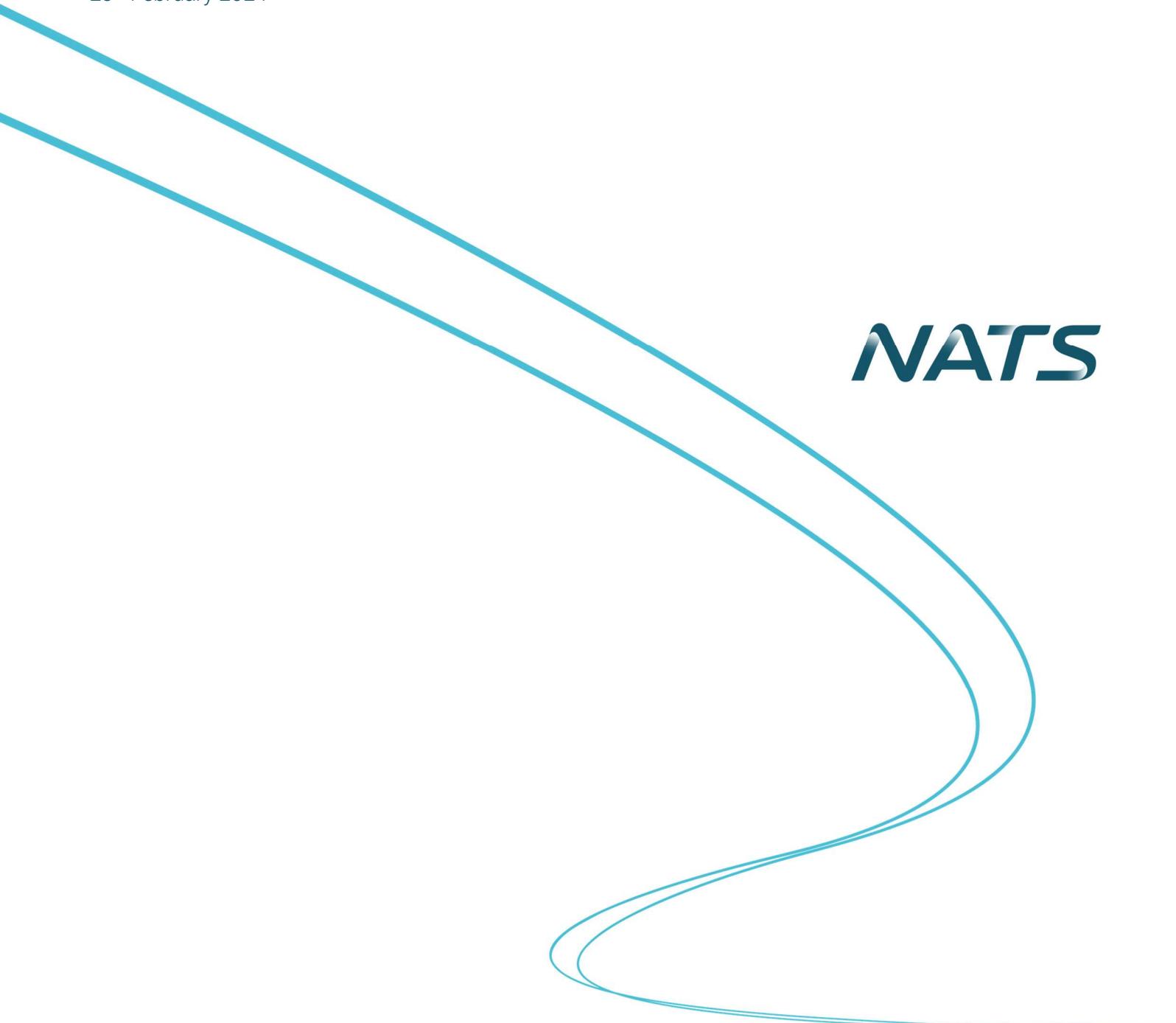


# Project Palamon: Progress Update - February 2024

23<sup>rd</sup> February 2024

***NATS***

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## Context

In response to the CAA's Final Decision on Project Palamon (CAP2100)<sup>1</sup>, and as recommended by the CAA, we committed to provide six-monthly updates on the actions being progressed to address the seven recommendations set out in the Final Decision. This is the fifth update to the CAA.

## Summary of Progress

In its formal response to the CAA (August 2021), NATS (En Route) PLC (NERL) committed to increase staffing resilience of services within the London Terminal Manoeuvring Area (TMA), by increasing both the headcount and number of validations held by controllers and to identify ways to deploy them in a more flexible manner and to train them more efficiently. This update sets out the good progress that has been made in these areas. NERL has also provided an updated staffing resilience plan (January 2024) including an updated view of supply and demand.

Our training programme has delivered an increase in controllers and validations, with a 16% increase in validations and 13% increase in controllers since summer 2019. We have also seen improvements in training efficiencies and in standardising and simplifying procedures for operating the Approach functions.

To respond to the expectation in the CAA's NR23 Final Decision relating to coding of air traffic control delay, we have now proposed<sup>2</sup> and agreed with the CAA additional reporting in the quarterly Condition 11 report as part of the Service Standards Statement Consultation for 2024 onwards. This new delay coding proposal is now part of our regular Service Standard Statement reporting. We discuss the details of the new air traffic control delay coding in Section 4 of this document.

<sup>1</sup> CAA (2021), Investigation under s.34 of the Transport Act 2000: Project Palamon – Final Decision, CAP 2100

<sup>2</sup> NERL response to CAA NR23 Provisional Decision, CAP2553 (4 August 2023)

# Update on the Recommendations

## 1 Staffing Resilience

### Summary

Our training programme continues to deliver both new controllers and additional validations into Terminal Control (TC) Approach. At the end of January 2024, the number of validations supporting the approach control functions of the London airports [compared to summer 2019] were: Heathrow 45 [43], Gatwick 38 [30], Stansted 35 [26], Luton 32 [24] and London City 29 [31]. These validations are held across 129 valid controllers. Together this amounts to a 16% increase in validations and 13% increase in controllers since summer 2019.

In addition to increasing headcount and validations, we have continued to enhance resilience by developing initiatives under the themes of training efficiency and flexible deployment of resource.

Our latest projections of ATCO supply and demand in Swanwick TC Terminal Manoeuvring Area and Approach are set out in the Staffing Resilience Plan 2024, which is submitted alongside this Palamon update.

Please see below further detail on our progress since August 2023.

### Training efficiency

We had previously identified potential efficiencies which might be secured in training ATCOs on the Stansted and Luton approach together, given the greater similarities in operation of each following the SAIP-AD6 airspace change in Essex, implemented in February 2022. Training learners on both Stansted and Luton approach has, however, proved to be not as effective as initially anticipated. The amount of information and skills which learning two sectors simultaneously required was a significant challenge for a first validation. As a result, one of the initial cohort did validate on both sectors while the others focused on a single validation. All but one are now valid. The training they have completed will be an advantage as they extend on to their second validation. In addition to this cohort, two learners initially training for Heathrow have moved across to train on Stansted and Luton. These are both expected to validate and further improve resilience. The recent and anticipated validations, along with the implementation of AD6 has had a positive impact on staffing. Training initial and extension validations will continue across both skills.

NERL continues to consult with the CAA regarding the recognition of non-UK based ATC training, which would enable recruitment of ATCOs from outside the UK. In addition, discussions have begun between stakeholders on the future of UK Military ATC training and the conversion to Civil Aviation.

### Flexible Deployment of Resource: Standardisation of Procedures

Work has continued to standardise and simplify the procedures for operating the approach functions. These procedures are beneficial for enabling controllers to train for additional sector validations more easily. Notable progress is detailed below.

Through ongoing collaboration between Stansted tower and the NERL ATM procedures team, it has been agreed that supplementary instructions will be issued by both the approach sector and the tower with alignment updates to both operations' MATS Part 2 by the end of March 2024. To date over two thirds of the terminal control Stansted MATS Part 2 has been aligned with the tower.

As noted in our previous updates, a significant area of alignment has concerned the handling of Visual Flight Rules (VFR) crossing traffic which has varied across the different units and had been identified by our training teams as one of the most challenging aspects of cross training the approach sectors. Progress was made as planned for Luton, which following an extended evaluation through summer 2023, was made permanent at the end of September 2023. Stansted's procedure evaluation has been extended and is planned to become permanent during April 2024. The efforts outlined above for VFR crossing and other simplifications to procedures continue to simplify the cross-training of ATCOs to other approach functions by ensuring commonality of procedures where appropriate.

### Flexible Deployment of Resource: Operational staff deployment

A portfolio of activities continues to be prioritised across the business to provide further mitigation for both supply and demand risk in the coming years across NERL operations. These have been split between activities and initiatives for summer 2023 and those targeting delivery of benefit throughout the remainder of the NR23 period.

For summer 2023, steps were taken to ensure that the operation remained able to deliver to its commitments including the service performance targets. These included, but were not limited to:

- > removal of non-operational activity from peak periods, where possible
- > non-operational ATCOs with operational skills offering double the number of operational shifts than the minimum required to maintain their validations
- > reduction in night shift coverage on some sectors to enable increased daytime resilience
- > return of some flexible workers with time-limited contracts to full-time hours during the peak season
- > external recruitment of ATCOs.

Collectively these measures provided additional attendances into the operation during summer 2023 equivalent to approximately 18 full-time staff.

As well as further refining and embedding some of these initiatives, we have reached agreement with the Prospect trade union around the provision of additional attendances and flexibility from the current ATCO population for the summer periods throughout the rest of the NR23 period.

Finally, a number of longer-term mitigations, which we have previously shared in our Palamon update reports, continue to be explored:

- > changing the way we deploy operational staff both into the operation and to service non-operational activities, to make our supply more agile to meet fluctuations in both sources of demand
- > further transformation of the ATCO training process designed to deliver new ATCOs into the operation faster and with improved success rates.

Several of these mitigations will require detailed engagement with the Prospect trade union and this is underway.

## 2. [Airspace Change](#)

Closed in Update 3 – February 2023.

## 3. [Engagement with Stakeholders](#)

Closed in Update 3 – February 2023.

## 4. [Coding of Air Traffic Control Delay](#)

NERL has now included the separate reporting of capacity and weather elemental delay and capacity and weather combined (bandboxed) delay into the Quarterly Condition 11 Report:

- > Capacity elemental delay is the equivalent of the “C” code used to attribute capacity delay
- > Capacity combined delay is the equivalent to the new “J” code proposed by the PRC
- > Weather delay in elemental sectors is the equivalent of the “W” code
- > Weather delay in combined sectors is the new “K” code proposed by the PRC.

NERL cannot currently incorporate the use of the proposed new codes into formal reporting, as they are not published in the ATFCM Operations Manual and not configured in recognised automated systems.

Discussions regarding the new codes have now entered the Eurocontrol forums and the subject of the PRC new delay codes is on the agenda at the NETOPS meeting on 6<sup>th</sup> and 7<sup>th</sup> March 2024.

For completeness, we cite below the updated Condition 11 reporting from the 2024 Service Standards Statement<sup>3</sup>:

<sup>3</sup> NERL Condition 11: Service Standard Statement 2024 (link)

## Post-operational delay reporting

Capacity delay (coded CE – Capacity Enroute – from the Eurocontrol Network Manager ATFCM Manual) is generated because of air traffic flow and capacity management (ATFCM) measures are applied to volumes of airspace. These traffic volumes (TFVs) are created to define individual sectors, combinations of sectors and traffic flows that exist within UK Airspace.

As we aim to deliver the most efficient service for our customers, we can configure our sectors on a tactical basis by either operating in a combined configuration (known as bandboxed) or as single sectors (elemental). These configurations can vary many times throughout a day.

We may choose to operate part of our operation in a combined / bandboxed state, depending on the exact demand, flow of traffic and other operational factors (such as weather or military activity). This implies that the workload generated by the traffic flow, or the scenario we are experiencing, is best served by that proposed combination and should not be seen as a sub-optimal configuration.

It is worth reminding that the ATC workload is not necessarily reduced by splitting our sector configurations into smaller elemental entities, as this increases the workload of ATC planners and co-ordinators for the safe and efficient co-ordination of individual flights.

In the NR23 Provisional Decision, the CAA recommended the use of delay codes proposed by the Eurocontrol Performance Review Commission (PRC), which have not yet been adopted by the Network Manager and are not available for selection on application of regulations. However, to accommodate the CAA's request and provide further transparency on the capacity delay (CE) and weather delay (WE) we included the following modifications in the Condition 11 Statement:

- > add a cause code chart which will report the capacity delay (CE) delay both by Elemental sector and Bandboxed sector delays.
- > add a cause code chart that will report weather delays (WE) both by Elemental sector and Bandboxed sector delays.

## 5. Sector information to Eurocontrol

NERL continues to meet the objective of this recommendation. NERL provides the information required by Eurocontrol Network Manager (NM) in the format it requests, and on a timely basis, to support NM activities.

We have established a high-level Business to Business (B2B) connection with Eurocontrol to receive data from the Network Manager. This is the first step towards being able to exchange data with NM and provide dynamic sector opening information in line with the iNM digital transformation programme over the coming years.

No further progress on this recommendation since the previous update.

## 6. Performance Data

Closed in Update 2 – August 2022.

## 7. Reporting on Resilience Planning

This fifth issue of our six-monthly reports meets part of the CAA's recommendation 7, to report on progress in maintaining a resilient service through adequate supply of operational staff across our network, as well as on steps to enhance airspace capacity and to engage more effectively with airline customers and airports on operational performance. We meet other parts of the recommendation in the updated staffing resilience plan, produced on an annual cycle, and most recently issued in January 2024.

In addition to this reporting, we engaged closely with airline customers and airports during 2021 in developing and consulting on our business plan for the NR23 regulatory period 2023-27, and subsequently on our evolving investment portfolio via the six-monthly Service and Investment Plan (SIP) consultation, with progress reports in the intervening quarters. This includes presenting evidence on the projected range of demand for en route service, versus the projected range of supply, as well as implications of traffic levels and the scale and pace of capital investment for service outcomes (in terms of delay and flight path efficiency).

The list below shows, in chronological order, where we have shared and discussed our staffing plans with customers since the issue of the Palamon Decision in February 2021:

- i. Palamon Decision Response (August 2021)
- ii. NR23 business plan prospectus and consultation (Autumn 2021)
- iii. Staff Resilience Plan Issue 1 (January 2022)
- iv. Palamon Update #1 (February 2022)
- v. NR23 Business plan submission (February 2022)
- vi. Palamon Update #2 (August 2022)
- vii. NERL response to CAA's Initial Proposals for NR23 (December 2022)
- viii. Staff Resilience Plan Issue 2 (end January 2023)
- ix. Palamon update #3 (February 2023)
- x. NERL Condition 5 Certificate 2R 2023 (June 2023).
- xi. Palamon update #4 (August 2023)
- xii. Staff Resilience Plan Issue 3 (end January 2024)
- xiii. Service and Investment Plan (SIP) consultation (January 2024)

Over the last two years, much of the consultation on staffing has been through the NR23 process, and as that process concluded last December, we envisage that for the remainder of this project most of our customer engagements will be via our regular SIP consultation and these Palamon updates.