><br>Design Principles conflict:<br><br>6h) avoid overflying the same communities with Farnborough's routes and those routes to & from other airports below 7000ft<br><br>7) Make best use of Farnborough's modern aircraft fleet capabilities |
| Outer contingency hold options (7000ft+)     | 3. Not viable due proximity to Gatwick                                                                                                                                         | Agree – this is not considered to be a viable option and should be discounted.                                                                                                                                                                              |
| Network arrival route options from the north | 6. From the east between Heathrow and Gatwick at low altitude                                                                                                                  | Disagree –<br><br>Design Principles conflict:<br><br>6h) avoid overflying the same communities with Farnborough's routes and those routes to & from other airports below 7000ft<br><br>7) Make best use of Farnborough's modern aircraft fleet capabilities |
| Network arrival route options from the south | 3. Direct. Not viable due proximity to Gatwick                                                                                                                                 | Agree – this is not considered to be a viable option and should be discounted.                                                                                                                                                                              |
| Network departure route options to the south | 4. Godalming-Billingshurst. Not viable due proximity to Gatwick                                                                                                                | Agree – this is not considered to be a viable option and should be discounted.                                                                                                                                                                              |
| Network departure route options to the south | 5. East between Heathrow and Gatwick at low altitude                                                                                                                           | Disagree –<br><br>Design Principles conflict:<br><br>6h) avoid overflying the same communities with Farnborough's routes and those routes to & from other airports below 7000ft<br><br>7) Make best use of Farnborough's modern aircraft fleet capabilities |


## 4.0 Conclusion

4.1 In summary, the Council understands that the Airport is carrying out the required CAP1616 process, but are unable to support any option that would result in an increase in flight movements which would result in any negative environmental impact to the east of Farnborough Airport and the communities of Mole Valley.

## EXT: Farnborough Noise Group response

[REDACTED]  
Fri 26/01/2024 10:49

To:FASI-S Farnborough Airport <fasi-s@farnboroughairport.com>

 1 attachments (243 KB)

FNG review document Jan 2024 Final.pdf;

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Regards,

Farnborough Noise Group

## **Farnborough Noise Group – Consultation response – January 2024)**

### **Farnborough Airport FASI-S ACP. Stage 2 Stakeholder Engagement Baseline Scenarios & Comprehensive List of Options**

|                            |               |
|----------------------------|---------------|
| <b>Overarching comment</b> | <b>Page 1</b> |
| <b>Summary Points</b>      | <b>Page 2</b> |
| <b>Detailed Review</b>     | <b>Page 5</b> |

#### **Overarching Comment**

Farnborough Noise Group (FNG) has an important role to play as it provides factual and impartial information to the public, a large number of councils and MPs. There is no other group with the level of technical knowledge of changes at Farnborough Airport and the way they will impact the community. Despite this, it is clear that FAL does not want to engage with FNG and does not answer questions, but it does not have that choice. It is required to do so. It was evident from the FASI-S consultation meeting that there are a considerable number of points and clarifications that need to be addressed before a meaningful discussion can occur regarding FASI-S. If FAL is not going to have this discussion, it is not applying the Gunning Principles and the consultation is therefore not meaningful or valid. The public have already experienced this in the Farnborough Airspace Change Proposal (ACP).

The fact that FAL does not recognise its responsibility to resolve issues relating to airport's operations and thinks it is the public's responsibility to do this beggars belief (e.g. noise data not being collected in the PIR when the CEO of the CAA committed to do so to MPs, and the public expected to resolve this). Nor does FAL, CAA, DfT and RBC bouncing FNG around for months do anything for their credibility or the public's faith in these organisations, or due process.

While FAL persists in wanting to use metrics that support its narrative, such as measuring emissions per tonne of aircraft flown to hide the inefficiencies of private jet travel rather than emissions per passenger mile that are an industry standard (how would that work comparing the carbon footprint of train travel by measuring the weight of the train rather than the number of passengers?), people will just not trust what FAL says.

Given the potential impact that airspace changes might have on the quality of people's lives, the value of their properties and the health of their families, these are not issues that will just go away if ignored. FNG has repeatedly requested engagement and proper dialogue with FAL. We urge you to take up this offer as the alternative is a legal one.

This stage of the process is the "*Baseline scenarios & Comprehensive List of Options*". However:

- There is no baseline as basic information such as noise and emissions have not been measured so it is not clear what the baseline is
- The list of options is not comprehensive and the outcome from this stage appears to be a foregone conclusion (there is only one option – the current unapproved airspace change and an additional route to Biggin Hill).

## Summary Points

The CAA's Airspace Modernisation Strategy (AMS) is technically complex and requires a good understanding of aviation procedures to interpret it. However, the main considerations just require common sense.

The AMS aims to increase the capacity of flights in the UK. This will result in greater emissions that will breach the law (Climate Change Act 2008). The aviation industry is pinning its hopes on the availability of low emission fuels and electric/hydrogen powered aircraft – none of which are commercially viable and will not be available to any scale in the next twenty years at least. This is a view expressed by many authoritative and independent bodies such as The Royal Society<sup>1</sup> and expressed by government parliamentary committees<sup>2</sup>. It is also a view stated by the government's Climate Change Committee that concludes there should be no expansion in aviation until emissions from it have started to reduce<sup>3</sup>.

We know that the number of flights has to be reduced to meet climate change (because climate change will decide for us if we don't) so the reality is that this AMS exercise should be stopped and it should be re-started on the basis of designing more efficient use of airspace with half the number of flight operations, not double. Unless the UK were to abandon net zero (in which case nothing really matters anymore, including this proposal), AMS will never see the light of day as it will be caught up in hugely expensive legal challenges for decades, as seen with Heathrow's proposed third runway.

FAL's contribution to the AMS is via the FASI-S procedure. The main issue with FAL's contribution is that yet again it only considers the impact of flightpath change on FAL aircraft but the changes to flightpaths affect all aircraft and it is all aircraft that the public are impacted by. There are more General Aviation aircraft (helicopters, light aircraft, military aircraft, etc) than there are commercial aircraft and private jets. Many of these are older, much noisier and flying lower so have a much greater impact on noise disturbance to people on the ground. Yet they aren't even considered in the FASI-S proposal. This is all very convenient and a great way to under-represent the situation. The result is that the consultation should not be seen as an impartial and comprehensive evaluation – because it isn't.

The CAA states the objective of the AMS as being *“to deliver quicker, quieter and cleaner journeys and more capacity for the benefit of those who use and are affected by UK airspace”*. However, airspace is for everyone – not just the aviation industry. The desires of the aviation industry must be balanced with the needs of everyone. This includes people who do not fly, nature/wildlife and the environment. It also needs to be balanced with the harm caused by increased flights such as GHG emissions, atmospheric and noise pollution. There is substantial scientific evidence linking aviation pollution and noise to deaths and the case of Ella Kissi-Debrah shows that these cannot be ignored.

There are fundamental problems with the objectives that have been set for FASI-S and as long as the objective are wrong, the conclusions will be wrong:

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<sup>1</sup> <https://royalsociety.org/-/media/policy/projects/net-zero-aviation/net-zero-aviation-fuels-policy-briefing.pdf>

<sup>2</sup> <https://committees.parliament.uk/committee/62/environmental-audit-committee/news/199110/including-aviation-emissions-in-carbon-budgets-new-technologies-and-zero-carbon-aircraft-eac-offers-verdict-to-tackle-emissions-in-aviation/>

<sup>3</sup> <https://www.theccc.org.uk/publication/2023-progress-report-to-parliament/>



- 1) **Quicker journeys** rely on going faster (using more fuel and therefore emissions) or flying a more direct route (over areas that should be less overflown such as protected environments and rural areas). In the future, aircraft must fly slower to use less fuel.
- 2) **Quieter journeys** are generally not achievable unless aircraft fly higher which would be a desirable outcome from any change in airspace. New aircraft are generally as noise optimised as they can be but a very large number of aircraft operating are decades old and, short of banning them, the noise they generate will not change. Doubling the number of aircraft (even new ones) will result in more noise regardless of each journey being quieter.
- 3) **Cleaner journeys** require lower emission aircraft powered by new types of engine (electric/hydrogen) that are not available now and will not be available at scale in the next twenty to thirty years<sup>4</sup>.
- 4) The way to achieve the objectives of the AMS for the benefit of all stakeholders is not to **increase capacity**, it is to fly less, and that requires a different airspace design to that proposed in FASI-S.

The south east is already jam-packed with airports and there is hardly any airspace that isn't restricted. It is crazy to try and ram in more controlled airspace for private jets when there are only a few thousand ultra-wealthy people a year using them (we estimate 2,000). Where is the balance of needs in that? Private jets have been pushed out of commercial airports because the airports made more money using the capacity for commercial flights. Maybe the ultra-wealthy private jet users should pay more for the privilege of jetting off for a weekend of skiing rather than finding cheaper locations to operate from and destroying what quiet areas we have left.

Where FNG does agree with the CAA is that the current airspace is a poor design as it has been cobbled together over time which has resulted in many conflicts and operational challenges. There is no doubt that re-designing airspace is difficult but necessary to meet the objectives of all stakeholders. Technology can help with this but not by increasing capacity. It can allow the noise disturbance to be spread and for these new flightpaths to be safer. It also allows the CAA to track and monitor aircraft that are not complying with aviation regulations – something the CAA expects the general public to monitor and report.

There are a number of key points to highlight with FAL's FASI-S proposal. There are more detailed points covered later in this document.

#### Point 1:

Areas such as National Parks/AONB are supposed to be protected from aviation noise under Air Navigation Guidance 2017. However, the design principles adopted by the CAA in FASI-S (and the FAL ACP previously) are in direct contradiction to the guidance as the intention is to put more flightpaths over rural areas. The design principles do not recognise that rural areas have much lower ambient noise levels than urban areas and have populations who have chosen to live in rural areas because they are quiet, so the disturbance and health impacts caused by aircraft noise is far greater than in urban areas.

#### Point 2:

The CAA is promoting Performance Based Navigation (PBN) where aircraft fly using GPS navigation along exactly the same tracks. There are consequences from this. First, it means that the CAA can fit in more flightpaths, thus increasing capacity. Second, it means that anyone under a flightpath, or multiple flightpaths, is under a "noise sewer" (CAA terminology) as flights are highly concentrated. Heathrow and Gatwick are planning for 2 million movements a year. That is an absolutely staggering number of flights and will result in constant aircraft noise all day and most of the night for large

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<sup>4</sup> <https://stay-grounded.org/greenwashing/>

areas of the south east of England, some areas of which are not currently overflowed. Apart from the health impact of such noise, the financial impact is huge. We estimate that FAL's proposed expansion of flights at Farnborough would reduce property values in the local area by at least £2.5bn. This far outweighs any economic benefits that are suggested in the Need Case for expansion. Expansion of capacity under FASI-S will have a much bigger impact on property values across a much larger area.

Point 3:

The design principles state the AMS "*Shall not constrain the ability to meet forecast demand for Farnborough Airport*". FAL has already stated in writing that it has capacity for 100,000 movements (it currently has a licence for 50,000 movements and it operating at 32,000 movements a year). Changes in airspace within FASI-S will not have any bearing on FAL's operational capacity now or in the future.

Point 4:

Design Principle 4b states the AMS shall enable "*a reduction in CO2 emissions per flight from Farnborough aircraft*". Emissions from Farnborough Airport's flights are 30 – 40 times the emissions of an equivalent commercial flight (per passenger mile) because 40% of flights are empty and on average there are only 2.5 passengers per plane. FAL has submitted a planning application to increase the size of aircraft it wants to operate. If FAL wants to achieve a reduction in emissions per flight, it should operate smaller aircraft, reduce the number of empty flights and cease operating leisure flights that it does not have a licence for.

Point 5:

Design Principle 4d states a "*reduction in the reliance on tactical intervention*". The provisional change in airspace implemented in 2020 was supposed to result in aircraft flying defined flightpaths with less input from air traffic control (NATS). This was projected as one of the main benefits of the ACP adoption. A significant number (20 – 30%) of flights do not follow the flightpaths prescribed in the ACP because pilots are given the choice to fly the routes they want to in controlled airspace. If pilots are not instructed what height they should fly at, they will fly at heights and flightpaths they choose. Often these are at 1,000ft (and sometimes below), causing more noise than predicted.

Point 6:

Design Principle 6b states "*minimise population numbers newly overflowed*". However, Farnborough Airport's ACP (that has not yet been adopted) resulted in a significant number of people "*newly overflowed*", which is one of the reasons why there have been so many complaints and objections. FASI-S should therefore include these people as "*newly overflowed*" as they chose to live in quiet rural areas that were not overflowed when the ACP or FASI-S was started. Furthermore, the CAA persistently selects wording that suits its objectives and "*minimising*" means nothing as it is entirely subjective and not enforceable.

Point 7:

Design Principle 6c states "*avoid overflying the same communities with multiple routes to & from Farnborough Airport*". The FASI-S consultation meeting on 5<sup>th</sup> December 2023 went to great lengths to explain that the flightpaths that have been implemented in the current (unapproved) ACP are the only viable options and will remain as they are in the FASI-S proposal. These flightpaths result in the same people being constantly overflowed.

Point 8:

Design Principle 6d states "*avoid overflying the same communities with Farnborough's routes and those routes to & from other airports below 7000ft*". This is a valid objective but most of the

disruptive flights to/from Heathrow, Gatwick, Southampton, Luton, etc are operating above 7,000ft and still cause noise disturbance at that altitude. In fact, in rural areas where ambient noise is low, aircraft can easily be heard indoors at 35,000ft. If all noise was included, rather than just Farnborough aircraft under 7,000ft, it is likely that the current situation would be above the “harm” level. On average, aircraft can be heard for 51 minutes in every hour during the day in rural areas if all aircraft are included. The design does not to include the large number of General Aviation aircraft using the same flightpaths to Fairoaks and Blackbushe that are overflying people already overflown by FAL aircraft on the new flightpaths.

#### Point 9

Throughout the CAA’s documentation and the FASI-S documentation, altitudes are used. Altitude is measured as feet above sea level. Conversely, height is measured as feet above the ground, which is how people actually experience aircraft flying over them. Because we live in a county that is above sea level and has hills, the data provided in the consultations is misleading as aircraft are actually much closer to people on the ground than the data suggests when using altitude. Therefore, suggesting aircraft don’t make significant noise at an altitude of 7,000ft when the ground height varies significantly is misleading.

#### **Detailed Review**

There are several more detailed points to make from the consultation material:

##### Stage 1 Recap – Page 8:

FAL’s Needs Statement assumes its ACP has met its objectives which it has not. Nor can it be assumed that the PIR has been completed when it is six months overdue. The 2020 ACP and the associated PIR are based on a fixed 10-year flight plan (As stated in PIR Data Request, Traffic Figures, Section C *“Reconfirmation that there have been no factors that would cause a material change to the traffic forecasts provided in support of the original proposal, i.e. that the original forecasts are still reasonable”*). FAL has proposed a new 10-year flight plan forecast by submitting a planning application for expansion. Either the ACP is now invalidated or the planning application is not valid. The two are mutually exclusive.

FAL’s Needs Statement says FASI-S will *“create the capacity for efficient growth, appropriately manage the adverse effects of aircraft noise and reduce CO2 emissions.”* These are false statements as capacity increases are a planning decision and not related to airspace changes, as the CAA repeatedly informs us. The number of noise complaints and emissions will increase as a result of FASI-S. It is not possible to increase the number of flights and reduce emissions. FAL’s current planning application for expansion results in the airport’s Scope 3 emissions increasing from the current 200,000 tonnes CO2/year to over 1m tonnes CO2/year.

##### Stage 1 Recap – Page 9

The first point says that the methodology for assessing Safety will be set out in Stage 2. This document is Stage 2 are there is no Safety Methodology. The design principle issues have been covered earlier in this response.

The Design Principles point 2 states they must accord with *“a) the CAA’s published airspace modernisation strategy (CAP1711) and any current or future plans associated with it, and b) Air Navigation Guidance 2017 & other relevant policy and legislations”*. However, repeated questions seeking clarification have been ignored.

Point 3 states the design *"Shall not constrain the ability to meet forecast demand for Farnborough Airport"*. However, the current design has previously been stated as supporting 100,000 movements a year which is beyond the airport's new expansion proposals.

Point 4 states the design should accord with *"Improve vertical profiles compared to the baseline published SID/STAR levels, to enable"*:

- a) *"a reduction in population numbers affected by noise"*

How can this be achieved if no noise measurements have been taken to provide a baseline and what definition of noise is being used?

- b) *"a reduction in CO2 emissions per flight from Farnborough aircraft"*.

The airport is proposing a significant increase in the number of larger aircraft which contradicts this design principle. There is also an inconsistency as the FASI-S covers all aircraft yet the discussion only considers Farnborough aircraft.

- c) *"a reduction in the volume and where possible, complexity of Farnborough Airport's CAS"*.

This just means increased concentration of aircraft noise over fewer people or a reduction in just one flight. The use of terminology like *"where possible"* just gives the CAA the option of ignoring these concerns. In a design process such as this, *"must"* should be used not *"where possible"*.

- d) *"a reduction in the reliance on tactical intervention"*.

This was an anticipated outcome of the 2020 ACP. So it didn't work..... so why hasn't that been picked up in the PIR? Reducing *"tactical intervention"* assumes that pilots will follow the agreed flightpaths and heights to minimise noise disturbance and ensure safety. But they don't as is currently the case and confirmed by the large number of complaint responses from FAL saying pilots were choosing their flightpath or delaying arrival due to congestion caused by other FAL arriving and departing aircraft.

Point 6 states *"Where lateral changes to existing tracks are required to achieve improved environmental and operational performance, options should"*:

- a) is a contradiction of the 2020 ACP design principles where flight miles were increased to reduce noise disruption. Now it seems flight miles will reduce at the expense of noise.
- b) aims to *"minimise population numbers newly overflowed"*. First, the number of people newly overflowed in the 2020 ACP should be included as they were not previously overflowed and second, the term *"minimise"* is subjective. 500,000 people newly overflowed could meet this criterion if it is better than 500,001 people being overflowed.
- c) Aims to *"avoid overflying the same communities with multiple routes to & from Farnborough Airport"* but a new departure route and holding stack is proposed over the new flightpaths introduced in the 2020 ACP that have severely impacted specific areas that were not previously overflowed south of Farnborough.

Point 7 states *"Make best use of Farnborough's modern aircraft fleet capabilities"*. Most private jets can climb much faster than commercial aircraft and steeper departures were designed into CAP1678

for the 2020 ACP to reduce noise impact. For example, on an 06 (easterly) departure, aircraft should be at 4,000ft as they pass over the A31. 90% of aircraft do not achieve this so the “*modern aircraft fleet capabilities*” are not being used now so what will be different in the future?

#### PIR – Page 13

FASI-S has assumed that the FAL PIR will be concluded and any changes can be amended in Stage 3. There was no measurement of noise in the ACP or the PIR, despite it being a requirement to do so and despite it being a commitment by the CEO of the CAA (Richard Moriarty at the time) to MPs. Noise measurements will be required over a period of time and this will result in FAL missing the Stage 3 deadline and dropping out of the FASI-S process.

#### Pages 14 - 18

It is not clear what these pages intend to show.

#### Air Traffic Movements - Page 20

This data only includes the impact of FAL aircraft. It does not include the impact on commercial aircraft below 7,000ft or GA. It is therefore not complete.

#### Air Traffic Movements - Page 21

FAL movements peak at 186 movements a day and 23 an hour. However, there are no restrictions on the number of flights by hour or day. A restriction should be applied to limit the number of flights per hour (10/hr at weekends and 15/hr on weekdays) or day (100/day at weekends and 150/day on weekdays) and FAL should learn to operate within these limits. The needs of the public can then be met rather than just the needs of passengers and FAL shareholders.

#### Noise Footprint - Page 22

This data is invalid because no baseline noise measurements have been taken and because the projected implementation of lower noise aircraft (such as electric aircraft in P20) is not feasible.

#### Noise Footprint - Pages 23 - 25

These noise contours are only relevant for FAL aircraft but many more aircraft use the airspace. The contours should be provided using all aircraft (GA, commercial, diplomatic, Lasham repairs, military, etc). The noise footprint should also include all other sources of noise (Farnborough airport ground noise, community, ground transport, industrial, etc) as it is all noise that impacts people and causes harm. Properly measuring all noise would show a considerably different noise envelope.

#### Scenario Evaluation - Pages 28 - 33

These pages are not a reasonable set of options for consideration. They have been pre-selected to support the conclusion. Options such as banning GA aircraft from under controlled airspace to reduce the total noise load on people underneath flightpaths has not been considered.

The ideas of putting in a flightpaths between Biggin Hill and Farnborough just to move private jets around for the convenience of a couple of thousand people is ludicrous.

#### Contingency Hold Options – Page 34

One of the objectives of the 2020 ACP was to provide more assurance of flights (reducing diversions and circling from avoiding other aircraft). However, there is still a considerable amount of circling because aircraft arrive at the same time and are not managed en-route. This will get worse with the strategy of “*reduction in tactical intervention*” and an increase in flights will result in more circling to provide landing separation. Holding areas are known to cause significant disruption with many aircraft circling over the same people repeatedly at low height (e.g. Luton Airport’s new stacking

arrangements - [www.bbc.com/news/uk-england-cambridgeshire-65188221](http://www.bbc.com/news/uk-england-cambridgeshire-65188221)). Two of the proposed stacks are south of Farnham – exactly where there are the most complaints from the public as a result of the ACP flightpaths being put over them.

#### Options – Pages 39 – 51

These diagrams are very hard to follow. In P39, it is of no concern that ATC intervention may be needed. That is a cost of operating aircraft and such cost is miniscule compared to the harm and disturbance caused to the public. Nor should there be any holding stack close to the airport. Aircraft should be better managed and managed en-route to avoid the need to stack. That is what the technology allows.

Because the flight information is not complete, and the consequential changes to GA have not been included, it is not possible to offer opinions on these (and any other) proposals. There needs to be proper and complete discussion with FNG to cover these issues. If this is not done, the process will fail the Gunning Principles which state consultations should ensure "*sufficient information to give intelligent consideration*" and "*information provided must relate to the consultation and must be available, accessible, and easily interpretable for consultees to provide an informed response*".

## EXT: Farnborough Airport FASI-S ACP Stage 2 Stakeholder Feedback

[REDACTED]  
Tue 09/01/2024 11:58

To:FASI-S Farnborough Airport <fasi-s@farnboroughairport.com>;FASI-S Farnborough Airport <fasi-s@farnboroughairport.com>

Cc: [REDACTED]

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

**I write as the Surrey Heath Borough Councillor for Mytchett & Deepcut and on behalf of the Mytchett, Frimley Green & Deepcut Residents Society. I do not write on behalf of Surrey Heath Borough Council.**

I have reviewed the Stage 2 Workshop material in regard to the above and, as a layperson with little knowledge of the technical aspects of airport operations, I can only comment from my perspective as an elected Borough Councillor on Surrey Heath Borough Council in reflecting the views of my communities.

I must therefore make the point that the approach changes made a few years have resulted in a slightly better experience of the airport with its noise and air pollution generation for residents of the Mytchett, Frimley Green and Deepcut villages.

For the people of Mytchett & Deepcut, in particular, there is no alternative, given current legislation and regulation, but to accept some 80% of the incoming flights flying at low level over their properties due to the configuration of the Farnborough runway. Clearly this causes residents considerable inconvenience and loss of amenity, most especially at weekends and Bank Holidays.

Therefore, any change to the current arrival and departure routes at Farnborough Airport that causes any increase whatsoever to aircraft movements over Mytchett, Frimley Green and Deepcut would not be acceptable to residents of those villages or to me as their elected representative. This is the only important consideration that these residents and I have in regard to the proposals put forward at the Stage 2 Workshop.

I would happily receive any observations on this feedback that might be appropriate.

Kind regards

[REDACTED]  
**SHBC Councillor and FACC Representative, MFG&D Residents Society**

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[REDACTED]  
[REDACTED]

## EXT: FW: Reminder: Farnborough Airport Airspace Change Engagement - Stage 2 Workshop material

[REDACTED]  
Fri 05/01/2024 15:40

To: FASI-S Farnborough Airport <fasi-s@farnboroughairport.com>

Cc: [REDACTED]

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear [REDACTED]

Thank you for this reminder.

Regarding your two specific questions, my response is as follows.

The Statement of Need acknowledges that significant gains in “*environmental performance of inbound and outbound traffic*” are dependent upon NERL making significant changes to the LTMA route network; potential gains accruing primarily from an ability to operate Continuous Climb and Departure operations (CCO/CDO). This, presumably, enabling the floor of the airspace to be raised for the benefit of those who are overflown, and the uncontrolled airspace corridor between Farnborough’s and Gatwick’s controlled airspace be increased for the benefit of other GA users.

A further aim is to create an airspace capacity that enables “efficient “ growth. It is worth noting that the CAA, in response to the LAMP stage 3 submission, draw attention to its Qualitative Safety Assessment which concludes that increases in Farnborough traffic has the potential to raise safety issues within the LTMA that would need to be mitigated by enhanced flow management measures. I assume that the establishment of environment friendly holding volumes of airspace would be among those measures.

Given these two observations, the Stage 2 design principles cannot be wholly aligned with the Statement of Need as they cannot include definitive ‘en-route’ design options; they can only identify the limited noise mitigation options available when aircraft are operating within the initial or final ‘transition’ phases of flight.

Regarding your second question, there are no further design options that I would like you to consider.

Kind regards

[REDACTED]

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**Contents**

**Second Round of Engagement Feedback.....Pages ) \$-57**

**From:** [REDACTED]  
**Sent:** Tuesday, May 14, 2024 3:50 PM  
**To:** FASI-S Farnborough Airport <fasi-s@farnboroughairport.com>  
**Cc:** New [REDACTED]  
**Subject:** EXT: RE: Farnborough Airport - Airspace Change Proposal - Stage 2 Options - Additional Information

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello and thanks [REDACTED]

I sense from earlier exchanges you have a good understanding of the Cranborne Chase National Landscape position, so I don't need to repeat them.

I should mention, in case it has passed you by, that the amended s.85(A1) of CRow Act puts a more onerous responsibility on 'relevant authorities' in connection with decisions that affect National Landscapes and National Parks.

Regards [REDACTED]

[REDACTED]  
Chartered Landscape Architect

Principal Landscape & Planning Officer (part-time, Mon-Wed)

**Cranborne Chase National Landscape**

an Area of Outstanding Natural Beauty

Cranborne Chase NL Office, Rushmore Farm, Tinkley Bottom, Tollard Royal, Wiltshire, SP5 5QA

Classification: Public

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear [REDACTED]

Thank you for your email below together with the latest information on the options being examined.

I see in the G & A paper that consideration has been given to protected landscape/AONB at this stage. I may have missed it but can you please let me have the AONB assessments for each option.

Understandably, in your assessments you used the "official" boundaries which presumably were the AONB boundaries designated in 1958. Also I note you are aware of Natural England's proposals to extend the Surrey Hills AONB (now termed National Landscapes) boundaries. The next stage of NE's proposals were to be published on 31 May but have been put back until just after the General Election on 4 July. There will be a further statutory and public consultation on the changes to the previous proposals published last year. Submission to the Secretary of State for a formal designation order to be made is expected to be at the end of this year. However, we do not know quite when the Secretary of State will make a final decision.

You can be forgiven not to know of the significance of the new Levelling-Up and Regeneration Act 2023 in relation to proposals affecting AONBs which your proposals would do.

The Act has introduced a new and stronger legal requirement on relevant authorities, which includes not just planning authorities but yourselves, at section 245 66B(6)(a)(A1) the following:

*"In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty in England, a relevant authority other than a devolved Welsh authority must seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty."*

The duty *"must seek to further the purpose"* is an active duty and not a passive one. It is not simply a process, as possibly before under the previous "duty of regard" under the CROW Act 2000, but is outcome focussed. Your proposals must therefore take all reasonable steps to explore how the statutory purposes of the protected landscape would be furthered.

If your proposals do not conserve and enhance the natural beauty, which includes tranquillity, of the AONB, then they need to include the maximum practical mitigation measures and explain why the option selected would be in the public interest. The same would apply to the CAA in determining the proposals.

I suggest you take legal advice as to how you can comply with this new legal provision. As it is so new the courts have not given any interpretation or direction on how this legal provision needs to be applied in practice. We are awaiting formal Government advice to be issued through Natural England, which should be shortly.

I have copied this email to [REDACTED] at Surrey County Council as [REDACTED] is taking a strategic planning approach to the proposals and because [REDACTED] is covering to an extent for me, as I have been unable in my part time role to give the process the attention I would have liked.

Please do not hesitate to contact me if you have any queries especially over this new legal provision.

Kind regards,

[REDACTED]

Surrey Hills AONB Planning Adviser

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Friday, June 7, 2024 1:04 PM  
**To:** FASI-S Farnborough Airport <fasi-s@farnboroughairport.com>  
**Subject:** EXT: Stage 2 Additional Information

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon,

Thank you for the additional information provided for the Stage 2A feedback for the Farnborough FASI ACP. While the presented design options largely look to comply with the DPs, some of them may not entirely meet DP5 (*Aim to remove interdependencies with adjacent ATC units and minimise impacts on other airspace users.*) Instrument flight approaches to Odiham are already impacted by Farnborough arrivals and departures due to the nature of the airspace and the proximity of the two units, this is covered in the LOA between the two units which would require update to ensure a fair and equitable use of airspace. Funnelling of GA and other airspace users to the south further restricts airspace and limits options of where Odiham traffic can hold while awaiting clearance to transit Farnborough Class D. The Odiham ILS to RW27 requires access to Farnborough Class D airspace. Interdependency cannot be removed without significant impact upon Odiham and Defence traffic.

MOD would also like to emphasise the potential impact of both this ACP, and additional movements at Farnborough would have on adjacent MOD ATC units, and defence airspace users in this area, including Ash Ranges. Any increase to the volume of CAS around Farnborough, particularly when combined with the collective increases in CAS through the FASI programme, will have an effect on airspace availability and freedom to manoeuvre.

Kind regards,

[REDACTED]  
[REDACTED] ent  
[REDACTED]

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**From:** [REDACTED]  
**Sent:** Thursday, June 6, 2024 7:44 PM  
**To:** FASI-S Farnborough Airport <fasi-s@farnboroughairport.com>  
**Subject:** EXT: RE: Farnborough Airport - Airspace Change Proposal - Stage 2 Options - Additional Information (Updated date)

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear [REDACTED]

There is little point in FNG communicating further with the airport as it continues to refuse to discuss the concerns we and the public have tried to raise. It is clear that the airport's FASI-S process is a tick-box exercise and it is therefore falling well short of the consultation required for such a process. A public Teams call is not an appropriate way to discuss what are technical issues that require direct engagement, discussion of evidence and several hours to present.

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Several of us in FNG have conducted large public consultations using highly structured government processes and procedures under public and government scrutiny. We recognise the need for impartiality but in this case, it is being used as an excuse not to listen. The reality is that expansion in aviation fundamentally undermines the most critical issue facing this planet. These plans drive increases in GHG emissions rather than reduce them. They increase noise disturbance and pollution which are significant public health risks. We do not support any of them and the principles on which the evaluation is based are flawed. We specifically require the process notes our objection to the poor consultation process and Farnborough Noise Group should not be listed as an organisation that has been consulted with as consultation with us has not occurred.

Regards,

Farnborough Noise Group

## **Consideration of FASI-S Farnborough Stage 2 Stakeholder Engagement (2nd round)**

### **General comments**

For almost all members of the public, increases in the number of flights (a planning issue) and changes to airspace (a CAA issue) are bad. Although decided separately, the two are inherently connected. Evaluating flightpath options is like asking people to comment on which part of the river sewage should be dumped in. The general public gain no benefit from changes to flightpaths or increases in the number of flights but suffer the noise, pollution and harm.

Much of the design for Farnborough's proposed flightpaths is to reduce the workload on air traffic controllers. People using Farnborough Airport are the wealthiest people in the world flying on the most expensive aircraft and not paying tax on the fuel. NATS should hire some more controllers rather than saving pennies at the expense of the public living in surrounding areas!

The public are not being consulted at Stage 2 (this stage). The public will be consulted in Stage 3 (sometime after October), by which time all the component parts of the flightpaths will be largely locked in. The public has little faith in the process as, for example, Farnham residents were assured in 2014 that the current flightpaths would not be over Farnham. Look what has happened and what is being proposed with the new flightpaths.....There comes a point where enough is enough. A bit like Monty Python's Mr Creosote and what harm "*just one more wafer-thin mint*" could have. Airspace is for everyone and there is a point where aviation has had its fair share. Many government and non-government advisors are recommending that UK aviation expansion must stop and some European countries are starting to reduce the number of flights.

Farnborough Noise Group strongly opposes all the proposed flightpaths put forward as there should be no expansion of airports and none of the proposed flightpaths address the concerns that we have raised. They all cause harm with no benefits to the general public.

### **Issues with the design principles used for the options evaluation**

There are national guidelines, such as Air Navigation Guidance 2017 that is supposed to protect rural areas from aircraft noise. Yet the design principles developed by Farnborough Airport, such as principle 4a which aims to reduce the number of people overflowed by putting flightpaths over low density populations directly contradicts with ANG 2017. Ambient noise in rural areas is considerably less (35 – 37 dBA) than urban areas (45 – 50 dBA) so the noise disturbance of aircraft (50 – 80 dBA) is much more noticeable for people in rural areas. Farnborough's options are scored against their design criteria, not against national noise and environmental guidelines, so the design outcomes are contradictory to guidelines (and legislation in some cases). National Landscapes in Surrey/Hampshire are being expanded because of the recognised need to protect rural areas and the health benefits they provide to the wider public. All FAL's proposals conflict with this national need – and for a few thousand people who choose (unnecessarily) to use private jets.

People locally experience aircraft noise and pollution from many sources (Farnborough, Heathrow/Gatwick, General Aviation & military). Farnborough's designs only consider Farnborough aircraft. All aircraft noise was supposed to be measured in the last airspace change - it wasn't. A report was quietly slipped into the Farnborough's Airspace change process a few weeks ago (Annex E – General Aviation and Glider Study - <https://www.caa.co.uk/media/acyn5wh3/farnborough-pir-annex-e-general-aviation-and-glider-study-issue-1-1.pdf>). It shows that GA aircraft are flying lower and in more concentrated paths especially south of Farnham (rat-running around controlled airspace) as a result of the change in airspace (figures 7, 5 & 5). As they are flying at half the previous height, they are approximately four times louder. This is a direct consequence of the change in

## **Consideration of FASI-S Farnborough Stage 2 Stakeholder Engagement (2nd round)**

airspace established for Farnborough but the airport refuses to discuss non-Farnborough noise, nor will the CAA.

Helicopters are routinely flying low under CTA4/6 and breaching minimum height and British Helicopter Association guidelines. FAL/NATS have refused to discuss this issue and directed people to the CAA. The CAA advises the public to contact the pilots and will not recognise the situation as a procedural, compliance and safety issue that it should address.

Design principle 6d is not satisfactory because more aircraft from LTN/LHR/LGW are now flying lower (10,000ft – 5,500ft). Only including Farnborough aircraft to 7,000ft does not consider the issues of ground height and the wider issue of aircraft noise from other sources. This combined effect is being considered in Stage 3. But by then it will be very difficult (impossible) to deconflict the component parts. The issues need to be considered in Stage 2 (current) designs.

Noise and pollution have still not been measured adequately by FAL as a baseline so cannot be considered against future options evaluation. All noise and pollution must be measured – not just FAL aircraft, as it is all noise and pollution that causes disturbance and health impacts. This is the approach that DEFRA takes but the CAA does not.

Flightpaths and climb/descents were set out in the Farnborough Airspace Change Process (document CAP 1678) but they are not being followed e.g. over 50% of runway 06 departures to the east are not at 4,000ft over the A31. Many 06 departures are flying up the STAR not the SID. You cannot consult on flightpaths and measure their impact if they are not the flightpaths being flown.

### **Scoring of options**

The options scoring is based on design principles. The design principles do not align with guidance and legislation. Specifically, Air Navigation Guidance 2017, BHA Guidance and Rules of the Air minimum height regulations.

Scoring criteria 1 states the design *“Must be as safe or safer than today for all stakeholders that are affected by the airspace change”*. Uncontrolled airspace is now more dangerous than before so it should be scored Red. Pushing risk from controlled airspace to uncontrolled airspace, then assessing the safety of just controlled airspace is highly misleading for an organisation whose primary goal is aviation safety.

Combining fundamentally different components in criteria 4, such as *“b) a reduction in CO2 emissions per flight from Farnborough aircraft”* and *“d) a reduction in the reliance on tactical intervention”* undermines the validity of scoring. The scoring only includes Farnborough aircraft yet all *“stakeholders that are affected by the airspace change”* as should be included, as stated in criteria 1.

Criteria 6 states *“d) avoid overflying the same communities with Farnborough's routes and those to & from other airports below 7000ft”*. That must include General Aviation in unrestricted (Class G) airspace as they are a significant contribution to noise. But the criteria don't include noise from GA or from LTN/LHR/LGW aircraft above 7,000ft are often noisier than Farnborough aircraft and are flying lower since controlled airspace was implemented. As we have said for years, there must be proper and comprehensive noise measurement of all aircraft.

**Consideration of FASI-S Farnborough Stage 2 Stakeholder Engagement (2nd round)****Specific points****Option 2A & 2B**

The same people (Farnham, west, south and east of Farnham) are more extensively overflown and are also under the rat-run of GA aircraft under CTA4 (P45), military flightpaths and the commercial flights to 2Excel aviation at Lasham.

**Option 3A & 3B**

FAL aircraft are already flying the “bent” 06 route. There should not be a direct route to Biggin Hill/LGW as it will increase the density of aircraft at low height (2,000ft AGL) over the same areas that are suffering GA rat-running.

**Option 4A & 4B**

More flightpaths are concentrated over the same people, especially south of Farnham. There should not be a direct route to Biggin Hill/LGW as it will increase the density of aircraft at low height (2,000ft AGL) over the same areas that are suffering GA rat-running.

**Option 5A & 5B**

Even worse....northerly arrivals moved to the south so more flightpaths are concentrated over the same people, especially south of Farnham. There should not be a direct route to Biggin Hill/LGW as it will increase the density of aircraft at low height (2,000ft AGL) over the same areas that are suffering GA rat-running.

**P42**

The need for a holding stack increases exponentially to the increase in flights. More than 10 movements an hour results in circuits. At 15 movements an hour, circling and diversions are extensive. FAL should control the flow of arrivals so that it does not exceed 10 movements an hour and a holding stack is not needed. The Farnham holding stacks (do nothing and proposed) are unacceptable as they are over the areas that are already most blighted by FAL, commercial, GA and military aircraft.

**P44**

What was the source of the data? The CAA has repeatedly said that such data is not valid and radar data is needed to accurately show aircraft location & height (through interrogation). The data is a significant underassessment as it will miss nearly half GA that do not have a transponder or can't be interrogated for height. There are also many aircraft/operators who choose to exclude their data from publicly available data.

**P45**

The chart shows the issue of rat-running under areas such as CTA4. These aircraft need to be directed to fly through CTA4 at greater height – this is what was expected in the 2014 ACP consultation. Alternatively, CTA4 should be changed and lowered to the ground to force GA to go further south and to spread the noise burden over a wider area (gliders can't fly below CTA4 anyway). Alternatively, FAL's flightpath need to be moved so it is not the same people suffering all types of overflying.

**P46**

There is data missing between 2,500ft and 4,000ft.



## **Consideration of FASI-S Farnborough Stage 2 Stakeholder Engagement (2nd round)**

### **Recommendations**

- 1) It is a tiny minority of people who use private jets. Most of FAL's flights are not business related and there are ample commercial flights available to the same destinations served by Farnborough. Why should convenience and profit be put before the health and wellbeing of people and the planet? It is inevitable that aviation will have to be significantly reduced to achieve the legally binding commitment of Net Zero and that should be planned for now – not increasing the number of private jet flights and associated flightpaths.
- 2) Rural areas and quiet places are important for wildlife and human wellbeing. They are national assets and they are far more important than the speed and efficiency of flights.
- 3) All noise and all pollution must be considered as it is all noise and pollution that causes harm. Options for just private planes cannot be considered without including the impact of General Aviation and scheduled flights.
- 4) If there are going to be aircraft disturbing people and places, they should be spread widely rather than concentrating them. Technology allows for this.
- 5) If people are going to fly and businesses are going to profit at the expense of others, they should pay for that (in a tax on fuel/flights) and those harmed should be compensated for the harm to them, their amenity and the damage to the value of their property. This is the Polluter Pays principle enshrined in the Environment Act.
- 6) None of the proposed options are acceptable as the principles on which they are based are wrong and not consistent with aviation guidelines, health guidelines and national legislation.

There is a lot of terminology and acronyms in aviation. An explanation of these terms is here.

[https://www.farnboroughnoise.org/files/ugd/17001e\\_513879e8010846e9b0358cb24d716402.pdf](https://www.farnboroughnoise.org/files/ugd/17001e_513879e8010846e9b0358cb24d716402.pdf)