

Future Airspace Strategy
Implementation North (FASI-N)

PLAS ScTMA
Step 3D Collate and Review Responses



NATS

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Issue	Month/Year	Change Requests in this issue
Issue 1	Aug 2018	Submitted to CAA for publication

References

Ref No	Description	Hyperlinks
1	FASIN ScTMA CAA web page – progress through CAP1616	Link
2	Stage 1 Assessment Meeting Presentation	See ref 1 link
3	Stage 1 Assessment Meeting Minutes	See ref 1 link
4	Stage 1 Design Principles	See ref 1 link
5	Stage 2 Design Options	See ref 1 link
6	Stage 2 Design Principle Evaluation	See ref 1 link
7	Stage 2 Initial Options Safety Appraisal	See ref 1 link
8	Stage 3 Consultation Strategy	See ref 1 link
9	Stage 3 Options Appraisal	See ref 1 link
10	Stage 3 Consultation Website and Document	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 provide adequate evidence to satisfy Stage 3, Step 3D Collate and Review Responses

2. Consultation

2.1 NATS has completed consultation on proposed airspace changes designed to re-align some ATS routes within the Scottish Terminal Manoeuvring Area (ScTMA).

2.2 The timeline for this proposed airspace change is aimed to align with the implementation of changes proposed by Edinburgh Airport, on the 28th February 2019 (AIRAC 03/2019).

2.3 The consultation strategy document (Ref 8) describes the focus of the consultation including previous engagement activities completed, the audience of the consultation and justification behind the consultation strategy.

2.4 A consultation document (Ref 10) was written for the proposed airspace change and provided to stakeholders. This includes a description of the current airspace, the proposed changes and impacts of the proposal.

2.5 A total of 47 airlines, 28 NATMAC representative organisations, five airports and the MoD were specifically targeted for this consultation.

2.6 The targeted stakeholders were sent a notification email to inform them when the consultation was live. This included information on how to respond via the online portal. Additional reminder emails were sent to those who had not responded 2 weeks before the end of consultation.

2.7 The consultation was conducted via the Citizen Space online portal. This provided an overview of the proposed changes, the consultation document (available for download), an Appendix showing typical aircraft profiles and a survey which allowed users to submit their feedback. See Section 8 Appendix A – Online Portal Questions.

2.8 We included a link to the consultation portal on the NATS Customer Affairs website, which is used to exchange information between NATS and our customer airlines.

2.9 The consultation commenced on 30 May 2018 and ended on 26 July 2018, a period of 8 weeks.

2.10 Responses have been managed, moderated and uploaded to the portal by the CAA.

3. Summary of Consultation Responses

3.1 This consultation received fifteen responses. The numbers of responses were as follows:

- Airports – 4
- NATMAC representatives & aviation industry representatives – 4
- Airlines – 4
- MoD – 1
- Individuals – 1
- District Community Councils – 1

The overall response categories were as follows.

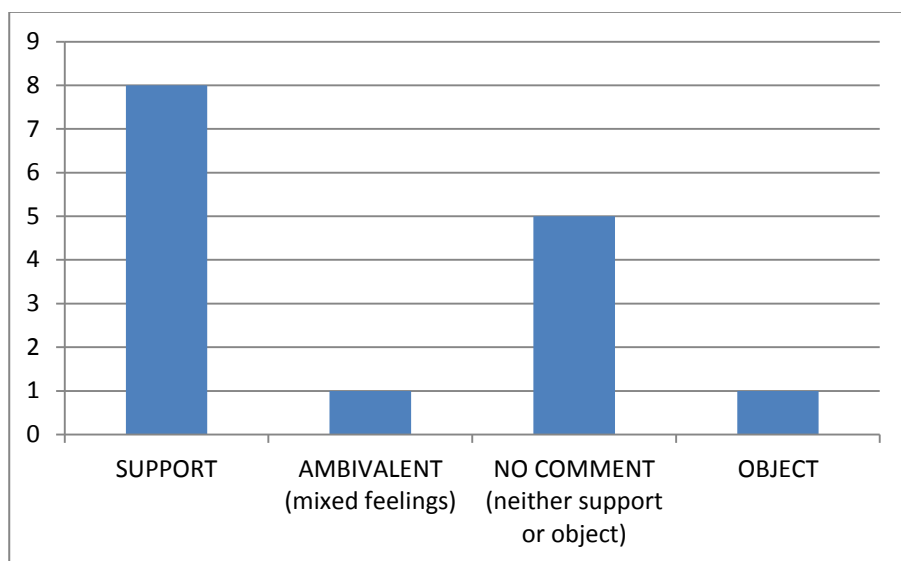


Figure 1 Overall response categories

3.2 Respondents were asked for their feedback related to the individual aspect of the proposals. These responses have been analysed and themed. The categorisation of responses has been split into those which may impact the proposal and those which would not. This is covered in Section 4.

3.3 The online portal included focussed questions on whether the respondent supported specific elements of the proposed changes. The questions and their responses are shown in Figure 2.

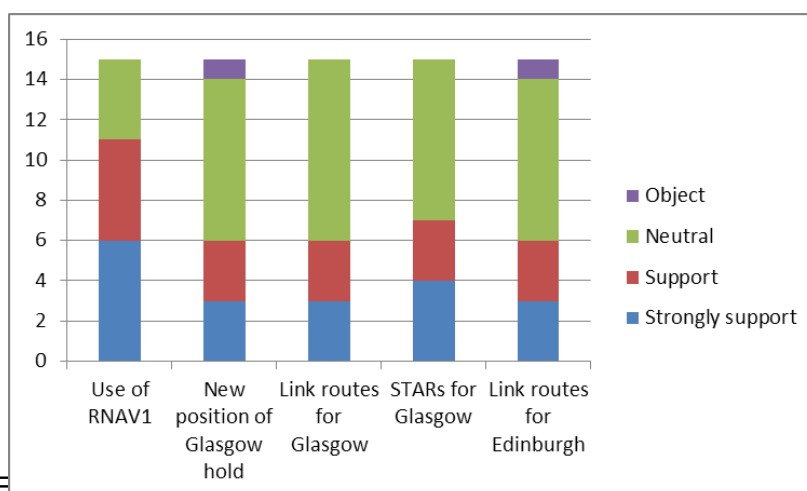


Figure 2 Responses to themed questions 'to what extent do you support...'

3.4 The majority of respondents showed support for the use of RNAV1, the remainder were neutral.

3.5 The responses received relating to the hold and STARs to Glasgow and Edinburgh link routes were similar with most stakeholders supportive or neutral.

3.6 There were two responses from Glasgow Airport. The first, from the Glasgow ATC unit was supportive of the proposed changes. The second from the Interim Head of Glasgow Airside Operations was submitted as an objection. The points raised in this response are discussed in detail in section 4. Subsequent to the consultation closing there were discussions with the Managing Director of Glasgow Airport, the NATS written response to Glasgow Airport is included in Appendix B.

4. Categorisation of Consultation Responses and Themes

4.1 The responses received have been reviewed and categorised; some comments were made up of several different elements. Where appropriate, these have been broken out and categorised into individual elements.

4.2 The responses and associated elements have been broken down into two types:

4.2.1 Those with potential to impact the proposal (possibly leading to an adaptation);

4.2.2 Those which do not have that potential – the remaining comments and elements.

4.3 This approach complies with the CAP1616 Appendix C Table C2 categorisation of responses, and the “we asked, you said, we did” consultation approach.

This document (Step 3D) details “we asked, you said”.

A separately published document (Step 4A) will detail “you said, we did”.

4.4 Where a response does not impact on the final proposal, a rationale has been included in the table under paragraph 4.7 alongside any relevant feedback or considerations.

4.5 Response comments which may impact final proposals

Response ID (NATS and Website)	Comment	Themes	Relevance to consultation	NATS response and Element Number
Rockwell Collins NATS ref ScTMA-07 Consultation website ref ANON-267C-1V1B-V	If a STAR joins seamlessly to a transition to approach, the bottom STAR altitude should be identical to the first altitude on the approach transition. This is to insure there is no ambiguity in the intended procedure altitude when using FMS equipment.	Connectivity /continuity	Reminder from the coding houses, that this issue has occurred in the past & can cause FMS discontinuities (DISCO) errors. (relevant)	Element 1. PDG have performed checking of continuity of altitudes between all procedures. This has ensured there are no anomalies/ discontinuities in the flight profiles. (Note for the Glasgow STARs terminating at RULUR there is no arrival transition from the hold. Arrivals are given radar vectors to join the IAP.)
Glasgow Airport ATC unit NATS ref ScTMA-09 Consultation website ref ANON-267C-1V11-B	NATS Glasgow supports these proposals. Although the requirement to follow a different change process (CAP1616 rather than CAP725) adds risk that future Glasgow proposals may not mirror those that were consulted on in January 2018, we are confident that the principles underpinning any future proposals will remain the same and that benefits in terms of safety, operational efficiency and predictability can be realised by the establishment of RULUR and associated STARS.	Dependency between ACPs	Not strictly relevant to this consultation, but a reminder that as Glasgow develops its future ACP under CAP1616 the network interfaces and interactions will need to be considered.	Element 2. The Glasgow related aspects of this ACP were developed to help address the complexity of interactions in the current day operation between Glasgow and Edinburgh traffic. The proposed design was developed in full cognisance of Glasgow’s aspirations for airspace change to modernise and improve its arrivals and departures. The future Glasgow proposals are outside the scope of this consultation and will be subject to separate consultation in due course.

Response ID (NATS and Website)	Comment	Themes	Relevance to consultation	NATS response and Element Number
Dalkeith and District Community Council NATS ref ScTMA-13 Consultation website ref ANON-267C-1V1E-Y	<p>Since the Edinburgh ACP is still the subject of contention and further consultation, it seems a bit presumptuous to be putting forward these changes until the process has been concluded, almost as if the decision has already been made and the current consultation is just a tick box exercise. Furthermore, we wish to object to the omission of two of the options originally considered, namely Proposal 2, the introduction of a new CAS - the St. Abbs CTA and Proposal 3, the Lamma triangle. Both of these we feel would have given ATC greater flexibility to route planes away from the heavily populated areas of Midlothian.</p>	Dependency between ACPs Preference for additional CAS (rejected options)	<p>Questioning whether related consultations can take place concurrently. (relevant)</p> <p>Support for rejected options (relevant): Proposal 2 the St. Abbs CTA and Proposal 3, the Lamma triangle.</p>	<p>Element 3. There are interdependencies with the Edinburgh proposals. During consultation for <i>this</i> ACP Edinburgh's designs were at a mature stage. Edinburgh was engaging in a period of supplementary consultation on some aspects concurrently. However these aspects (considerations regarding the Cramond-offset and RWY06 departures) were not likely to have an impact on the Network changes proposed by this ACP. Edinburgh's consultation has now closed and their ACP has been submitted to the CAA. There have been no changes resulting from the Edinburgh supplementary consultation material to this ACP.</p> <p>Element 4. Proposals 2 & 3 have not been progressed as part of this ACP since the airspace capacity in the ScTMA is currently adequate, up to at least 2025 based on simulation and traffic forecast data. Hence currently, justification to introduce the additional CAS required for these changes is not sufficient. However as traffic numbers increase it is very possible that these proposals may be revisited.</p>
Glasgow Airport Ltd NATS ref ScTMA-14 Consultation website ref ANON-267C-1V19-K	<p>The removal of procedures from the VORs – The deadline for the removal of procedures using the following VORs (GOW, TRN and PTH) is set as December 2019. The consultation document was released in May 2018 when the Glasgow Airport ACP situation (DfT/CAA decision) was already apparent; yet the dates proposed by NERL do not allow sufficient time for the Glasgow CAP1616 ACP to reach a successful conclusion. The document states that these VORs will be withdrawn in May 2020. We require written assurances from NATS to maintain the GOW VOR until March 2022 (or earlier if a CAP1616 process is achieved earlier).</p> <p>There is also a concern about the impact of the withdrawal of the TRN and the PTH. The GLA SIDs and STARS require all three of these to be available to ensure all operational procedures remain flyable.</p> <p>There appears to be insufficient focus on GLA specific operations.</p> <p>No mention of the LIBBA (NDB based hold) being withdrawn – The LIBBA hold appears in the AIP as the contingency for the eventuality that the GOW VOR is unavailable. It is predicated on the GLW NDB but many cannot fly this. It is accepted that the traffic will be able to fly the proposed RNAV5 hold but the removal of LIBBA should at least be referenced.</p> <p>Furthermore, the future of the RNAV holds associated with the STARS at STIRA, FOYLE and FYNER is not mentioned. Given that all of these holds are of importance to the Glasgow operation, it is important to clarify the intent of PC on these procedures.</p>	Dependency between ACPs VOR rationalisation EGPF change proposals.	<p>VOR rationalisation issues – not relevant</p> <p>GLA change proposals – not relevant.</p> <p>LIBBA hold relevant</p> <p>RNAV holds at STIRA, FOYLE and FYNER not relevant.</p>	<p>Note NATS responded to Glasgow direct, by the letter include in Appendix B.</p> <p>Matters relating to VOR rationalisation are out of scope of this consultation.</p> <p>Aspects relating to GLA specific operations were removed at the direction of the CAA since GLA had not yet started the CAP1616 airspace change process.</p> <p>Element 5. Clarification re the LIBBA hold. The introduction of the RULUR hold, being an RNAV facility, obviates the need for a contingency STAR and hold at LIBBA (which is based on the TLA VOR). Consequently we confirm it is the intent to remove the STAR via LIBBA, and the LIBBA hold.</p>

4.6 These elements will be considered in more detail in Step 4A and a conclusion reached there.

4.7 Response comments* which do not impact final proposals

*If a stakeholder has not provided any comments, then they are not referenced in this table.

Response type and reference	Summary of Comments	Themes of comment	Why the proposal is not impacted	Any relevant considerations/ feedback
Glasgow Prestwick Airport NATS ref ScTMA-03	Supportive of proposals. Specifically mentioning moving LANAK hold to RULUR.	Efficient use of airspace	General support, no changes suggested	N/A
Individual NATS ref ScTMA-05	No impact on GA flying or ballooning	No impacts on GA	General support, no changes suggested	N/A
Emirates NATS ref ScTMA-06	No issues. Reduction in fuel burn/CO ₂ emissions.	Efficiency	General support, no changes suggested	N/A
BMAA NATS ref ScTMA-10	No impact on GA flying	No impacts on GA	Neutral - no changes suggested	N/A
MoD NATS ref ScTMA-12	No objection.	No impacts on MoD operations	Neutral - no changes suggested	N/A
BA NATS ref ScTMA-15	Supportive of proposals. Reduced track mileage/fuel burn. No requirement for increased CAS. STAR naming to ICAO convention supported.	Efficient use of airspace	General support, no changes suggested	N/A

5. Conclusion and Next Steps

5.1 We will consider the elements received as per table 4.5 and may update the final design.

5.2 This document will be published onto the FASIN ScTMA CAA web page alongside the documents referenced on Page 3. This Step 3D document details “we asked, you said”. The next step will be to write and publish the Step 4A document which will detail “you said, we did”.

5.3 At the same time or shortly after, we will submit Step 4B Airspace Change Proposal to the CAA. It will contain information on how the consultation feedback informed the evolution of the final proposed design.

6. Reversion Statement

6.1 Should the proposal be approved and implemented, a post implementation review will be undertaken after the airspace has been in operation for 12 months. At this point whether the airspace change has achieved its design objectives will be evaluated. Due to the interdependencies between these changes and those proposed by Edinburgh (which are planned to be operational during this time frame); if the proposed changes do not meet the objectives, reversion to the pre-implementation state would have to take account of the related airports’ changes.

7. List of Stakeholders

- 7.1 The stakeholders directly targeted in the consultation were as listed in the Consultation Document Appendix A (see Ref 10).
- 7.2 Links to the consultation were placed on the NATS Customer Website and also on the NATS public website. One member of the public responded.
- 7.3 The consultation was most relevant to the Airline, NATMAC and Airport stakeholders as listed in the Consultation Document Appendix A, but not exclusively.

8. Appendix A – Online Portal Questions

The following questions were included in the online portal for users to complete. Multiple-choice answers have also been shown below, alongside whether the question was mandatory or not.

Introduction

- 1 What is your name? (Required)
- 2 What is your email address? (Required)
- 3 Please enter your postcode (most relevant to your response home/ work/ organisation etc).UK only - if responding from outside the UK please complete the next question instead
- 4 If responding from outside the UK, please supply an address or location description
- 5 Who are you representing? (multiple choice)
 - I am responding on behalf of an organisation (selecting this requires Qs 7 & 8 are populated)
 - I am responding as an individual
- 6 Please note all responses will be published. Are you happy for your name to be included in the response publication? (multiple choice)
 - Yes - I want my response to be published with my name
 - No - I want my response to be published anonymously

Organisation Details

- 7 What is your organisation name?
- 8 What is your position/title?

Your Feedback

- 9 Do you support the airspace changes in this proposal? (multiple choice, Required)
 - SUPPORT - I support the proposed changes
 - AMBIVALENT - I have mixed feelings
 - NO COMMENT - I neither support or object
 - OBJECT - I object to the proposed changes
- 10 Please rank your reaction to the individual aspects

	Strongly support	Support	Neutral	Object	Strongly object
Use of RNAV1	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
New position of Glasgow hold	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Link routes for Glasgow	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
STARs for Glasgow	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Link routes for Edinburgh	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

11 Please give your feedback comments on the overall proposal. (Text input)

12 Would you like to make more comments on any individual aspects? (multiple choice, Required)

- Yes (selecting this gives the option to provide further comments against each individual aspect in fields 13 -17)
- No

Further Comments

13 Comments about the Glasgow hold.(The proposal is that this hold would be moved by 4.0nm from LANAK to RULUR) (Text input)

14 Comments about the new RNAV STARs connecting to the new Glasgow hold (Text input)

15 Comments about the ATS routes connecting to the Glasgow SIDs (Text input)

16 Comments about the ATS routes connecting to the Edinburgh SIDs (Text input)

17 Other Comments (Text input)

18 Upload a document. (gives the option to upload a document of further info if required)

9. Appendix B - response to Glasgow Airport



NATSResponseToEGPF(redacted).pdf

End of document