

Project Palamon: Progress Update - February 2025

21st February 2025

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NATS

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Context

In response to the CAA's Final Decision on Project Palamon (CAP2100)¹, 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 seventh update to the CAA.

Summary of Progress

In its response to the recommendations of the CAA's Palamon investigation (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.

Our training programme has delivered an increase in controllers and validations, specifically a 10% increase in validations and 6% increase in controllers since summer 2019. Aligning the training evaluation process has delivered improvements in training efficiencies by allowing students to progress more quickly through the phases of live training. Additionally, standardising procedures for operating the Approach functions has simplified training for controllers extending on to additional sectors.

We have 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. The details of the new air traffic control delay coding are reported in Section 4 of this document.

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

Update on the Recommendations

1 Staffing Resilience

Summary

Our training programme continues to deliver new controllers and additional validations into Terminal Control (TC) Approach. At the end of January 2025, the number of validations supporting the approach control functions of the London airports [compared to summer 2019] were: Heathrow 41 [43], Gatwick 34 [30], Stansted 33 [26], Luton 30 [24] and London City 29 [31]. These validations are held across 121 valid controllers. Together, this amounts to a 10% increase in validations and a 6% increase in controllers since summer 2019.

These figures are the month-end snapshot before the submission of the Palamon progress report and are lower than those reported in February and August 2024. Additional Approach validations are forecast for the coming months and are outlined in the training efficiency section below. Our operational supply versus demand forecasting for TC, which we share as part of the NERL ATC Staffing Resilience plan, models our supply in the Heathrow and non-Heathrow Approach functions as sufficient for the combined demand for the remaining years of NR23.

In addition to maintaining an increased headcount and validations, we have continued to enhance resilience by developing initiatives related to training efficiency and flexible resource deployment.

Please see below for further details on our progress since August 2024.

Training efficiency

We are forecasting several extension validations for existing controllers in the coming months. This includes 1 Heathrow validation, 2 Luton validations and 1 Stansted validation in March, and 3 Gatwick validations in April. We also expect a number of students to validate as new ATCOs in Spring 2026, jointly at Stansted and Luton as well as at Gatwick and London City.

NATS has continued progressing the work with the CAA and the DfT to recognise non-UK Civil ATC training. The DfT intends to put the amended legislation before Parliament in November 2025 and workshops are planned throughout this year to engage industry stakeholders and share the CAA's proposed process.

Flexible Deployment of Resource: Operational staff deployment

In our August 2024 update, we noted the additional attendances we were able to secure in the May to August 2024 rosters as a result of an agreement reached with the Prospect trade union. For the May to September 2024, this resulted in more than 750 additional attendances in the published ATCO rosters than were achieved across the same months in 2023. The agreement was anticipated to apply to summer periods for the remainder of NR23, and NATS and Prospect committed to reviewing the agreement's effectiveness after each summer season. In October 2024, NATS and Prospect negotiated a replacement to a previous national agreement which governed additional attendances. This replacement agreement supersedes the one put in place specifically to cover the summer periods for NR23, incorporating refinements to the agreement's mechanisms. This new agreement benefits NATS with provisions to further target requests for additional attendances to specific validations/timeframes where required. It also enhances options that existed to provide flexibility to change agreed shifts.

Improvements continue to be prioritised across the business to further mitigate supply and demand risk across NERL operations in the coming years. We continue to explore:

- 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 with improved success rates.

Several of these mitigations require detailed engagement with the Prospect trade union, which remains ongoing. These updates will share the benefits realised for staffing resilience.

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](#)

Engagement with Eurocontrol Network Manager, other ANSPs and airlines representatives has continued through attendance at the Delay Code Working Group. Meetings were held on 11th September and 29th November 2024. A further meeting took place on 21st January 2025 before the proposal is made to NETOPS on 25th February 2025.

The latest proposal is as follows but still not agreed by all stakeholders:

- [J Code](#). Demand exceeds, or complexity reduces ATC capacity, where an increase of planned staffing could have mitigated the delay. A reason for the capacity reduction should be provided in the ANM remark, e.g., Structural Staffing, Traffic shift.
- [S Code](#). An unplanned staff shortage reduces capacity after the pre-tactical plan has been finalised. e.g. Late Sickness.
- [C Code](#). Demand exceeds or complexity reduces ATC capacity. Where an increase of planned staffing could not have mitigated the delay. A reason for the capacity reduction should be provided in the ANM remark, e.g., Traffic Shift.

The working group will further debate and amend this proposal and, if approved by NETOPS, will continue through the governance approval at NDOP and NMB with a recommended implementation date.

Post-operational delay reporting

In the NR23 Provisional Decision, the CAA recommended the use of delay codes proposed by the Eurocontrol Performance Review Commission (PRC), however, these codes have not yet been adopted by the Network Manager and are not available for selection on application of regulations.

To accommodate the CAA's request and provide further transparency on the capacity delay (CE) and weather delay (WE), we have included modifications in the Condition 11 Statement. From Q1 2024, we report on weather and capacity delay by elemental and bandboxed sectorisation.

5. Sector information to Eurocontrol

NERL continues to meet the objective of this recommendation. There is no further progress on providing dynamic sector opening via a Business to Business (B2B) connection.

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 seventh 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, updated annually, and mostly recently issued in January 2025.

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)
- xiv. Palamon update #5 (February 2024)
- xv. Service and Investment Plan (SIP) consultation (June 2024)
- xvi. Palamon update #6 (August 2024)
- xvii. NERL Portfolio Update (October 2024)

- xviii. NATS Airspace and Flight Efficiency Partnership (AFEP) Meeting (November 2024)
- xix. NERL Service and Investment Plan (SIP25) consultation (December 2024)

We envisage that for the remainder of this project most of our customer engagements on this topic will be via our regular SIP consultation and these Palamon updates published.