



**NATS South Coast Airspace Change Proposal
Consultation Feedback Report Part B**



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1 Introduction

1.1 This feedback document describes a NATS proposal for changes to airspace routes centred on the South Coast between Brighton and Poole, referred to herein as the South Coast Proposal. The South Coast Proposal was initially part of the TAG Farnborough Airport airspace proposal (see 1.2 below), but has been undertaken by NATS as it relates to changes required for the efficiency of the network as a whole and forms part of the wider London Airspace Management Programme (LAMP), rather than relating exclusively to the local Farnborough operation.

Background

- 1.2 In 2014 TAG Farnborough Airport consulted on proposed changes to the air traffic routes to and from the airport. TAG Farnborough has subsequently published Part A of the Consultation Feedback Report. Part A outlined the response to the consultation, raising a number of matters which TAG Farnborough concluded required further consideration. TAG Farnborough are currently reconsidering their proposed design in the light of this feedback, and will publish a Part B of their Consultation Feedback Report once this work is complete. This will outline their chosen design and next steps with regard to the design of low altitude routes into and out of Farnborough Airport.
- 1.3 TAG Farnborough's proposal is focused primarily on changes that would modernise their local operation. However, their consultation and associated Part A Feedback Report also covered changes required to connect to the network of routes at higher altitudes for Farnborough, and for Southampton and Bournemouth airport routes that use the same higher altitude routes as Farnborough.
- 1.4 These elements of the design are critical to the efficiency of the wider airspace network for which NATS is responsible. Therefore NATS agreed to progress these aspects separately as the South Coast Proposal. This document is Part B of the Consultation Feedback Report specifically for the NATS South Coast Proposal, as per Figure 1 below:



Figure 1 Evolution of TAG Farnborough and NATS South Coast Proposals

- 1.5 With the agreement of TAG Farnborough, NATS has used the consultation information from TAG Farnborough Airport's Consultation Feedback Report Part A to compile this document. Where necessary, TAG provided additional information to NATS on these specific areas of consultation interest.
- 1.6 Reference material for this proposal is listed at the back of this document (see Section 8).
- 1.7 Geographically the South Coast Proposal covers changes over the English Channel and South Coast between Brighton and Poole as highlighted in blue in Figure 2 below. This map is adapted from those in the TAG Farnborough consultation material, and also shows the wider geographic area covered by their consultation. Please note that this Proposal primarily relates to airspace use between 4,000ft-7,000ft east of the New Forest/Yarmouth, with minor changes to airspace use for some Bournemouth Airport arrivals down to 2,500ft.
- 1.8 The TAG Farnborough consultation material was split into parts relating to three geographic areas: B (north), C (south) and D (southwest), along with Parts A (introduction and background) and E (aviation technical matters). To see the geographical breakdown by consultation area, see the TAG consultation material (Ref 3).
- 1.9 These parts of the consultation material should not be confused with the similarly titled parts of the TAG Farnborough Feedback Report (TAG's independently published equivalent of this document). Where a 'Part' is referenced we will always state whether it relates to Consultation Document Parts A-E or the TAG Consultation Feedback Report Parts A or B.

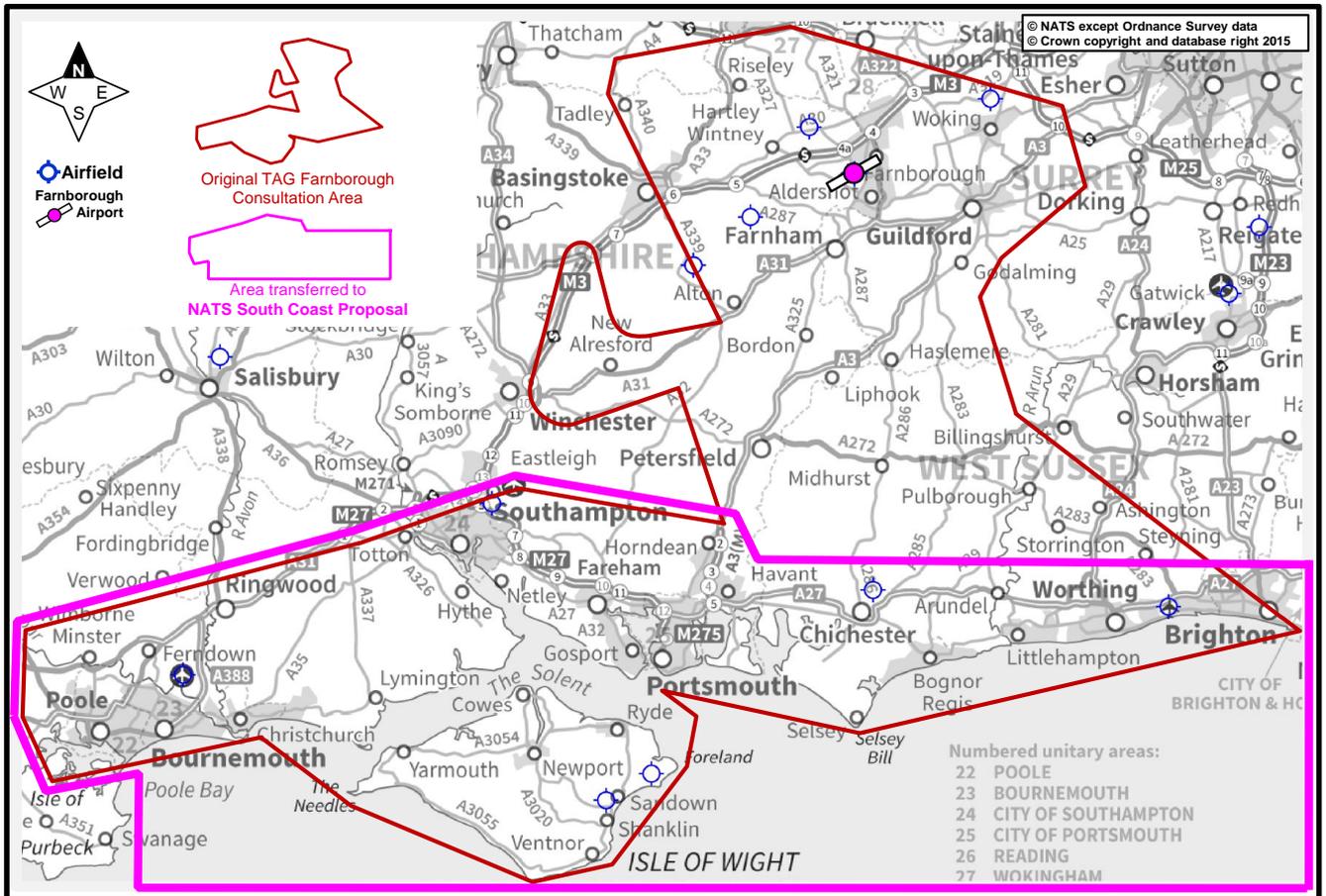


Figure 2 Area transferred from TAG Farnborough to NATS

- 1.10 Changing the alignment of routes will affect the pattern of over-flights and therefore has potential environmental consequences. There is also the potential for impacts on other airspace users.
- 1.11 The NATS South Coast Proposal covers changes to the following:
- a) Routes for arrivals to TAG Farnborough Airport from the southeast and southwest¹
 - b) A route for arrivals to Southampton Airport from the east²
 - c) A route for arrivals to Bournemouth Airport from the east³
 - d) A contingency holding pattern for all three airports that arriving traffic can use if there are delays
 - e) Associated airspace volumes to contain the above
- 1.12 The South Coast Proposal includes some other changes above 7,000ft within existing controlled airspace⁴.
- 1.13 The NATS South Coast Proposal has been designed so it may be implemented either simultaneously with TAG Farnborough's proposal, or separately to fit in with Farnborough's existing arrival routes (with a minor modification to those routes).
- 1.14 TAG Farnborough's proposed airspace is separate to this NATS LAMP proposal, and is not shown on any charts in this document.
- 1.15 **It is assumed that the reader is familiar with the TAG Farnborough consultation material and their Feedback Report Part A.**
- 1.16 This document refers extensively to those TAG documents, to avoid unnecessary duplication of text. It also refers to Government and CAA guidance documents (see Section 8).

¹ TAG Farnborough's Consultation Document Part C Figure C7 illustrated the current flight-paths typically followed by arrivals from the south to TAG Farnborough Airport. Figure C10 illustrated the equivalent flight-paths under this proposal.

² TAG Farnborough's Consultation Document Part D Figure D5 illustrated the current flight-paths typically followed by arrivals from the east to Southampton Airport. Figure D8 illustrated the equivalent flight-paths under this proposal.

³ TAG Farnborough's Consultation Document Part D Figures D6 and D7 illustrated the current flight-paths typically followed by arrivals from the east to Bournemouth Airport. Figure D9 illustrated the equivalent flight-paths under this proposal.

⁴ Changes above 7,000ft generally do not require consultation – see Ref 1

2 **Consultation Objective, Analysis Process, and Proposal Justification**

- 2.1 When changes are proposed to airspace arrangements, the sponsor takes into account Government and CAA guidance (Refs 1 and 2 respectively). These highlight a number of factors that must be considered and balanced in the development of a proposal, ranging from safety and equitable access for all users, to CO₂ efficiency and noise mitigation.
- 2.2 The CAA process for airspace change (Ref 2) states that consultation is about 'confirming and attaining opinions about the impacts of a proposed change'. The TAG consultation feedback report Part A (Ref 4) describes in detail the opinions provided in response to the consultation.
- 2.3 This document describes how we have considered these opinions alongside the guidance; and any actions we have taken as a result.
- 2.4 When interpreting consultation feedback it is important to note that the CAA has indicated the aim of the airspace consultation process is not to gauge the popularity of a proposal; it is not a voting process, but rather it is a process for identifying new and relevant information that should be taken into account in the proposal alongside the existing guidance (Refs 1 and 2). All relevant issues are therefore considered equally whether they are raised by a single respondent or a majority.

Justification

- 2.5 The justification for this proposal is the overall improvement of airspace management in this region and of the wider airspace system. It forms part of LAMP Phase 1A which also includes other changes to the route structure around London and the South East (see Refs 5, 6 and 7). In addition to these route changes NATS is also changing the way airspace is divided between different teams of air traffic controllers; this is called 'sectorisation'.
- 2.6 Individually, these route changes do not have a significant impact on overall system performance; cumulatively, however, the LAMP Phase 1A changes represent a major step forward for the modernisation of airspace over London and the South East reducing delay, CO₂ and overall noise impacts .

3 **Assessment of environmental feedback and proposed route design**

- 3.1 TAG Farnborough's Consultation Document Part A paras 10.16, 10.35 and 10.36 (Ref 3) illustrated the environmental impacts from the proposed changes to the routes listed in para 1.10 above.
- 3.2 The proposed changes were developed with reference to the generic guidance on airspace change provided by the Government and the CAA (Refs 1 and 2 respectively).
- 3.3 The questions in Parts C and D of the consultation document (Ref 3) addressed the potential environmental impacts of the proposal; stakeholders added amplifying text and comments that were subsequently 'themed' by TAG's consultation team.
- 3.4 This theming was undertaken to understand whether stakeholders' concerns corresponded with the environmental requirements laid out in the Government guidance. Each response was analysed in detail to identify whether there were any unique local factors that would mean the generic guidance did not apply.
- 3.5 Figures 35 and 47 of TAG Farnborough's Consultation Feedback Report Part A (Ref 4) show that concerns about noise, tranquillity, fuel/emissions, local air quality and other quality of life issues make up the vast majority of the comments regarding environmental impacts.
- 3.6 These factors are covered in the Government guidance (Ref 1).
- 3.7 The analysis of responses highlighted no unique local characteristics that suggested deviation from the guidance would be justified. We believe these proposed route alignments are in line with the guidance, and provide an appropriate balance between the environmental and operational benefits and impacts.

4 **Assessment of aviation feedback and design for controlled airspace**

- 4.1 Aviation feedback was primarily from General Aviation and Sports & Recreational Aviation (GA/S&RA). This is the generic term for flights operating out of smaller airfields, generally for recreational purposes such as gliding or leisure flying, and usually where they do not have to seek ATC permission.
- 4.2 The South Coast Proposal involves extending controlled airspace (CAS). A large number of responses were received from GA, primarily focused around the low altitude changes in the vicinity of Farnborough Airport, but also referencing CAS changes that now form part of the South Coast Proposal.
- 4.3 Analysis of the consultation responses (Ref 4) indicates that the answers to questions E4, E5, E7 and E13, combined with the themed analysis of aviation-related comments within Parts C, D and E, to be the most useful illustrations of the aviation views in this area.
- 4.4 The majority of aviation comments concerned adverse impacts on non-airways airspace users due to proposed lowering of the base of Class A airways.
- 4.5 These expectations are borne out by the results illustrated in Figures 53, 54, 56, 65, and 72-74 of TAG Farnborough's Consultation Feedback Report Part A (Ref 4). Concerns about impact on other airspace users, safety, airspace dimensions and design were all raised.

Revised Design for South Coast CAS

- 4.6 In the following paragraphs we use aviation-technical language and abbreviations when referring to the four proposed CAS regions off the south coast. These were originally illustrated in TAG Farnborough's Consultation Document Part E Figures E2 and E3 (Ref 3).
In this document they are called (from west to east):
The IOW region, the Y8 sliver, the Selsey region⁵, and the Pagham region.
- 4.7 These blocks were proposed to accommodate new or amended arrival routes into Southampton, Bournemouth and Farnborough airports, and to contain a new contingency hold shared between the three airports. These arrivals would be descended below other LTMA⁶ flights in this area and removed from their current position further to the north.
- 4.8 This would provide separation between Southampton, Bournemouth and Farnborough flights and LTMA flights, which would reduce the complexity of the LTMA airspace tasks and improve the efficiency of the air traffic control function in the region. See Figure 3 below for the route schematic.

⁵TAG Farnborough's Consultation Document Part E Figures E2 and E3 (Ref 3) showed the Selsey region to have the CAS base as FL125, which was the case during the consultation period. This particular base (also known as 'The POMPI Triangle') was approved by the CAA to be lowered to FL105 mid-2014 and this was implemented in September 2014, so the remainder of this document will refer to that current base of FL105. The VFR charts below have been modified accordingly.

⁶ LTMA flights are predominantly those into and out of London's major airports, which in the vicinity of the South Coast means Heathrow and Gatwick traffic flows. LTMA stands for London Terminal Manoeuvring Area. See Ref 3 for further details.

- 4.9 Figure 4 and Figure 5 respectively show the CAS originally proposed for the South Coast region by the TAG Farnborough consultation, and the revised CAS now being proposed by NATS considering the consultation feedback. All CAS to the north would be unaffected by the South Coast proposal.
- 4.10 The alignment of the arrival routes within the CAS will remain as per the consultation as far as the Goodwood (GWC) VOR. Low level route changes and CAS to the north are not proposed here; these would also be the responsibility of TAG Farnborough to progress at a later date).

NATS

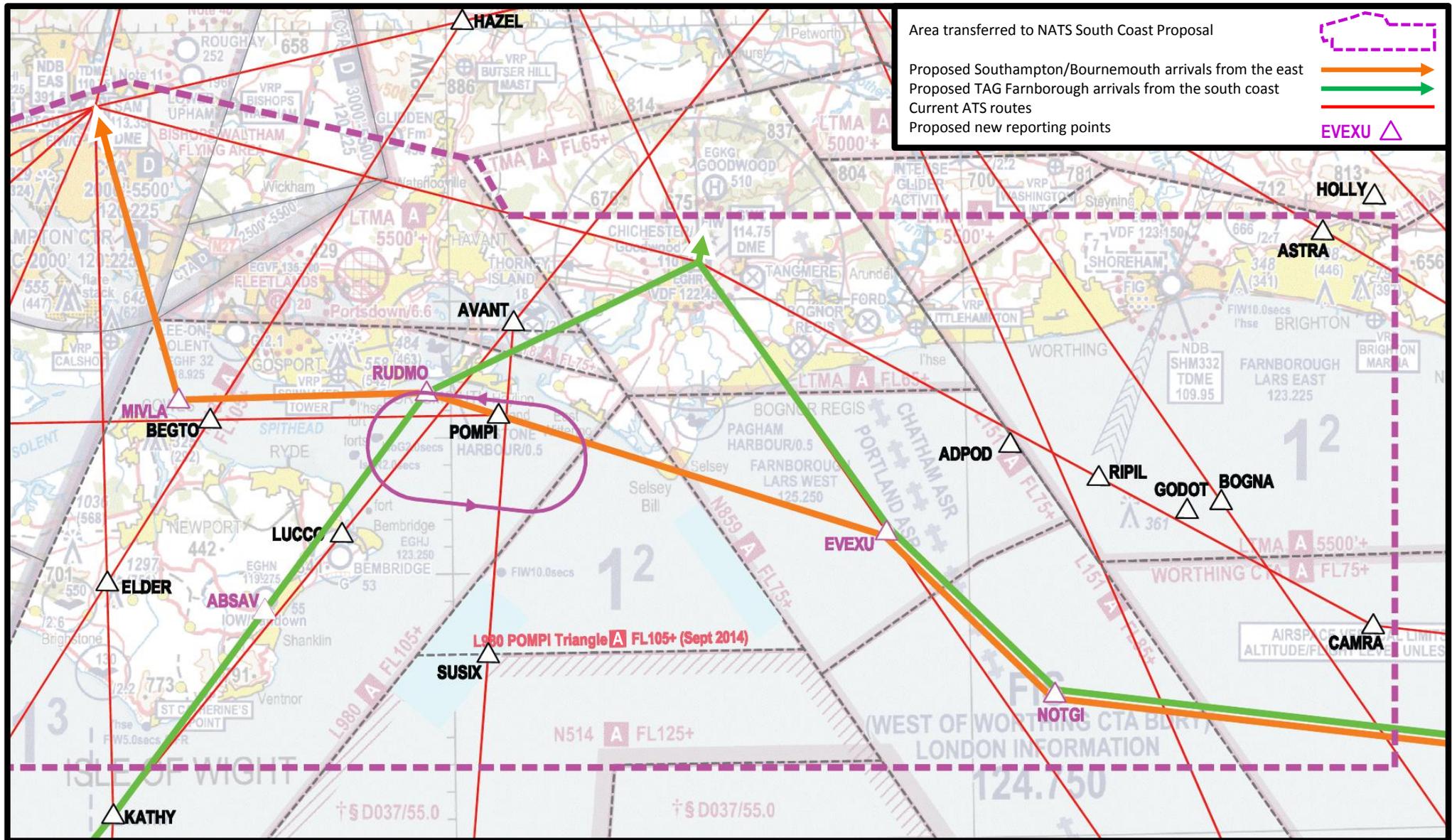


Figure 3 Arrival routes as originally consulted upon (adapted from Ref 3 Part E)

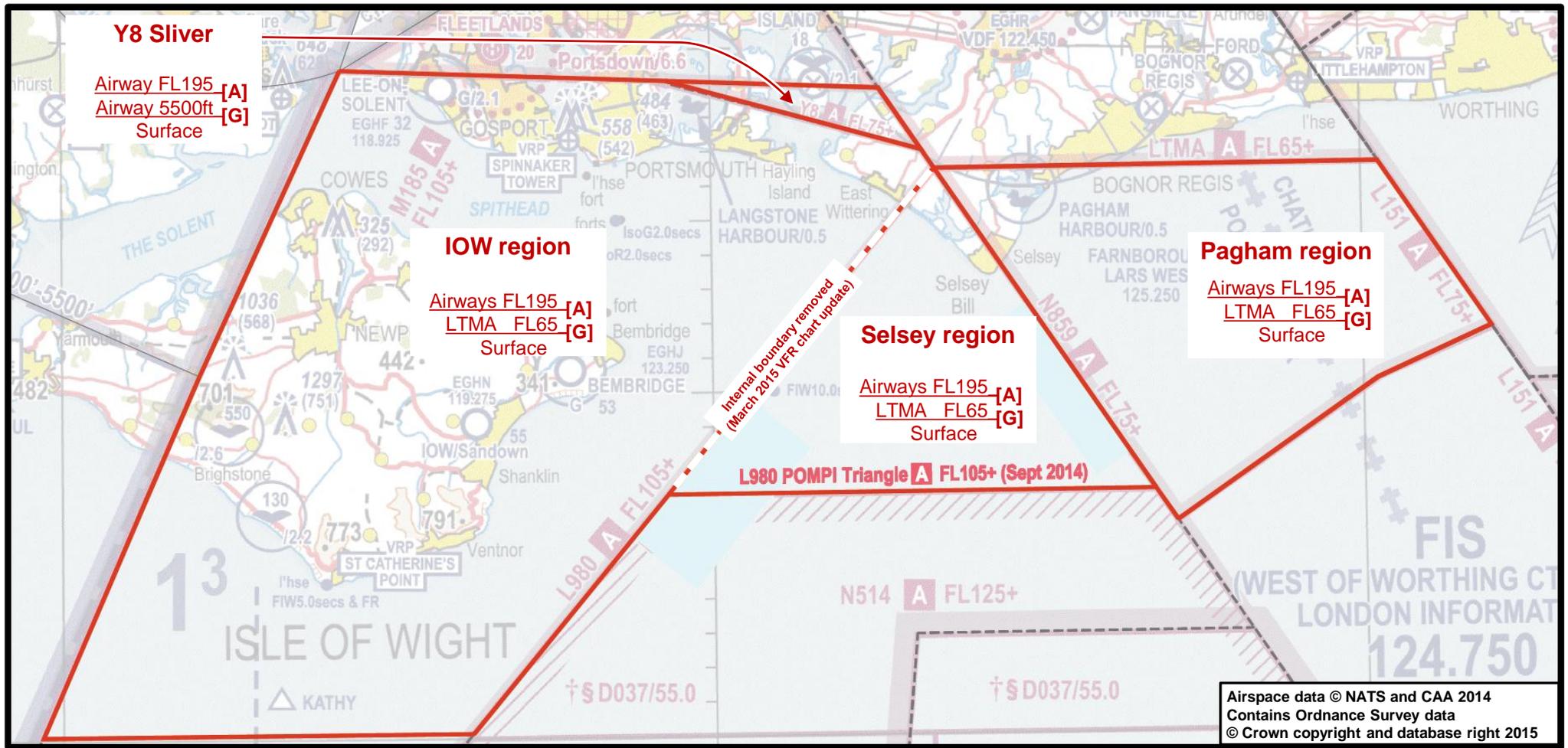


Figure 4 Proposed airspace volumes along the south coast - as originally consulted upon (zoomed in view)

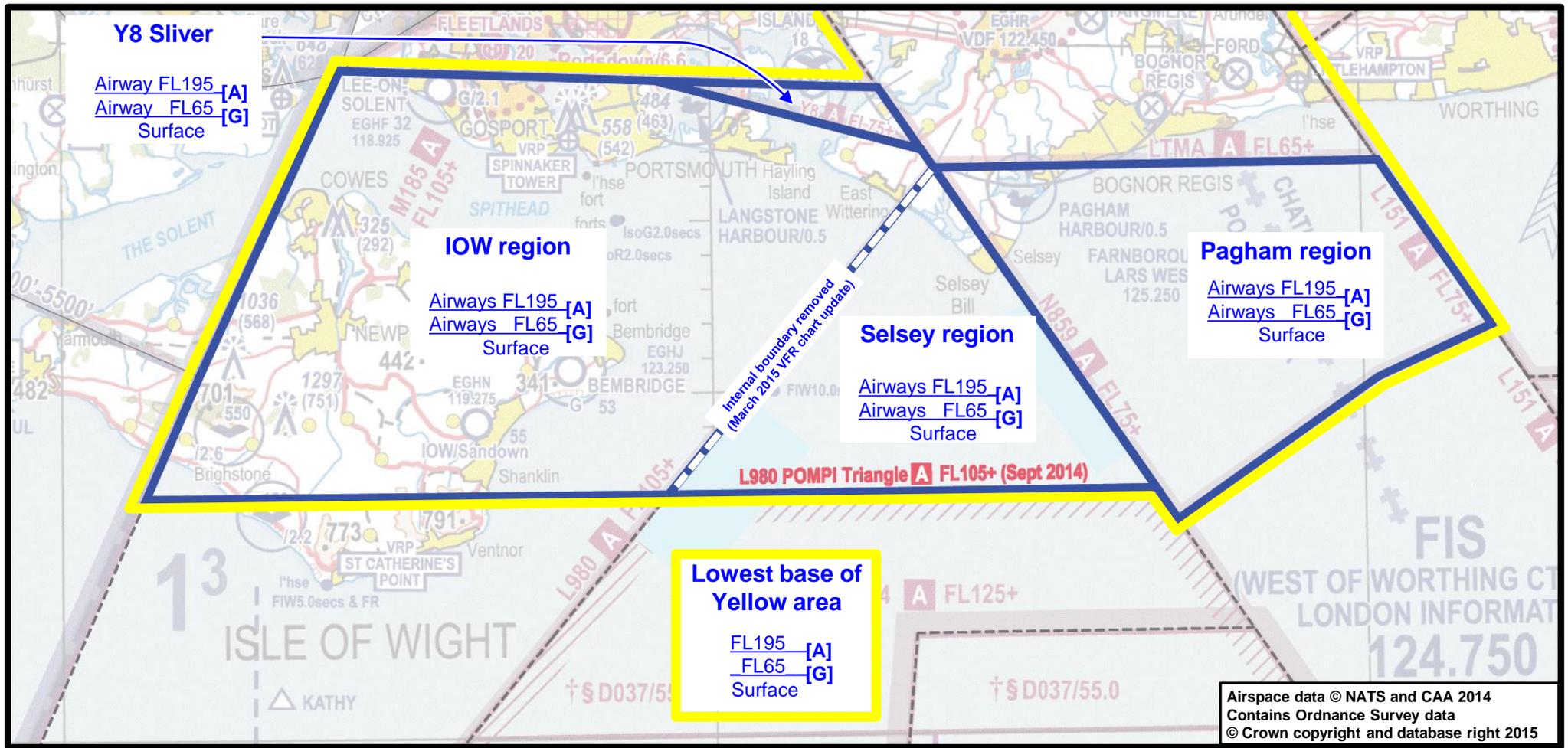


Figure 5 Proposed airspace volumes along the south coast – modified following consultation feedback

Reduction in Proposed Class A volume in the Y8 Sliver

- 4.11 We have identified that, rather than make the CAS base of this airway sliver 5,500ft to match the LTMA to the northwest, as originally planned, it could be made FL65 to match the consulted-upon CAS to the south.
- 4.12 In line with consultation feedback and comments this would make the region's FL65 base more uniform and easier to navigate & to chart.

Reduction in the proposed Class A volume in the IOW region Removal of impact on VFR Recommended Route

- 4.13 We modified the proposal so that arrivals from the southwest do not descend as early as originally envisaged.
- 4.14 The Southampton and Bournemouth radar-vector arrival flows from the east would follow the paths described in TAG Farnborough's Consultation Document Part D Figures D8 and D9 (Ref 3), but we have developed procedures so they would not proceed further south than illustrated. This allows us to truncate the IOW region to the same southern edge as the Selsey triangular region.
- 4.15 The revised CAS boundary between FL105 and FL65 is now proposed to run roughly east-west between southern Shanklin and Brighstone. This would leave an area of approximately 100nm² in the southern IOW region with a base of FL105 as it is today.
- 4.16 Some stakeholders were concerned that the VFR recommended route to France and the Channel Islands would be impacted by the proposal. This route is marked on VFR charts as a southbound blue dashed line starting west of St Catherine's Point lighthouse VRP. Higher-altitude spin/stall training and aerobatics were also mentioned by some stakeholders as being impacted. The proposed shrinking of the IOW region would mitigate the concerns of the users of that VFR route, and would partly mitigate concerns of compression with respect to aerobatics and spin/stall flight training.

Funnelling and compression concerns over the South Coast

- 4.17 Funnelling/compression of GA aircraft beneath the Class A areas was a concern raised during consultation.
- 4.18 TAG Farnborough's Consultation Document Part E (Ref 3) Section 15 stated that, based on expert operational view, the majority of GA VFR activity occurs below FL65 in these regions.
- 4.19 TAG acknowledged that some activity would be impacted, but stated that the potential capping of GA VFR activity below FL65 due to this proposal would still meet the requirements of as many users as possible most of the time.
- 4.20 Question E13 (Ref 3) asked specifically about how often the proposed capping would impact VFR operations in these regions.
- 4.21 Figure E13 on page A73 of TAG Farnborough's Consultation Feedback Report Part A (Ref 4) provides the results of consultation feedback for this question. 6% of stakeholders who answered questions in Part E of the consultation (Ref 3) stated it would impact them 'often'.

- 4.22 In response to this consultation result, TAG commissioned an analysis of one month's radar data⁷ in these regions to identify the amount of transponding⁸ GA VFR that would be impacted as a result of the proposal. The flights were counted if they were within the proposed volumes for more than sixty seconds⁹.
- 4.23 The average number of eligible flights in the busiest region was 1.6 per day¹⁰.
- 4.24 While the analysis is not able to capture aircraft that are not transponding, we believe that the data for transponding aircraft provides a good indication of the order of magnitude of GA/S&RA usage of the airspace, particularly as aircraft operating at the altitudes involved are more likely to be transponding than those at lower altitudes. Considering this, NATS contends that the likely number of aircraft per day being capped at FL65 would not constitute a significant increase to funnelling/compression.
- 4.25 Operational opinion was sought from Solent Radar at Southampton Airport for this feedback report. Solent agreed that TAG's statements are valid, and that the results of TAG's radar analysis were in line with Solent's operational experience.

Chart simplification

- 4.26 Some comments concerned the predicted complexity of VFR charts, should the proposal be implemented.
- 4.27 Combining the changes means that the FL65 base across the wider region would be a slightly simpler set of shapes – see the yellow area highlighted in Figure 5 above¹¹.
- 4.28 We believe the proposed design would meet the operational requirements and would make this area of the south coast easier to show on a VFR chart, consequently improving readability and slightly reducing pilot workload during airborne navigation.
- 4.29 The Pagham region's internal division line between FL65 airway and FL65 LTMA would remain on the VFR chart for now. NATS is looking into the technicalities¹² of moving this boundary line in due course but not within the timescale of this proposal.

⁷ TAG Farnborough used data from 2012 in their consultation.

The data analysed here was for September 2012 and was assumed to be a representative month.

⁸ It is not possible to reliably measure the number of non-transponding flights for two reasons:

- a) It is impossible to tell if primary radar contacts are above FL65 (impacted by this proposal) or below (not impacted); and
- b) They may not be in contact with an air traffic services unit, and thus not recorded.

⁹ We contend that flights occupying the proposed volume for less than sixty seconds would not be significantly impacted if the proposal is approved and implemented.

¹⁰ The IOW region was the busiest with 47 eligible GA flights occupying the proposed CAS volume over the month of September 2012. 47 flights / 30 days = 1.566 flights per day.

¹¹ TAG Farnborough's proposed airspace will be described by them, separately, in their Feedback Report Part B due Q1 2015.

¹² There are engineering systems that depend on the defined differences between LTMA and airway. These systems could not be re-engineered before the planned implementation of this proposal.

Consideration and rejection of a lower classification for these regions

- 4.30 TAG Farnborough's Consultation Document Part E (Ref 3) paragraph 5.31 on page E23 stated that the classification is proposed to be Class A from FL65. The controlling authority would be London Terminal Control (LTC), and the CAS volumes were planned for definition as Worthing CTA. Discussion was undertaken with LTC with respect to Class C arrangements, but LTC explained that it would be difficult for their controllers to integrate IFR and VFR aircraft successfully especially with low numbers and infrequent procedures.
- 4.31 The workload created by GA free-calling LTC for entry, causing frequency congestion, is another issue. Notwithstanding this, NATS investigated establishing Class D volumes, delegated to Solent Radar, as an alternate option, but it became apparent that LTC flights would need to operate in, and through, Solent Class D airspace whilst retaining communications with LTC.
- 4.32 Complex management procedures were discussed between Solent and LTC but crucially it would increase the workload of both controllers. Their workloads would increase even further if VFR traffic was operating in that region.
- 4.33 Ultimately, the complexity of the airspace management between LTC and Solent Radar ruled out Class C and D volumes from further consideration, and those volumes would remain associated with the relevant Class A airway.

5 **Issues and Considerations**

An aim of consultation is to identify whether there are relevant issues that have not been considered sufficiently in developing the proposal.

This section discusses issues and questions raised by stakeholders through the consultation, and outlines how they have been considered.

5.1 **Why are you doing this now?**

This consultation was originally part of TAG Farnborough's airspace change proposal. Due to timescales and commonality with elements of the first phase of the London Airspace Management Programme (LAMP), it was agreed that NATS would progress this higher-altitude South Coast Proposal. TAG will progress their lower-altitude proposal separately.

LAMP is part of the Future Airspace Strategy (FAS), developed by the CAA with the support of the aviation industry. The FAS is the UK's vehicle to deliver the benefits of the Single European Sky programme. This proposal would enable the improvement of the wider system of routes over the south coast. NATS is seeking to enable these benefits as early as possible.

5.2 **Will it mean more flights overhead? Will I see/hear more flights? The alignment of the routes should be changed to avoid my town/village/school/hospital etc**

Overall the South Coast Proposal would reduce the geographic area exposed to noise from flights below 7,000ft due to most of the Southampton and Bournemouth arrival flight-paths shifting over the Solent more of the time. Fewer towns would be over-flown by these flights, and consequently the net impacts would be reduced.

Likewise, Farnborough arrivals from the south and southwest would concentrate in some areas but are likely to be slightly higher than today. Some areas would be over-flown more often, others less, and some would not notice any significant change.

Stakeholders can use the consultation document to determine how the number of over-flights of their area would change in the future, if this proposal is implemented.

5.3 **How can you justify the change, if CO₂ emissions would increase instead of decrease?**

When optimising the network of routes we seek to find a design that provides the best overall performance; this means that a small number of flights may become less efficient in order to enable a benefit for the majority. All the reasoning and figures we present will be part of the proposal presented to the CAA and will be independently assessed by their experts.

For more details see the answer to the question 'Why should we believe what was said?' at para 5.7.

5.4 **Executive jets can never be anything other than CO₂-inefficient on a per-passenger basis**

Proposals such as this are measured on a per flight basis. Executive jets use the airspace and routes, as do commercial aircraft, military aircraft and others. All are treated equally. Enabling improvements to the airspace benefits all the flights using it, and the wider ATC system.

5.5 **How has air quality been taken into account in the proposal?**

Government guidance on airspace change states that, due to the effects of mixing and dispersion, emissions from aircraft above 1,000ft are unlikely to have a significant impact on local air quality. This is the case in our proposal - there are no proposed changes affecting flight-paths below 1,000ft. For more details see the Government guidance (Ref 1).

5.6 **Can you do a bespoke analysis for my postcode?**

We cannot provide a bespoke analysis for every such request; we endeavour to ensure that the consultation material has sufficient information for people to understand the likely effect on their location.

TAG Farnborough's Consultation Document Parts C and D Section 4 (Ref 3) provides full information on the considerations for route positioning, including worked examples.

Stakeholders can use the consultation document to assess the impact of over-flights today and determine how the number of over-flights would change in the future under this proposal.

5.7 **Why should we believe what was said in the consultation documents?**

It is in nobody's interest to present incorrect or misleading information in the consultation material. All sponsors take their responsibilities very seriously and whenever proposed changes are presented, it uses the best available information.

The process for airspace change is regulated by the CAA, which reviews consultation material before publication to ensure suitability and compliance with their process. The CAA also monitors consultations in progress, and where the sponsor has issues or queries, the CAA provides guidance regarding continued compliance.

As part of the airspace change process the sponsor is required to analyse performance after one year of operation, and demonstrate that the change is working as anticipated. If it is not, the CAA may require further changes. This would be costly and time-consuming.

5.8 **Why was the TAG Farnborough consultation document so complicated? Was TAG deliberately trying to confuse stakeholders?**

Airspace design is a complicated and technical subject and this proposal comprised many elements, each with their own justification and impacts. Proposers of airspace changes are required to present all the information on all the potential impacts to stakeholders. To omit potential impacts from the consultation in an attempt to simplify it would leave the consultation open to criticism that it was not a complete representation.

It is acknowledged that stakeholders have a range of prior knowledge, from those experienced in aviation matters through to those who are newly exposed to the subject. The consultation document was split into Parts to enable stakeholders to focus on their specific area of interest. It worked through the environmental impacts from first principles, and explained how air traffic control worked in the areas, allowing those without relevant experience to build an understanding that would enable a considered response.

Given the complexity of the proposal, this inevitably leads to a sizeable consultation document. Whilst this requires an investment in time to fully understand, the TAG Farnborough consultation was right to ensure that all potential impacts were fully described, as only then could the sponsor of the proposal be sure stakeholders had the opportunity to understand and respond to specific issues that may affect them.

The efficacy of the consultation has been borne out by the volumes of responses, as shown in TAG's Feedback Report Part A (Ref 4).

5.9 **How do I know you have considered my response?**

All feedback from this consultation has been given due consideration and reported in the Feedback Report Part A (Ref 4). For those responses relevant to the South Coast Proposal we have presented further analysis in this Part B. The consultation responses and analysis will all be made visible to the CAA as part of our airspace change proposal. The CAA will only approve an airspace change if they have evidence to show that the correct processes have been followed.

We believe that there is a good case for change based on the combined benefits of wider network efficiency and a reduction in the number of people regularly over-flown. We believe that these benefits outweigh the negative impact from increased over-flight for some areas and the route-specific CO₂ increase.

The role of consultation is to make this balance of benefits explicit, and enable participation by those with local knowledge and outlook. Should the consultation exercise highlight any significant and relevant issue that we have not taken into account, then we are duty bound to act on it. We have considered the issues raised by this consultation in Sections 3 and 4 of this feedback document.

Some stakeholders have suggested that all responses should be published; however, this would raise data protection issues. Ultimately, the independence of the CAA as the airspace regulator provides the assurance that due process will be followed.

5.10 **What impact would there be on flora and fauna?**

The CAA's guidance (Ref 2) states¹³ that *It is considered unlikely that airspace changes will have a direct impact on animals, livestock and biodiversity. However, Change Sponsors should remain alert to the possibility and may be required to include these topics in their environmental assessment.*

NATS and TAG Farnborough have no reason to believe flora and fauna would be adversely affected due to this proposal.

¹³ CAP725 Appendix B Page 4 Section 2 Para 18

5.11 Aren't you breaking environmental or planning laws by proposing this change?

The sponsor of an airspace change is regulated by the CAA, which tests each proposal against their guidance on the application of the airspace change process (Ref 2) and its own Government guidance (Ref 1) with respect to environmental impacts.

This proposal complies with the guidance.

5.12 Who will check that the development does what you say it will?

Should the proposal be approved and implemented, NATS will be required to demonstrate to the CAA that it achieves the target objectives. In accordance with the CAA's airspace change guidance (Ref 2), we would provide them with a report on the performance of the changes against the target objectives based on the first 12 months of operation.

5.13 Will it be safe? Will air traffic controllers be able to cope with rising traffic levels? Will other airspace users be safe?

Yes. Safety is our first priority. The routes meet all the required safety standards. The safety of the proposal has been the subject of extensive safety assessment. This includes testing in our simulation facility where air traffic controllers can test the proposed airspace as if it were 'live'.

The air traffic control system has procedures such that if the volume of air traffic rises to a certain level, restrictions are imposed to stop further aircraft entering the congested area until traffic levels have reduced again. This is (in very simple terms) how safe levels of traffic are maintained. These restrictions mean aircraft are held on the ground, which causes delays.

NATS has a good record in recent years of reducing average delays and the LAMP project is an example of how NATS is being proactive in order to avoid any future increase in delays. TAG Farnborough has been working with the LAMP team to ensure both proposals are coordinated.

Regarding traffic flying outside/beneath the proposed airspace, the changes proposed in Section 4 mitigate safety concerns raised by the aviation community (see paras 4.6-0).

The safety assurance (both within and beneath the proposed airspace) will be independently assessed by the CAA as part of their decision process. Their first duty is to ensure a safe aviation environment in the UK.

5.14 Is this proposal designed to allow air traffic levels to grow?

This proposal is designed to enable improvement of the operational and environmental efficiency of the wider airspace as a system.

Regulation of the growth of air travel in the UK is the responsibility of the CAA. NATS' responsibility is to plan for that growth UK-wide and to manage the wider air traffic system as a whole.

5.15 Will there be another consultation involving NATS? For how long would this proposal be operational?

Should these changes be approved they will remain in place for the foreseeable future. Airspace changes have no defined lifespan; they remain in place until further changes are required.

This change forms part of Phase 1 of the London Airspace Management Plan (LAMP). LAMP Phase 2 will involve further changes across the south and east of England, and may require further changes to some of the other routes over the south coast.

NATS will consult on any further changes in respect of LAMP Phase 2 when design work commences.

5.16 Why don't you wait until Phase 2 of LAMP to make these changes?

LAMP is phased, due to the complexity of the airspace. Phase 2 of LAMP is not expected until 2018/19. The changes we are proposing now would enable the operational and environmental benefits discussed in the consultation material to be realised in the four year period leading up to that time.

5.17 Have you taken into account the environmental impact of changes to other flight patterns, such as GA/S&RA¹⁴?

Flights by other airspace users do not follow easily-predictable tracks and may not be communicating with air traffic services. This makes it disproportionately difficult to make definitive statements about where current noise impacts occur due to these flights, and how that might change under this proposal.

As discussed in Section 4 above, this proposal would restrict the maximum flight levels of other airspace users to FL64 over parts of the south coast.

NATS contends that vertical restriction of these other airspace users to FL64 would not cause a noticeable noise impact to people on the ground over the coast or IOW (see paras 4.22-4.24 above).

Some airspace users may have specific VFR tasks that require additional height, beyond FL64. These users would need to relocate this task to areas where this height is available to them, with consequential changes in flight time and fuel use. We do not believe there are many users with this specific remit, and they are therefore unlikely to have a significant impact on the figures provided in the consultation material.

5.18 What impact would there be on military aircraft in these areas?

The Ministry of Defence responded with some queries about potential impacts on their operations. NATS has agreed mutually satisfactory procedures with the MoD regarding the volumes of airspace proposed here.

¹⁴ General aviation / sports & recreational aviation

6 **Summary and Conclusion**

- 6.1 NATS will now progress this South Coast Airspace Change Proposal separately from TAG Farnborough's proposal. TAG's consultation in 2014 (Ref 3) aimed to confirm and attain views on this proposal.
- 6.2 Anecdotal evidence from previous consultations has indicated that people who are negatively affected are more likely to respond than those who would benefit. Therefore consultation is not aimed at determining the popularity of a proposed design, nor is it a reliable proxy for determining popularity as responses are more likely to have a negative bias.
- 6.3 The analysis of responses has confirmed that the generic stakeholder concerns are as expected, and broadly in line with the environmental and operational requirements for airspace change laid out in the airspace change guidance.
- 6.4 Environmentally, NATS recognises that some areas would be overflowed more often under this proposal, but many more areas would be removed from over-flight. Stakeholders generically identified noise, tranquillity, fuel/emissions, local air quality and other quality of life issues, all of which are covered in the Government Guidance (Ref 1) which has been a consideration throughout the design process.
- 6.5 The analysis of responses highlighted no unique local characteristics to suggest that deviation from the guidance would be justified.

Regarding other airspace users

- 6.6 Analysis of the consultation responses (Ref 4) highlighted a number of relevant and actionable issues; specifically the use of the VFR recommended route, and funnelling/compression of other airspace users. This resulted in a partial redesign of the CAS (see Section 4).
- 6.7 The objectives for airspace change laid out by the CAA and the Government require us to consider the benefits and impacts as a complete package. NATS believes that the package of net operational and environmental benefits maintains or improves safety, has balance, and presents a compelling case for change.

7 **Next steps**

- 7.1 NATS will submit a proposal to the CAA in order to make the changes described in paragraph 1.10 above, as described in Parts C and D of the TAG Farnborough Consultation Document (Ref 3) and modified following consultation as per Section 4 above.
- 7.2 This submission is planned for 16th February 2015.
- 7.3 The CAA will consider the proposal against the requirements laid out in the guidance (Refs 1 and 2). We expect this assessment to take until Summer 2015 to complete.
- 7.4 Subject to CAA approval in Summer 2015, implementation is planned for late 2015 in line with LAMP Phase 1a (and may happen all at once or in stages).
- 7.5 Please note that once the proposal is submitted on February 16th, any further feedback should be provided directly to the CAA. The airspace change guidance provided by the CAA states that in the event that you wish to present new evidence or data, for consideration prior to their decision on the proposal, it must be submitted, in writing, to the following address:

LAMP South Coast Proposal

Group Director Safety and Airspace Regulatory Group

CAA House

45-59 Kingsway

London

WC2B 6TE

8 Appendix: References

1. Department for Transport Guidance to the Civil Aviation Authority on Environmental Objectives relating to the exercise of its Air Navigation Functions
DfT, Jan 2014
2. CAP725 CAA Guidance on the Application of the Airspace Change Process
CAA, Mar 2007
3. TAG Farnborough Consultation Material
Search the internet for 'farnborough airspace consultation'
or use the following link¹⁵: www.Consultation.TAGFarnborough.com

Consultation material is in six parts A-F
Feedback Report Part A will be joined by TAG's Part B equivalent in due course
TAG Farnborough, Feb-May 2014
4. TAG Farnborough Feedback Report Part A
Details as per Ref 3.
TAG Farnborough, Aug 2014

LAMP-related information

5. London Airspace Consultation Document and Feedback Reports
Link: www.londonairspaceconsultation.co.uk/?page_id=37
NATS and Gatwick Airport Ltd, Oct 2013-Mar 2014
6. London City Feedback Report
Link¹¹: www.londoncityairport.com/londonairspacemanagement
London City Airport Ltd, Feb 2015
7. NATS Departure Route Proposal at London Stansted Airport
Consultation Document
Link: www.nats.aero/lampstansted
NATS, Sep 2014

¹⁵ NATS is not responsible for the content of websites not directly controlled by us.
At the time of writing, all documentation was available for download.

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