

Swanwick Airspace Improvement Programme
Airspace Development 4 (Dutch Interface Routes)

SAIP AD4
Gateway documentation:
Stage 3 Consult

Steps 3A and 3B Consultation Strategy



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References

Ref No	Description	Hyperlinks
1	SAIP AD4 CAA web page – progress through CAP1616	(link)
2	Stage 1 Assessment Meeting Presentation	(link)
3	Stage 1 Assessment Meeting Minutes	(link)
4	Stage 1 Design Principles	(link)
5	Stage 1 Stakeholder Engagement Evidence	(link)
6	Stage 2 Design Options	(link)
7	Stage 2 Design Principle Evaluation	(link)
8	Stage 2 Initial Options Safety Appraisal	(link)

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1. Introduction

- 1.1 This document forms part of the document set required in accordance with the requirements of the CAP1616 airspace change process.
- 1.2 This document aims to satisfy the requirements of Stage 3 Consult Gateway, Steps 3A and 3B Consultation Strategy
- 1.3 Previous documents^(Refs 6,7,8) have reduced the number of design concepts to one, known as Option 3. This is the preferred concept option. The “do nothing” option has been discounted as it did not fully meet any of the design principles, including categorically not meeting the highest priority principle of achieving ANSP agreement^(Ref 7). There is still scope for feedback on the specific details of the concept option upon which we are consulting – the removal of other concepts does not remove the scope for formative feedback.
- 1.4 NATS is proposing systemisation of air traffic services (ATS) routes within existing controlled airspace (CAS) at the eastern interface with Maastricht and LVNL, within the region of airspace in the Dutch flight information region (FIR) where ATS is delegated to the UK, part of London Area Control’s (LAC) Clacton sector group.

2. Engagement activities summary so far

- 2.1 The NATS engagement activities have been carried out in accordance with the plan described in the Stage 1 Assessment Meeting Minutes^(Ref 3, Section 7).
- 2.2 Analytics completed an environmental benefits assessment for the baseline and proposed Option 3 concept. The proposed Option 3 showed an overall fuel dis-benefit; however the conflict analysis indicated that there would be an overall benefit in the number of conflicts and hence reduced complexity. A reduction in air traffic control complexity is generally seen as a benefit to safety.
- 2.3 The most recent engagement activities were all based on the Option 3 concept. The engagement activities are listed in the Stakeholder Engagement Evidence^(Ref 5).
- 2.4 NATS has met with, and briefed, the airlines BAW, CFE, BEE, EZY, IBK, KLM, RYR, SAS and WZZ¹ on the proposed changes. These meetings were preceded by, and followed up with, email exchanges.
- 2.5 The NATS Operational Partnership Agreement (most recent OPA meeting 20th March 2018) and Flight Efficiency Partnership (most recent FEP meeting 21st March 2018) are two forums where this proposed change was discussed.
- 2.6 The MoD was engaged via Defence Airspace and Air Traffic. Management (DAATM) and indicated it has no objection.
- 2.7 Typically, the operators covered by the National Air Traffic Management Committee (NATMAC) forum would be engaged, however there would be duplication with the main stakeholders, and not all operators are covered by the NATMAC forum.
- 2.8 The outcomes of the stakeholder engagement summarised above show that appropriate engagement has occurred via appropriate mechanisms, and the most relevant operators are fully aware of the consultation constraints (in particular the reduced consultation period, see paragraphs 3.15-3.16 for details).

¹ See Section 0

Annex A: List of Stakeholders for airline stakeholder details.

2.9 The engagement feedback we received has been considered in the drafting of the Stage 3 documentation.

3. Consultation Strategy: Audience, Approach, Materials and Length

- 3.1 This is an en-route network proposal over the sea above 7,000ft within existing controlled airspace. It is a Level 2A airspace change.
- 3.2 A standard environmental analysis focussing on the fuel/ CO₂ impacts has been completed. No analysis relating to noise or local air quality has been completed because the change would occur over the North Sea at high level.
- 3.3 NATS does not plan to target organisations whose primary interest is environmental (e.g. noise, local air quality). There would be no change in impact.
- 3.4 NATS does not plan to target airspace users classed as General Aviation (GA), such as parachuting, ballooning/airships, helicopter operations and UAV/model aircraft flying. There would be no change in impact.
- 3.5 NATS does not plan to target airport operators. There would be no change in impact.
- 3.6 The Maastricht (MAAS) and Dutch (LVNL) ANSPs are collaborative sponsors and partners within this airspace change proposal. They will be asked to provide feedback to the consultation.
- 3.7 The reason airlines BAW, CFE, BEE, EZY, IBK, KLM, RYR, SAS and WZZ² were our primary target is that, combined, their flights account for c.70% of all flightplans using waypoint GORLO, and also are the operators whose proportion of flights each makes up 2% or more of flights using that same waypoint. These nine airlines are those most likely to be frequently impacted by the proposed changes, with the most frequent having an average of more than 50 flights per day, and the least frequent at least 7 flights per day.
- 3.8 We will primarily target these nine major operators and actively seek their in-depth responses. They will each be provided with the standard environmental analysis and separately, an individual estimate of the predicted fuel change per flight. This estimate will be commercially confidential per operator, not for publication as part of the consultation.
- 3.9 A further 374 operators flew via GORLO in 2017, making up the remaining 30%.
339 of those operators flew on average less than once per day.
285 of those operators flew on average less than once per week.
199 of those operators flew on average less than once per month.
- 3.10 Proportionally, the remaining operators lower down the list fly far less frequently than the nine primary targets. However we have directly emailed a further twelve operators CPA, AFL, EWG, GWI, FIN, LOT, DAL, BCY, UAE, VIR, VLG and NJE² asking if they wish to be included in the consultation. A further email will be sent, providing them with the consultation material and inviting a response.
- 3.11 The MoD is a mandatory stakeholder in all airspace changes, and will be consulted via DAATM as per standard airspace consultations.
- 3.12 We will put a link to the consultation on the NATS Customer Affairs website, one of the information transfer mechanisms between NATS and our customer airlines.
We will also put a link on the NATS.aero website, which is available to the public.
Any individual or organisation may submit a response, however we are only targeting the organisations discussed in this document.

2 See Section 0

Annex A: List of Stakeholders for airline stakeholder details.

- 3.13 Our stakeholders are considered to be an aviation expert audience; therefore we plan to use aviation technical language in the consultation material, in English only. We plan to conduct the consultation entirely via the internet (including email and online consultation portal).
- 3.14 The timeline for this proposed airspace change is fixed by a MAAS ANSP's planned implementation of free route airspace in the region on the 6th December 2018.
- 3.15 Typically, an airspace change consultation would have a 12-week duration. That period would push the timeline for implementation beyond the agreed target implementation date for MAAS free route airspace. This is accounting for the fixed periods of CAA decision-making and AIS data lead time for a single AIRAC cycle.
- 3.16 There have been significant stakeholder engagement activities – our primary stakeholders are already in a well-informed position, see Section 2 for a summary. The duration of this targeted consultation will be four weeks, which we consider is sufficient given the pre-existing engagement. There is insufficient time to allow for a longer consultation due to the operational constraint of MAAS' simultaneous change. Having completed the process consultation gateway, NATS intends to commence consultation on **Wednesday 2nd May 2018** and subsequently close it on **Wednesday 30th May 2018**.
- 3.17 The mid-point of the consultation will be two weeks after the email launch. At this time we will consider the responses received so far and will actively request a progress update from those remaining primary targeted stakeholders, taking into account the constraints detailed in this section.
- 3.18 Responses will be managed and uploaded to the portal by the CAA. If responses contain any commercially sensitive data (such as typical aircraft weights / load factors etc.) then NATS expects CAA to redact that sensitive information, as part of its moderating practice. Should responses contain requests for clarification, a list of FAQs would be added to the consultation website.
- 3.19 At the end of the four week deadline the responses will be analysed and themed; any late responses may not be included in the subsequent analysis.
- 3.20 The consultation feedback document will summarise the themes and NATS' response to issues raised – this may involve making changes to the design. The feedback document will be available for download via the CAA portal, and the ACP will be written based on the final design described in the feedback report.

4. Reversion Statement

- 4.1 Should the proposal be approved and implemented, it would be extremely difficult to revert to the pre-implementation state. This is due to the simultaneous implementation of free route airspace by Maastricht ANSP, which permanently and significantly changes the airspace structure in Dutch-managed airspace and associated interface with UK-managed ATS. This will be noted in the consultation material.
- 4.2 There would be notable consequences for UK connectivity and its interface with the Netherlands if this work is not complete by the planned implementation date of 6th December 2018. If the UK and MAAS changes are not implemented coincidentally there could be significant issues filing acceptable flight plans.

5. Conclusion and Next Steps

- 5.1 The proposed concept for the airspace design is Option 3. Full descriptions of other options ^(Ref 6) and the details of how Option 3 was decided upon as the preferred option ^(Ref 7) can be found in the airspace change documentation published on the CAA website ^(Ref 1). Work has been ongoing on the specific route details of the Option 3 concept, and the CO₂ analytics data uses the latest iteration. This analysis will provide the required information for the Full Options Appraisal.
- 5.2 We consider this consultation strategy to be reasonable and proportionate. We have identified the relevant stakeholders, have engaged with those most likely to be impacted, given advance notice that the consultation would last four weeks & primed them for that turnaround, and have made clear that there is scope to change the proposal based on their feedback.
- 5.3 This proposal has completed the CAA's Stage 3 Gateway Assessment for consultation. We will finalise the consultation material, set up the appropriate online consultation portal and launch the consultation via email.

6. Annex A: List of Stakeholders

Links to the consultation will be placed on the NATS Customer Website and also on the NATS public website.

The consultation is most relevant to the stakeholders listed below – who will all be emailed PDF copies of the consultation material, and sent links to the consultation feedback website - but is not exclusive to this list.

Any individual or organisation may submit a response, however we are only targeting the organisations discussed in this document.

Mandatory Stakeholder:

MoD Ministry of Defence via Defence Airspace & Air Traffic Management (DAATM)

Primary Target Stakeholders:

These nine air operators will be engaged during the consultation and their response actively sought

BAW British Airways
RYR Ryanair
WZZ Wizz Air
EZY easyJet
KLM KLM Royal Dutch Airlines
BEE Flybe
IBK Norwegian Air Shuttle
CFE BA CityFlyer, a subsidiary of British Airways
SAS Scandinavian Airlines

Additional Stakeholders:

These twelve air operators will be informed of the consultation and encouraged to respond

CPA Cathay Pacific
AFL Aeroflot
EWG EuroWings
GWI GermanWings
FIN Finnair
LOT LOT Polish Airlines
DAL Delta Airlines
BCY CityJet
UAE Emirates Airline
VIR Virgin Atlantic
VLG Vueling Airlines
NJE NetJets

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