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Managing Director
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20 August 2018

NATS Protected

Dear Redacted

Subject: ScTMA Airspace Change Proposal – Consultation Feedback

Thank you for responding to our recent ScTMA Airspace Change Proposal and for your support to use RNAV1 for our change.

I also note your objection to our ACP and hope that my responses to the points you've raised below will provide you with clarity around why NERL believes our ACP is the right design, why we believe our implementation is necessary and timely and that you are assured by the steps we've taken over the past four years to ensure that Glasgow were able to influence, and benefit from, our design:

1. New position of Glasgow hold

NERL's consultation indicated the broad location of the hold and didn't specify its actual location. On that basis, noting your objection to the hold's new position, I'm keen to understand more about why you've objected to this, in particular what aspect(s) are causing concern, and what steps you believe are within NERL's gift to gain your support ?

Turning to the hold itself, its location was based upon the location provided to a member of my team [Redacted] by correspondence on August 30th, 2017 primarily to accommodate the proposed Glasgow ACP. It was used during NERL's November and December 2017 airspace simulations, witnessed by your team, and where Glasgow ATC confirmed via feedback it's suitability as recorded within our post-simulation report.

NERL believe we have involved Glasgow in the decision around the location of the hold and would like to understand why a hold location based on this location, which was suitable in December 2017, is no longer supported by Glasgow Airport.

Crucially, I'm sure you'll recognise the final position and orientation of this hold must reflect the needs of Glasgow Airport, other local airports and of course airspace users within this airspace. Our current planning, based upon the last updated Glasgow Airport ACP design, is that this hold

will be within 0.57nm of the position provided in the note from [Redacted]. We believe this small change is necessary, will not materially impact the design previously discussed with Glasgow Airport, and supports the ACP designs being submitted by Prestwick and Edinburgh. We're preparing some work around this aspect to share with Glasgow Airport at our meeting on September 7th with [Redacted].

2. **DVOR removal in relation to the Glasgow Airport ACP**

The case for DVOR rationalisation was subject to NATMAC consultation in 2009 following which NERL was tasked with (variously) renewing / removing these assets, plus changing ATC procedures that are based upon them. Our records indicate that we commenced discussions with Glasgow Airport in January 2014 and have worked very closely with Glasgow Airport bilaterally, within the Scottish DDG and most recently within the FASI(N) Steering and ScTMA Working Groups around the impact this has upon airspace users. Throughout, NERL has consistently demonstrated considerable flexibility in re-scheduling our engineering and airspace programmes to extend the planned date for these facilities to be withdrawn to assist Glasgow in bringing forward its airspace change work.

Notwithstanding Glasgow Airport's changes, NERL must remove its own reliance on these DVORs. The scope of our ACP was therefore changes to the design of Scottish TMA airspace that achieves this and which are related to the LANAK hold move. Our reference to DVOR withdrawal was therefore to explain our obligation to remove our dependencies on these DVORs by December 2019, and not to consult on DVOR removal which is clearly outside the scope of this ACP and CAP1616.

I recognise the timing difference between NERL's airspace change implementation and that of Glasgow Airport. During this time, and consistent with recent discussions between teams from Prestwick Centre and Glasgow Airport on June 18th, 2018, and also with Jem Dunn, NERL has committed work to explore the possibility, impacts and risks of extending the service life of those DVORs. Given the scope of our ACP, "written assurances" that may be secured to do so must be subject to bilateral discussion between Glasgow Airport and NATS and cannot be assured or fall within the scope of this ACP.

3. **The future of TRN / PTH DVORs and sufficient Focus on Glasgow ...**

As noted previously, NERL must remove its dependency on these DVORs by end of 2019, with our ACP ensuring that STARs will not be dependant on these facilities from 2020. We note the reliance of Glasgow's SIDs on them and the ongoing bilateral discussions above relating to the DVOR network and the focus on a later planned retirement of these assets.

During our regulatory preparation, NERL received direction from CAA not to include reference to Glasgow changes since Glasgow had not actually commenced their CAP1616 process. Thus, irrespective of the considerable focus we have provided to Glasgow's needs to date, we acted upon this direction in not referencing the expected Glasgow Airport ACP which is of course, outside of the scope for our change.

We believe we've provided substantial focus on Glasgow's operations over several years, noting the support and close working between both organisations around the need for timely change, airspace design and also of the design criteria that may prove successful for all stakeholders to the Glasgow operation, including lessons observed from other network stakeholders. Our intent throughout has been to assist Glasgow, and we continue to support this focus on Glasgow operations through our direct commitment to the FASI(N) Working and Steering Groups and also bilaterally to the extent we are able, as requested by Glasgow, throughout your CAP1616 ACP journey.

4. **The future of the LIBBA hold ...**

The introduction of the RULUR hold, being an RNAV facility, obviates the need for a contingency STAR and hold at LIBBA. Consequently, and based upon your feedback, the work underway at this stage of the ACP will confirm our intent to remove LIBBA.

5. **Changes to STARs at STIRA, FOYLE and FYNER _**

Consistent with previous CAA direction above, NERL did not speculate on Glasgow's ACP pending the commencement of your work under CAP1616.

NERL must remove our dependency on those STARs / holds using these DVORs through the replication of these STARs and holds under RNAV5. Further work related to this aspect is underway, by both Edinburgh and NERL, and will be coordinated with you and your teams via your bilateral Glasgow ACP engagement and via the FASI(N) Steering and ScTMA Working Groups respectively.

Redacted I hope we can agree that there has been substantial close working between Glasgow Airport and NERL, both bilaterally and within the FASI(N) Steering Group / Working Group and its predecessors. I trust you are able to evidence, outside of the scope of our ACP document, the level of work we've collaborated around to support Glasgow Airport's development and investment aims, however if you remain in doubt or are still concerned about the extent of this collaboration, I'd be happy to spend whatever time is necessary with you to provide assurance of the work NERL have done with members of the Glasgow Airport team.

Throughout, NERL has been clear around our need to act in good time to the direction of CAA. Our ACP reflects our need to end our reliance on these DVOR assets by 2019, and I hope this provides you with assurance that we have taken, and continue to take, Glasgow's airspace change plans into account, and that we're preparing a wider ATM environment that will enable your ACP when you are ready to bring that proposal forward under CAP1616.

In the meantime, may I offer the support of me and my team to maintain our commitment to close working so that we both may benefit.

Yours sincerely,