

AIRPROX REPORT No 2026041

Date: 03 Apr 2026 Time: 1512Z Position: 5153N 00015W Location: 5NM E Luton

PART A: SUMMARY OF INFORMATION REPORTED TO UKAB

Recorded	Aircraft 1	Aircraft 2
Aircraft	A320	PA28
Operator	CAT	Civ FW
Airspace	Luton CTR	Luton CTR
Class	D	D
Rules	IFR	VFR
Service	ACS	ACS
Provider	Luton	Luton
Altitude/FL	FL017	FL017
Transponder	A, C, S+	A, C
Reported		
Colours	Company	White, Blue
Lighting	Landing, Nav, Strobe	Beacon, Nav, Landing
Conditions	VMC	VMC
Visibility	>10km	>10km
Altitude/FL	2000ft	1800ft
Altimeter	QNH	QNH (1007hPa)
Heading	253°	South
Speed	165kt	90kt
ACAS/TAS	TCAS II	Not fitted
Alert	Information	N/A
Separation at CPA		
Reported	0ft V/1NM H	Not Seen
Recorded	0ft V/0.4NM H	



THE A320 PILOT reports that, on initial approach, ATC informed the crew of a light aircraft holding to the north of the airfield - this was seen on TCAS. Later, the light aircraft was warned that it was getting close to the approach and was instructed to make a turn to the north. The light aircraft continued to track south, crossing in front of the A320 at approximately 2000ft, around 1 mile in front. TCAS blue (autopilot TCAS where it would [execute] the RA manoeuvre for the crew if triggered and when green) was armed but no TCAS RA was triggered. An uneventful landing followed.

The pilot assessed the risk of collision as 'Medium'.

THE PA28 PILOT reports that they were routeing [departure/arrival airfield] via the Luton overhead. they changed frequency to Luton 129.55MHz and asked for zone transit. A few minutes later they received the clearance to enter the Luton CTR not above 2000ft VFR and to remain 2 miles north of the airport. Later they were asked to change frequency to Luton Tower 132.550MHz, which they did. The controller asked them to remain 2 miles from the runway, which they understood to mean go around the runway by 2 miles, they read back this clearance as they had understood it, and no correction or amendment was provided by ATC. Then the controller asked them to proceed to the south, which they did. After landing they were asked to contact London Centre. It was explained that the instruction was to hold 2NM north of the runway. The pilot noted that they take airspace compliance and communication very seriously and have never had any issues [with] other controlled airspace, this was their first transit through Luton controlled airspace. They believed this situation may have arisen due to a misunderstanding during a period of high workload on the frequency, as ATC indicated they were busy at the time. Being made aware of the incident they self-reported the occurrence to the CFI at the Flying Club and raised an MOR on the CAA website.

They have reflected on this experience and recognise it as an important learning opportunity that will increase their situational awareness and further improve their flying and communications skills. They have also arranged additional training with their flying school, specifically focused on zone transit procedures and radio communication, to further strengthen their proficiency.

THE LUTON INT/FIN CONTROLLER reports that they were operating as the Instructor (OJTI) for a phase 8 trainee. Luton was in a bandboxed configuration (INT & FIN) landing RW25 with a strong north westerly wind. There was a group of around 4-5 inbounds arriving from both the south and north of the airfield and they had just successfully completed a VFR transit via the landing threshold with a C152 aircraft ahead of the first IFR inbound. [The PA28 pilot] called up on frequency during this flurry of aircraft asking for a transit of Luton's airspace. A squawk of 4671 was allocated and the QNH passed – there was some confusion initially with the callsign but this was quickly dealt with and corrected. The priority was safely dealing with the IFR sequence but the details of the VFR flight were obtained, the pilot was informed that their Mode C was not working/providing a readout on radar – the pilot provided a level of 2000ft and subsequently recycled it so it then showed the aircraft's level on radar which was cross checked for accuracy by means of a report of level again. An ident and standard VFR crosser was coordinated for [the PA28] with Luton Tower who elected to work this transit and so the details were passed over and a holding point of 2NM north of the airfield was requested and confirmed between the AIR and Radar controllers. The pilot was given a clearance of "Cleared to enter Luton controlled airspace, not above altitude 2000ft VFR, hold 2NM north of the airfield", which was subsequently read back by the pilot. They remember there being a few pauses and "umm" or "err" during the readback but, as this is fairly normal and the readback was correct and nothing was questioned, there was no cause for alarm at this point.

IFR pilots on final approach were informed of the fixed-wing aircraft entering controlled airspace to the north that would be holding 2NM north of the airfield. [The PA28 pilot] was informed as they entered Luton's Control Zone that it was a Radar Control Service, RW25 was in use and given Traffic Information about the 2 aircraft on final approach – one at 4NM and the next at 9NM. The clearance limit of 2NM north of the airfield was again passed to the transit pilot and they were transferred to the Tower frequency. At this point they were approximately abeam the VRP Offley, around 3NM north of the airfield. [The A320] was vectored onto final approach for RW25, cleared for an ILS approach and the VFR Traffic Information [the PA28] was passed alongside its expected holding point of 2NM north of the airfield not above 2000ft VFR. [The A320 pilot] was subsequently transferred to the Tower frequency. The transit flightpath [of the PA28] appeared to be deviating to the east, so as it approached 2NM north of the extended centreline/final approach a call was initiated to the Tower controller, who simultaneously rang on another line. A conversation was had between the two controllers agreeing that the pilot was not doing as informed or coordinated before the call was terminated. [The PA28] appeared to continue southeast-bound before turning southbound and tracking straight into the path of [the A320] on final approach, crossing in front of the [the A320] at the same level (around 1700ft) with around 0.5NM distance between the radar contacts.

They requested that the Tower controller transfer the [PA28 pilot] back to radar. After they checked in on frequency, [the Instructor] took over the R/T and tried to ascertain where the pilot believed they were cleared to initially as they had not appeared to route as they had been cleared. The pilot reported they were "routeing to [destination]" and after further querying the pilot reported being "unable to understand".

THE LUTON AIR CONTROLLER reports that Luton FIN called AIR to coordinate a standard VFR transit from the north, squawking 4671. Positive contact was made on the ATM and the details passed from radar. It was coordinated between the two parties for the transit aircraft [the PA28] to hold two miles north of the airfield and that AIR would work the transit across. Inbound aircraft were passed Traffic Information on the fixed-wing VFR traffic holding to the north. [The PA28] was seen to initially be holding to the north but not speaking to Luton AIR. Upon the AIR controller noticing that [the PA28] was beginning to drift to the east, they called FIN at the same time as [the PA28 pilot] checked in with AIR. [The PA28 pilot] on first contact was instructed to route northbound as they were observed tracking towards final approach and they were passed Traffic Information on the inbound [A320] to the east of them. Visual contact was made with both aircraft from the VCR. Updated Traffic Information was also

passed to the [A320 pilot] on the latest position of [the PA28]. A number of seconds passed and [the PA28] was seen to be continuing southbound. In order to deconflict them against the inbound A320, they were instructed to route southbound now. The inbound [A320 pilot] confirmed that the fixed-wing traffic was now south of them. After the preceding inbound had vacated, [the A320] was cleared to land and landed without further incident. [The PA28] was transferred to 128.750MHz when they were approximately 2 miles south of the approach and seen to be continuing southbound.

Factual Background

The weather at Luton was recorded as follows:

METAR EGGW 031450Z AUTO 24019G30KT 9999 BKN022 BKN026 14/10 Q1008=

Analysis and Investigation

NATS Investigation

Description of the event

The Luton Approach (GW APP) position was operating with the Intermediate and Final Director roles combined and was being undertaken by a controller under the supervision of an On-the-Job Training Instructor (OJTI). At 1458:47 the pilot of [PA28 C/S] from [redacted] intending to route via the Luton overhead, reported on the GW APP frequency to request zone transit.

The GW APP controller assigned a squawk of 4671 and passed the Luton QNH of 1008hPa to the pilot. After attending to other tasks, they returned to take details from the pilot of [the PA28], at 1502:55 instructing the pilot to remain outside controlled airspace and to expect onward clearance within 5min. The pilot promptly read back the instruction and maintained an orbit to the north of the Luton CTR.

The GW APP controller advised the pilot of [the PA28] that their Mode C information was not being received; the pilot reported that they were maintaining 2000ft and shortly afterwards the aircraft altitude information became displayed on radar.

The GW APP controller telephoned the Luton Air (GW AIR) controller at 1504:53 to co-ordinate zone transit for [the PA28]. The GW AIR controller requested to work the aircraft stating, *“just hold him two miles north then, VFR, and I’ll take him”*. The GW DIR responded, *“two miles north, field in sight and you’ll take”*.

At 1505:21 the GW DIR cleared the pilot of [the PA28] *“to enter Luton Controlled Airspace, VFR, not above two thousand feet, hold two miles north of the airfield”*. The pilot responded, *“approved to enter, err, um, the zone, err, not above two thousand feet, keep two miles from the airfield”*, see Investigation section.

The GW APP controller verified the Mode C information of [the PA28], with the pilot reporting an altitude of 1800ft. The controller issued a Basic Service, which was promptly acknowledged by the pilot. [The PA28] commenced a southerly track towards the Luton CTR, and the GW APP controller returned to issuing instructions to multiple arriving aircraft in the approach sequence.

This arrival sequence included two aircraft established on final approach to RW25 ([two non-Airprox aircraft]) followed by an A320 arriving from the northeast as shown in Figure 1. At 1506:55, the GW DIR passed Traffic Information on the position of [the PA28] to the pilot of [the second non-Airprox aircraft], informing them that the aircraft was *“just entering the zone from the north, will be holding two miles north of the field, working the Tower”*. Note: [The PA28 pilot] was still established on the same frequency.

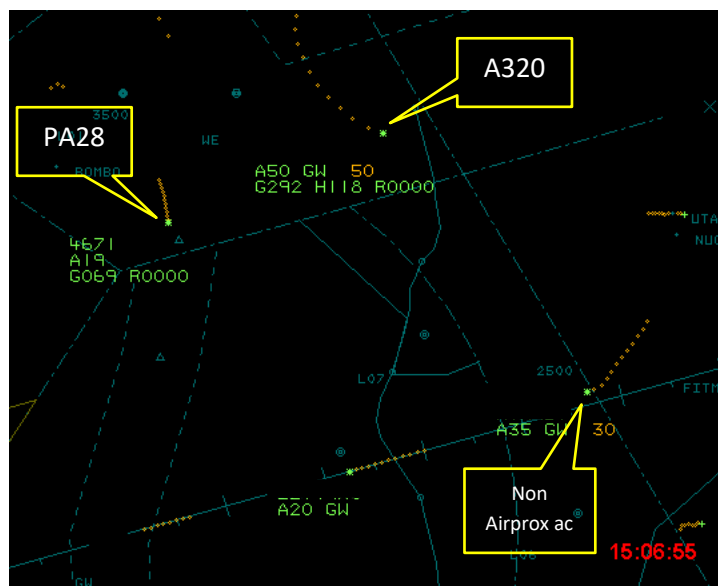


Figure 1 – Node display

At 1507:07 the pilot of [the PA28] was informed *“you’re just entering the zone, Radar Control, we are landing Runway 25, there is landing traffic currently on a four-mile final and also on a nine mile final”*. The pilot responded, *“enter the zone, service control, copied all the traffic info, [C/S]”*.

The GW APP controller issued a base heading and descent clearance to the pilot of [the A320] and transferred [the non-airprox aircraft] to the GW AIR frequency, then at 1507:42 requested the pilot of [the PA28] to report when they had the airfield in sight, with the pilot responding *“wilco, [C/S]”*.

The pilot of [the A320] was issued a heading and clearance for the ILS for RW25 then, at 1508:35, the GW APP controller instructed an inbound speed restriction and advised *“Traffic Information, there’s a VFR fixed-wing currently three miles north of the airfield, will be holding two miles north, working the Tower”*, adding that this traffic would be operating not above 2000ft.

At 1509:09 the GW APP controller queried whether the pilot of [the PA28] had the airfield in sight and, after receiving confirmation, reiterated the earlier clearance stating, *“hold two miles north of the field, contact Tower one three two decimal five five five, callsign only”*. The pilot read back the frequency change at 1509:24 (Figure 2), 3.8NM northeast of the airfield, but omitted to read back the repeated hold confirmation and read back the frequency as *“one three two decimal five five”* which was not challenged.

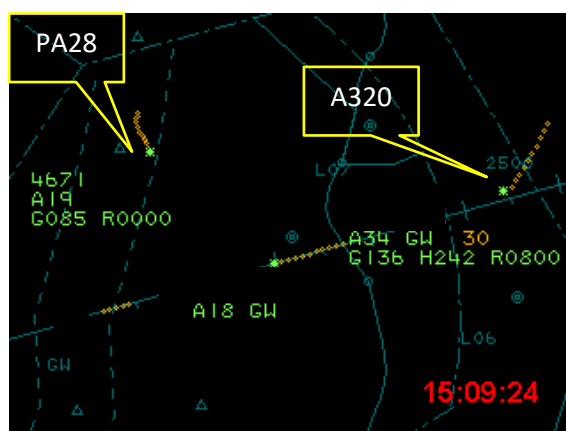


Figure 2

At 1509:43 the GW APP controller informed the pilot of [the A320] that they were No2 to land and instructed them to contact the GW AIR frequency.

Up to this time, all actions by the pilot of [the PA28] had been in accordance with the controllers' expectations and plans. The OJT reported recognising that *'The transit flightpath appeared to be deviating to the east so as it approached 2NM north of the extended centreline/final approach a call was initiated to the Tower controller who simultaneously rang us on another line.'*

The pilot of [the PA28] reported onto the GW AIR frequency during this call, at 1510:29 (Figure 3) when 3NM northeast of the airfield (1.5NM north of a 3NM final). The GW AIR controller advised the GW APP controller that the pilot had just made contact, and both controllers agreed that the pilot was not acting as instructed.



Figure 3 – GW Aerodrome Traffic Monitor (ATM). Note that the ATM image is displayed with north-south reversal to match the Luton tower orientation.

The GW AIR controller acknowledged at 1510:38 “[PA28 C/S], *Luton Tower, hello, continue to hold to the north please, you’re looking like you’re currently drifting towards the approach. Route northbound now please*”. The pilot responded at 1510:47 “*Northbound, [C/S]*”. Mode C indicated that [the PA28] then descended to 1700ft.

A white (low level) Short Term Conflict Alert (STCA) on the TC NODE system was displayed between [the PA28] and [the A320] at 1510:53.

Despite reading back the instruction to turn north, the pilot of [the PA28] continued to track southeast towards the final approach track. At 1510:56, the GW AIR controller transmitted “[A320 C/S], *Traffic Information, in your one o’clock, range three miles, they will be routeing northbound*” to which the pilot responded that they had the traffic in sight.

The GW AIR controller continued at 1511:06 “[PA28 C/S], *Traffic Information, two miles to the east of you is an inbound [company] A320*” to which the pilot responded at 1511:13 (Figure 4), “*looking for traffic, [C/S]*”. The NODE STCA alert increased to red (high level) as this was issued.



Figure 4

The GW AIR controller acquired visual contact with both [the PA28] and [the A320] and recognised that [the PA28 pilot] was not making a northerly turn. The [controller's report] explained 'As [the PA28] continued towards the extended centreline the AIR controller decided the best course of action would be to instruct the aircraft to route south as heading north would cause further problems'. This instruction was issued to the pilot of [the PA28] at 1511:23.

[The PA28] proceeded to cross the final approach track at 1511:31 at an altitude of 1700ft, approximately 0.9NM ahead of [the A320]. The closest point of conflict occurred at 1511:51 and was recorded on Multi-Track radar as 0.4NM and 0ft with [the PA28] tracking south of the approach track (Figure 5).

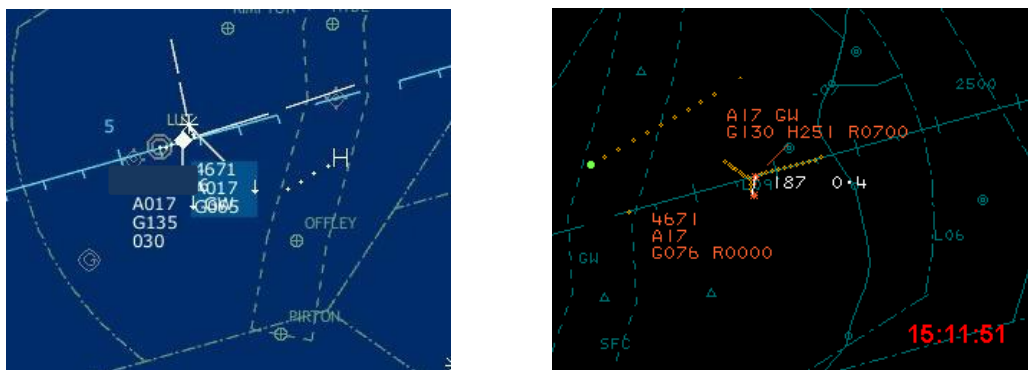


Figure 5 - Closest point of conflict between the PA28 and the A320 as displayed on the GW ATM (left) and NODE radar (right).

The pilot of [the A320] continued their approach and did not report any change of profile.

At 1511:52 the GW AIR controller telephoned the GW APP controller, and it was agreed that [the PA28] would be transferred back to the GW APP frequency continuing on a southerly track.

The pilot of [the A320] informed the GW AIR controller at 1512:01 *"just to let you know that traffic is now to the south. He's pretty much just gone through the localiser and ILS"*. The pilot of [the A320] continued to make a successful landing.

After returning to the GW APP frequency, the OJTI questioned the pilot of [the PA28] regarding where they had been heading to take up the instructed hold. The pilot responded "err, towards [destination], err, south". The OJTI clarified that the clearance had been to hold 2NM north of Luton, to which they replied *"um, sorry, misunderstanding, sorry about that"*.

Investigation

VFR clearance

Coordination between the GW APP and GW AIR controllers agreed a '*Standard VFR*' transit for [the PA28]. This pertained to established procedures contained in the respective unit MATS Part 2's, which included detail of standard routes, altitudes, holding points and transfer of communication agreements to facilitate the integration of VFR crossing traffic with IFR departures/arrivals. For traffic transiting from the north requiring delaying action, the procedure prescribed that aircraft were instructed to hold '*no closer than 2NM to the north of the runway*'.

The procedure further noted:

Note: It is understood that VFR aircraft instructed to hold 2nm north of the runway or at Hyde, may move closer than these points whilst in an orbit. These limits are not intended to be fixed points, instead they provide a reasonable distance that permits effective integration with IFR arrivals and departures.

Consequently, this flexibility afforded to VFR traffic meant that it was not immediately apparent to either controller that the pilot of [the PA28] was not holding as expected or previously cleared. The aircraft radar track initially indicated a slight easterly deviation at the point where an appropriate hold would commence, potentially impeding the controller's ability to recognise the developing scenario. The NATS4118 detailed '*when referring to the ATM [the GW AIR controller] thought that [the PA28] had started to take up an orbit 2NM north as agreed, however realised within seconds that this wasn't the case.*'

GW APP

The OJTI reported sector workload to have been moderate, comprising a group of 4-5 inbounds from both the north and south to RW25. An unrelated aircraft had completed a similar VFR transit immediately prior to the event. The frequency was moderately busy with transmissions to aircraft at various stages of the approach, and Traffic Information both on and to the pilot of [the PA28], providing good opportunity for pilots to build and maintain situational awareness. Evidence that the pilot of [the PA28] was maintaining a good listening watch was displayed in their prompt response to instructions and which, prior to the event, had been carried out correctly.

The submitted report from the pilot of [the PA28] detailed:

'I received clearance to enter the Luton CTR not above 2000 feet VFR and to remain 2 miles North of the airport. Later I was asked to change frequency to Luton Tower 132.550, which I did. The controller asked me to remain 2 miles from the runway, which I understood to mean go around the runway by 2 miles.'

With hindsight, it is evident that the pilot of [the PA28] had developed an incorrect mental model, believing they had been cleared to cross the final approach track. The GW APP controller had delivered the instruction to hold 2NM north of the airfield clearly and in accordance with CAP493 phraseology, however the pilot of [the PA28] responded "*keep two miles from the airfield*".

Whilst this discrepancy in readback was noted in post incident analysis, it was not recognised by either the GW APP controller or OJTI as having being significant at the time and indeed in line with usual pilot responses. The OJTI reported '*I remember there being a few pauses and "umm" or "err" during the readback but as this is fairly normal and the readback was correct and nothing was questioned there was no cause for alarm at this point.*'

Previous communications with the pilot had been timely and correct, including holding to remain outside controlled airspace, reinforcing the perception that the pilot understood the clearance.

Safety Investigations assessed that not challenging this incomplete readback allowed the error state to continue.

The TC Unit Competence Manager (UCM) reviewed both radar and RT recordings from the event. They acknowledged that, through the lens of hindsight, had the pilot's subsequent omission been challenged, any developing pilot incorrect mental model could have been arrested. However, the UCM emphasised that this event should be considered in context of the circumstances at the time; both the GW APP controller and OJTI perceived that the clearance was within appropriate parameters to indicate correct pilot understanding, and all other interactions with the pilot had been normal – including prompt response to all communication, holding clear of controlled airspace as instructed and attending to their Mode C transmission. This was not indicative of a scenario of potential concern or requiring additional attention or clarification around pilot intentions.

It should further be noted that there had been Traffic Information passed to [non-Airprox aircraft] and later separately to [the A320 pilot] reference [the PA28] holding 2NM north of Luton whilst [the PA28 pilot] was established on the same frequency and the GW APP controller had further reiterated the instruction to the pilot to hold 2NM north of the airfield during the transfer of [the PA28 pilot] to GW AIR; however, this reiteration was not acknowledged by the pilot.

The perception of the GW APP sector team was that the instruction to hold had already been read back correctly, understood clearly, and no other clearance to the contrary had been issued, therefore they maintained the expectation that [the PA28 pilot] would hold as instructed. Again, the lack of appropriate challenge to this omitted readback allowed the error state to continue.

GW AIR

The GW AIR controller described that they had utilised predicted track lines on the ATM to aid their assessment of an appropriate gap for [the PA28] to cross. They commented that as [the PA28] entered the zone, they had noticed its slow speed given the wind conditions and determined that it was appropriate to utilise the large gap behind [the A320] to facilitate the transit.

The GW APP controller had previously issued the frequency change to GW AIR when [the PA28] was 3.5NM northwest of Luton, a normal point for transfer of communication to take place to enable sufficient time for communication to be established prior to a transiting aircraft taking up the hold or to be issued onward clearance. After reading back the new frequency, 65sec elapsed before the pilot of [the PA28] contacted the GW AIR controller. This delay impeded the opportunity for the GW AIR [controller] to identify the pilot's incorrect perception, although they had already detected that [the PA28 pilot] was not operating in accordance with expectation and immediately issued a corrective instruction to head north.

The pilot of [the PA28] did not reference any instruction to turn north in their subsequent report; although the frequency recording identified that they had read this back correctly at the time, the pilot did not appear to act upon the instruction, see pilot reports section.

The GW AIR controller, who had established visual contact with [the PA28], provided Traffic Information to the pilots of both aircraft. In accordance with CAP413, cardinal points were referenced to the pilot of [the PA28] as the aircraft was anticipated to be in a turn. The pilot of [the PA28] responded that they were "*looking for traffic*", however in their subsequent report stated that they had not sighted the conflict.

The position of [the A320] was consistent with the information provided by the GW AIR controller and, considering the proximity in VMC, would reasonably be anticipated to easily acquire. In addition to the pilot erroneously continuing a southerly track, this may be indicative of them becoming disorientated, potentially focussed on the airfield to their right where the preceding aircraft was almost landing, and not being sufficiently situationally aware to identify the conflicting traffic on their left.

The GW AIR controller did not issue avoiding action to either pilot; this was in accordance with their responsibilities in relation to the Luton CTR (Class D) as detailed in CAP493 Section 1 Chapter 2:

- (a) Separate IFR flights from other IFR flights;
- (b) Pass traffic information to IFR flights and SVFR flights on VFR flights and give traffic avoidance advice when requested;
- (c) Pass traffic information to VFR flights on all other flights and provide traffic avoidance advice when requested.

Whilst instructing the pilot of [the A320] to carry out a missed approach may have provided opportunity to increase the distance between the aircraft, the GW AIR controller stated: *'I considered instructing [the A320] to go around but the proximity of the aircraft meant that wake turbulence could have been an issue for [the PA28]. I issued Traffic Information to both aircraft with the intention this would alert [the PA28 pilot] to the [the A320] and they would then turn north. However, [the PA28 pilot] continued south so I instructed [the PA28 pilot] to continue south as I assessed they would still be able to cross ahead of [the A320].'*

Pilot reports

PA28 - The pilot provided a report following the event, detailing that their planned route had [redacted] via the Luton overhead, noting that this was their first transit of Luton controlled airspace and that, reference the conflict, it had been 'Not seen'.

The pilot subsequently visited Luton airfield approximately three months after the event and in conversation detailed they had previously transited the Luton CTR and that when they had initially received the clearance to hold two miles north of the field, they had misinterpreted this clearance as to remain two miles from the airfield.

The pilot of [the PA28] further explained that when the Tower controller had instructed them to route northbound, they had not actioned this as the pilot still believed they were acting correctly by remaining two miles away from the airfield and at this point they had perceived they were nearly through the centreline of RW25. When the Tower controller issued Traffic Information, the pilot of [the PA28] stated they were visual with the [A320] but they had not confirmed this on the R/T.

Note: The above pilot descriptions contained several discrepancies between the initial pilot report and later recollection, primarily around the pilot perception and mental model.

Conclusions

The GW APP controller issued VFR clearance to the pilot of [the PA28], undertaking their first transit of Luton controlled airspace, to enter the Luton CTR and hold 2NM north of the airfield.

The pilot of [the PA28] readback *"keep two miles from the airfield"*. The GW APP controller and OJTI assessed the pilot readback demonstrated correct understanding of the clearance and the pilot's post event report initially supported that this had been the pilot understanding; however, subsequent pilot conversation at Luton detailed this may not have been the case. The pilot of [the PA28] developed an incorrect perception that their clearance permitted them to cross the final approach track remaining 2NM from the runway. The partial clearance readback omitting the element of *"hold 2 miles north"* was not challenged by the GW APP controller, allowing this perception to continue.

Subsequent to the clearance being issued, Traffic Information was provided to the pilot [of the PA28] regarding traffic on final approach, and two IFR arrivals were advised that the VFR aircraft would be holding 2NM north of the airfield whilst the pilot of [the PA28] was on the same frequency, providing further opportunities for all parties to establish and maintain situational awareness.

When transferring the pilot of [the PA28] to the GW AIR frequency, the GW APP controller reiterated the instruction to hold 2NM north of the airfield; however, this was not acknowledged by the pilot and the GW APP controller again did not challenge this omitted readback.

The pilot of [the PA28], in the period of being absent from either frequency, continued towards the extended centreline of RW25 where [the A320] was established on final approach.

The GW AIR controller instructed the pilot of [the PA28] to turn north and provided Traffic Information to the pilots of [the PA28] and [the A320]. The GW AIR controller had then established visual contact with both aircraft and recognised that [the PA28 pilot] was not turning as instructed.

The pilot's non-compliance with this recovery action resulted in the GW AIR controller requiring to re-assess the scenario. Based on the geometry that had now developed with [the A320], a turn to the north by [the PA28] was assessed to likely increase the conflict severity, compared to maintaining a southerly track. The GW AIR controller also considered that issuing a missed approach to [the A320] could create hazardous wake turbulence for the PA28. Assessing sufficient spacing existed for [the PA28] to pass ahead, they instructed the pilot to continue south.

The [PA28] crossed the final approach track 0.9NM ahead of [the A320], with a minimum distance recorded between the aircraft of 0.4NM and 0ft. The pilot of [the PA28] in later communications detailed that they had been visual with [the A320]. The pilot of [the A320] reported visual contact with [the PA28], and that no TCAS Resolution Advisory was generated.

Recommendations

Details of the event were discussed with Centre's Safety Improvement Team (CSIT) and TC Unit Competence Manager. Work is being undertaken regarding interactions between IFR and VFR traffic within Class D airspace, and it is proposed that this event forms the basis of an incident brief to highlight potential VFR pilot misperceptions.

There were two Safety Investigations recommendations as a result of this Investigation:

- a. An Airprox occurred when a VFR pilot misinterpreted an instruction to remain 2NM north of Luton, resulting in conflict with IFR traffic on final approach.

It is recommended that suitable VRPs be identified or established for holding transiting VFR traffic prior to crossing the Luton final approach track, reducing potential for ambiguous pilot interpretation and supporting Tower and Approach controllers in maintaining safe integration of IFR/VFR traffic.

- b. A VFR pilot exceeded the instructed holding position during a Luton zone transit, resulting in an interaction with IFR aircraft on approach.

It is recommended that coordination procedures between Luton Approach and Tower establish clearly defined frequency transfer points. This would support controllers' ability to monitor compliance and implement timely corrective action when required.

CAA ATSI

CAA ATSI noted that the NATS investigation covered the salient points, specifically relating to the lack of challenges to incorrect or missing readbacks by the PA28 pilot. They also wished to highlight the following from CAP413, which relates to one of the missed readbacks at 1509:24, when an instruction to hold 2 miles north was combined with a frequency change instruction:

CAP413 Chapter 2 – Transfer of Communications:

2.59 Transfer of communication instructions should be passed in a single message. Items which require a read-back should normally be passed in a separate transmission before transfer.

UKAB Secretariat

The A320 and PA28 pilots shared an equal responsibility for collision avoidance and not to operate in such proximity to other aircraft as to create a collision hazard.¹

Summary

An Airprox was reported when an A320 and a PA28 flew into proximity 5NM east of Luton at 1512Z on Friday 3rd April 2026. The A320 pilot was operating under IFR in VMC in receipt of an ACS from Luton Air, and the PA28 pilot was operating under VFR in VMC also in receipt of an ACS from Luton Air.

PART B: SUMMARY OF THE BOARD'S DISCUSSIONS

Information available consisted of reports from both pilots, radar photographs/video recordings, reports from the air traffic controllers involved and reports from the appropriate operating authorities. Relevant contributory factors mentioned during the Board's discussions are highlighted within the text in bold, with the numbers referring to the Contributory Factors table displayed in Part C.

The Board first looked at the actions of the A320 pilot. They had been on the ILS to Luton and had been given Traffic Information on the PA28; the controller had told the A320 pilot that the PA28 would be holding 2NM north of the runway. Members familiar with flying the A320 noted that, when flying with the TCAS in the Auto setting, pilots would be expected to leave any avoiding action to the TCAS because the TCAS algorithm would take into account all traffic in the area, not just the traffic that the pilot may be visual with. That being said, the A320 pilot had reported that the TCAS indication had been blue, which equated to information only and that the TCAS had not calculated the PA28 to be a threat at that time. Thus the A320 pilot had been coupled on the ILS and able to watch the situation unfold in front of them, fully confident that they had time to take action should it have been required. Although the A320 pilot had been told that the PA28 pilot would be holding 2NM north, the pilot had justifiably become concerned when they had seen that the PA28 pilot had not adhered to the ATC clearance and had crossed the approach lane ahead of them (**CF14**).

Members then turned to the actions of the PA28 pilot. The PA28 pilot had called Luton in good time for their crossing of the Luton CTR and had followed various instructions to change squawk and recycle their Mode C prior to entering controlled airspace (CAS). However, once they had been given their clearance to enter the CTR, they had not read back the clearance exactly as issued (**CF11**). The pilot reported that they had been confused by the clearance, believing it to mean that they were to remain 2NM from the runway, and members wondered whether the pilot had diligently planned their route prior to getting airborne, including understanding the procedures for crossing the Luton CTR (**CF9**). Members noted that the pilot had not read back the Tower frequency correctly and that this had probably caused the delay when switching from the Approach frequency to Tower, which had been 65sec. Prior to instructing the pilot to change frequency, the controller had reiterated the clearance to hold 2NM north of the airfield, but the pilot, potentially overloaded by this point, had still not assimilated what that clearance had meant (**CF8**) and had continued to route towards the approach lane (**CF7**). Once the pilot had eventually called on the Tower frequency, the Tower controller had realised that the PA28 had drifted further southeast than the controller would have expected, and they instructed the pilot to turn northbound. The PA28 pilot had read back that they would, but had not done so (**CF6**, **CF10**); instead, they had again deviated from their clearance (**CF5**) and continued south (**CF7**). The PA28 pilot had been given Traffic Information on the A320 twice, once by the Approach controller and once by the Tower controller, but had not assimilated what that Traffic Information had meant (**CF12**). Members also noted that the A320 pilot had been given Traffic Information on the PA28 whilst the PA28 pilot had been on the same frequency, which included the phrase '*they will be holding 2NM north*', and when on the Tower frequency that they would be routing northbound, but that the PA28 pilot had apparently not heard this, or had not realised that it had referred to their aircraft. Members lamented the missed opportunity for the PA28 pilot to have realised their error. Although contained within the NATS investigation was information that the PA28 may have been visual with the A320, in the pilot report provided to the UKAB, the PA28 pilot had stated that they had not seen the A320 (**CF13**). Whilst the

¹ (UK) SERA.3205 Proximity.

Board could not determine which had been correct, they thought that it had not affected the outcome, given that the A320 pilot had been visual throughout and had not needed to take avoiding action.

The Board thought it worth highlighting a number of learning points as best practice for GA pilots:

- Listen VERY carefully to any crossing clearance.
- If you do not understand any instruction, or it is unfamiliar, then ask for clarification.
- Read back all clearances verbatim – have a pen and paper ready. Then listen to ATC readback – if there are any discrepancies, or lack of understanding, then challenge.
- Listen for further instruction, be aware that if it is Radar Control, you should expect instructions at any phase.
- On receipt, action immediately (after making sure it is safe to do so).

The Board then discussed the actions of the Luton controllers. Members were told that the pilot's readback of the clearance, whilst not exactly as given to the pilot, had been close enough that the Approach controllers (a trainee and an OJTI) had assessed that the pilot had understood the limit of the clearance to be to hold 2NM north of the airfield. In mitigation, controlling members noted that lived experience indicated that it was common for pilots not to read back a clearance exactly as given and, when controllers are busy (as they were in this case), it is common practice to accept something that is deemed close enough. However, although members recognised that they had the benefit of hindsight, in this case, had the controller insisted on a word perfect readback, and the pilot had read back 'hold 2NM north' rather than "*keep 2 miles from the airfield*", then the pilot may have understood their mistake (**CF1**, **CF2**). Once the PA28 pilot had switched to the Tower frequency, after the delay before checking in, the Tower controller could see that the pilot had not been acting in accordance with their clearance and had not been where they had expected the aircraft to be (**CF3**). They had tried to get the PA28 pilot to turn back northbound, which the pilot had not carried out, despite reading back the instruction correctly, and members agreed that the change of instruction to route southbound and out of the way had been the correct action. The Board also noted that the PA28 pilot's action of crossing the extended centreline in front of the approaching A320 had caused the STCA to alert (**CF4**), but that the controllers had already been engaged in trying to resolve that specific conflict. Members were told that, since this incident, pilots wishing to cross the Luton CTR are now given a specific holding point outside CAS but that, because it is further away, it is more difficult for controllers to get aircraft across the approach lane expeditiously, causing longer hold times for pilots wishing to cross the Luton CTR, and that during busy times VFR crossings are refused completely.

The Board further discussed the level of RT discipline amongst pilots, noting that the inaccurate readback from the PA28 pilot had been fundamental in the lead-up to the Airprox, but acknowledging that controllers dealt with such poor RT standards on a daily basis. Members therefore thought that it would be worthwhile to make a recommendation that:

The CAA considers a review of the impact on flight safety of poor or non-standard RT phraseology within UK airspace.

When determining the risk, members considered the reports from both pilots and the controllers, together with the radar replay screenshots. They noted that, although it had been likely that the PA28 pilot had not seen the A320, the separation had been such that the geometry had not triggered the TCAS in the A320. Whilst it was agreed that there had not been a risk of collision, members decided that safety had been degraded by the PA28 pilot not adhering to their clearance; Risk Category C.

PART C: ASSESSMENT OF CONTRIBUTORY FACTORS AND RISK

Contributory Factors:

	2026041			
CF	Factor	Description	ECCAIRS Amplification	UKAB Amplification
	Ground Elements			
	• Regulations, Processes, Procedures and Compliance			

1	Human Factors	• ATM Regulatory Deviation	An event involving a deviation from an Air Traffic Management Regulation.	Regulations and/or procedures not fully complied with
• Situational Awareness and Action				
2	Human Factors	• ATM Personnel Hear back	An event involving the hearback (listening) of ATM personnel to communications	
3	Contextual	• Traffic Management Information Action	An event involving traffic management information actions	The ground element had only generic, late, no or inaccurate Situational Awareness
• Electronic Warning System Operation and Compliance				
4	Technical	• STCA Warning	An event involving the triggering of a Short Term Conflict Alert (STCA) Warning	
Flight Elements				
• Regulations, Processes, Procedures and Compliance				
5	Human Factors	• Flight Crew ATC Clearance Deviation	An event involving a deviation from an air traffic control clearance.	
• Tactical Planning and Execution				
6	Human Factors	• Accuracy of Communication	Events involving flight crew using inaccurate communication - wrong or incomplete information provided	Ineffective communication of intentions
7	Human Factors	• Action Performed Incorrectly	Events involving flight crew performing the selected action incorrectly	Incorrect or ineffective execution
8	Human Factors	• Insufficient Decision/Plan	Events involving flight crew not making a sufficiently detailed decision or plan to meet the needs of the situation	Inadequate plan adaption
9	Human Factors	• Pre-flight briefing and flight preparation	An event involving incorrect, poor or insufficient pre-flight briefing	
• Situational Awareness of the Conflicting Aircraft and Action				
10	Human Factors	• Flight crew response to communications	An event related to the flight crew taking the incorrect action following communication	
11	Human Factors	• Readback Incorrect	An event involving incorrect readback	
12	Human Factors	• Understanding/ Comprehension	Events involving flight crew that did not understand or comprehend a situation or instruction	Pilot did not assimilate conflict information
• See and Avoid				
13	Human Factors	• Monitoring of Other Aircraft	Events involving flight crew not fully monitoring another aircraft	Non-sighting or effectively a non-sighting by one or both pilots
14	Human Factors	• Perception of Visual Information	Events involving flight crew incorrectly perceiving a situation visually and then taking the wrong course of action or path of movement	Pilot was concerned by the proximity of the other aircraft

Degree of Risk: C.

Recommendation: The CAA considers a review of the impact on flight safety of poor or non-standard RT phraseology within UK airspace.

Safety Barrier Assessment²

In assessing the effectiveness of the safety barriers associated with this incident, the Board concluded that the key factors had been that:

Ground Elements:

Regulations, Processes, Procedures and Compliance were assessed as **partially effective** because ATC did not obtain an accurate readback of the clearance from the PA28 pilot.

² The UK Airprox Board scheme for assessing the Availability, Functionality and Effectiveness of safety barriers can be found on the [UKAB Website](#).

Situational Awareness of the Confliction and Action were assessed as **partially effective** because ATC had not obtained an accurate readback of the clearance from the PA28 pilot and therefore expected the pilot to hold 2NM north of the airfield, but the pilot instead transited through the approach lane.

Electronic Warning System Operation and Compliance were assessed as **effective** because the STCA alerted.

Flight Elements:

Regulations, Processes, Procedures and Compliance were assessed as **ineffective** because the PA28 pilot did not follow the ATC clearance.

Tactical Planning and Execution was assessed as **ineffective** because the PA28 pilot did not follow the ATC clearance to hold 2NM north of the airfield and, when instructed to turn north by the Tower controller, although the pilot reported that they would, they continued on a southerly heading.

Situational Awareness of the Conflicting Aircraft and Action were assessed as **ineffective** because the PA28 pilot did not assimilate the Traffic Information that the A320 was on the approach, and continued on their southerly track.

