NATS

London Airspace Management Programme 2, Deployment 1.1

ACP-2017-70

Consultation Strategy

NATS Public

Roles

Action	Role	Date
Produced	**Manager Airspace Change Compliance & Delivery** Airspace and Future Operations	01/09/2021
Reviewed Approved	**Airspace Implementation Manager** Airspace and Future Operations	01/09/2021
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Drafting and Publication History

Issue	Month/Year	Changes this issue
1.0	07/2021	First issue for CAP1616 Stage 3 assessment gateway.
1.1	08/2021	Change to stakeholder mapping. Some ANSPs and airports changed to category 1.
1.2	09/2021	Changes in accordance with CAA Gateway actions and recommendations

References

Ref No	Description	Hyperlinks
1	LAMP D1.1 CAA web page – progress through CAP1616	Link to portal
2	Stage 1 Statement of Need	Link to document
4	Stage 1 Assessment Meeting Minutes	Link to document
5	Stage 1 Design Principles	Link to document
6	Stage 2 Design Options and Design Principle Evaluation	Link to document
7	Stage 2 Initial Options Appraisal and Safety Assessment	Link to document
8	Stage 3 Consultation Document	Link to portal, please navigate to Step 3b
9	Stage 3 Full Options Appraisal	Link to portal, please navigate to Step 3b
10	Airspace change: Guidance on the regulatory process for changing the notified airspace design and planned and permanent redistribution of air traffic, and on providing airspace information CAP1616	Link to document
11	Environmental requirements technical annex CAP1616A	Link to document
12	Definition of Overflight CAP1498	Link to document
13	Airspace Modernisation Strategy AMS CAP1711	Link to document
14	UK Government Department for Transport's 2017 Guidance to the CAA on its environmental objectives when carrying out its air navigation functions, and to the CAA and wider industry on airspace and noise management (abbreviated to ANG2017)	Link to document

Contents

1. Introduction and Overview

1.1. Consultation is an essential part of the airspace change process, defined in CAP1616 and regulated by the Civil Aviation Authority (CAA).

1.2. Consultation is the sponsor's opportunity to formally engage a wide variety of stakeholders, inform them of the benefits and impacts of the proposal in a transparent and accessible way, and to acquire valuable feedback to inform the final proposal.

1.3. The foundation of a good consultation is adherence to the four 'Gunning Principles', which set out the legal expectations for what constitutes an appropriate consultation:

- Should occur when proposals are at a formative stage
- Should give sufficient reasons for any proposal to permit intelligent consideration
- Should allow adequate time for consideration and response
- The product of consultation must be conscientiously taken into account

1.4. This document sets out our consultation strategy for LAMP Deployment 1.1 (LD1.1) in accordance with these Principles to ensure the consultation is effective and productive.

1.5. The CAA's airspace change process CAP1616 expects change sponsors to be mindful of the role of the Independent Commission on Civil Aviation Noise (ICCAN), and their best practice and advice. On 30th July 2020 ICCAN released a 'toolkit' for consulting on airspace change, via their website[1]. The LD1.1 consultation material is consistent with ICCAN guidance.

1.6. This consultation strategy covers LAMP Deployment 1.1 (LD1.1) (airspace from FL70-FL245/FL305[2]). It should be stressed that the overlying airspace is also being changed concurrently by the Free Route Airspace Deployment 2 ACP (airspace from FL245/FL305 – FL660). These two ACPs cover a common geographic region, will be subject to concurrent consultation and implemented simultaneously. Hence the consultation strategies of these two ACPs have been aligned and coordinated. The dependencies between the two ACPs dictate that they must be implemented simultaneously.

1.7. The LD1.1 ACP has been categorised as a Level 2a change, since there are no changes which would change flight profiles below 7,000ft.

2. How to read this document

2.1. This document provides information about how we will undertake this consultation. We want to provide relevant and appropriate information to the right people, in the right way, and enable them to provide informed responses to the proposed changes in a suitable timeframe.

2.2. We explain where we are in the **airspace change process**, and the objectives of this proposal.

2.3. We consider **who** may be impacted by the proposed changes. The audience comprises a number of different types of stakeholder; we will describe who they are and how we have classified them.

2.4. We describe **how** we plan to reach all the stakeholders to ensure they can respond effectively, including through engagement exercises.

2.5. We describe **what** we will use to inform stakeholders of the proposed plans. Materials will be as concise and accessible as possible for those without aviation or technical knowledge. We will provide sufficient detail to ensure respondents understand the issues. However, we will also be clear that airspace change is complex and that a time investment is necessary to understand the subject, and that some parts of the material are written for a technical aviation audience.

2.6. We consider **when** consultation should start and finish, and a planned timetable of activity. This will be a general overview to illustrate our intent, but specific dates have not been agreed at this time.

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[1] Link to ICCAN consultation toolkit: https://consultation-toolkit.iccan.gov.uk/
[2] Note: the division Flight Level (DFL) between LD1.1 and FRA is FL305 for Option 4 and FL245 for Option 6.

2.7. We briefly describe what happens when the consultation **ends**. There will be a period of analysis, and from that analysis we will understand any changes to the airspace design required in light of the feedback.

3. Where are we in the airspace change process?

3.1. NATS En Route Limited (NERL) is the sponsor of this proposal.

3.2. The airspace change process is summarised in the flowchart below.

3.3. We have completed Stage 1 Define, where we established the need for an airspace change. We also engaged representatives of stakeholder groups to agree the design principles underpinning this proposal.

3.4. We have completed Stage 2 Develop & Assess, where we created initial design concepts, refined them with feedback from representatives of stakeholder groups, evaluated each option against the design principles and performed an initial appraisal to illustrate the benefits and impacts of each option.
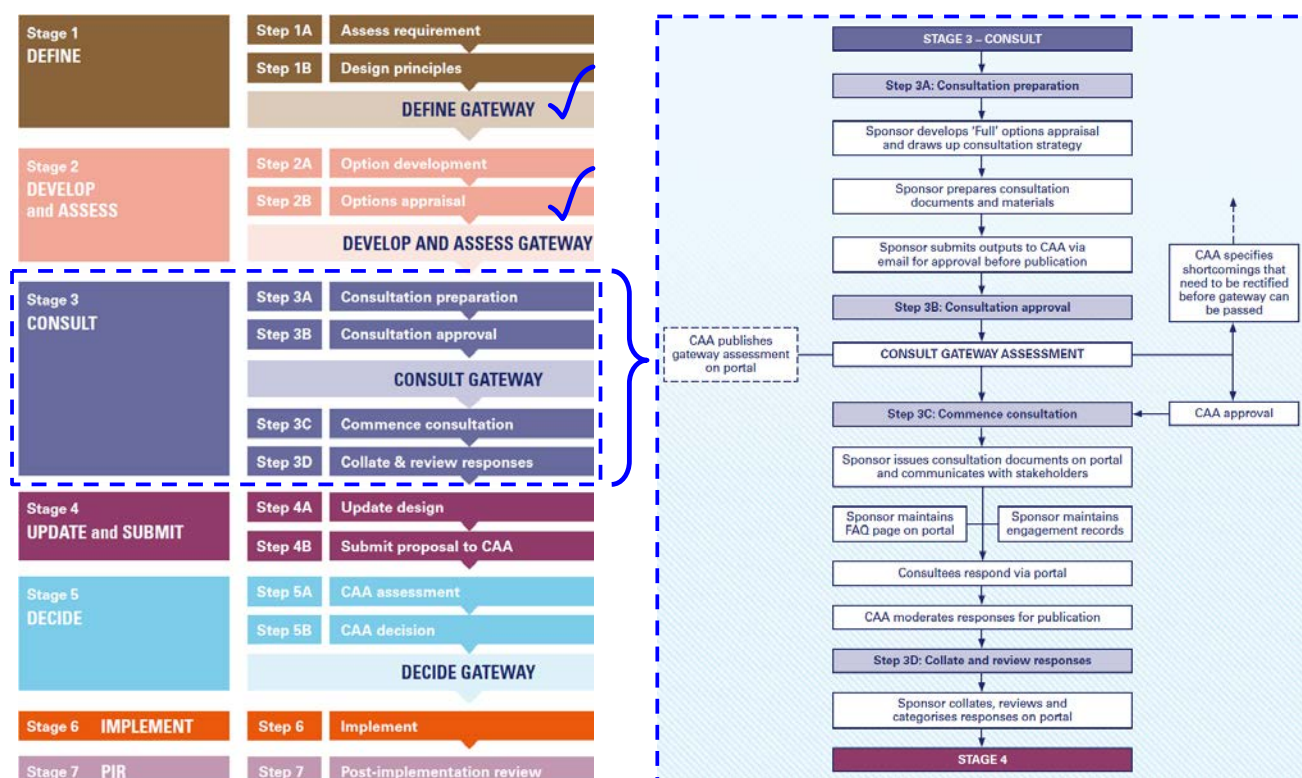
3.5. We are now in Stage 3 Consult.

Figure 1 Airspace Change Process – Overview (left) and Stage 3 Consult (right)

3.6. In the above flowcharts, this document forms part of Stage 3 Consult. It is designed to be read in conjunction with the Consultation Document (ref 10) and the Full Options Appraisal (ref 11) which are all Stage 3 documents.

3.7. Supporting documentation for all stages of this proposal (including Stage 1 and Stage 2) can be found on the CAA's airspace change portal at the following link:

https://airspacechange.caa.co.uk/PublicProposalArea?pID=40

4. Objectives of this proposal

4.1. Today's air traffic services (ATS) route network has evolved over time and does not fully exploit modern navigation technology. The objective of this project is to redesign the route network in accordance with the Civil Aviation Authority (CAA)'s Airspace Modernisation Strategy (AMS) using Performance Based Navigation (PBN).

4.2. The Statement of Need states the desired outcome is for "Optimal alignment and connectivity of the ATS route network with each airport's airspace structures, such that the network capacity should not be a significant constraint on airport capacity and environmental impacts are minimised."

4.3. The impact of the COVID-19 pandemic on airports and the wider aviation industry since March 2020 has resulted in delay to the roll-out of the Masterplan and AMS deployment and also to the development of proposals by Bristol, Cardiff & Exeter airports. As a result, the LD1.1 proposals will be implemented in advance of those of the airports. To facilitate this, another ACP has now been created (named LD1.2 ACP-2021-050), which will specifically address the network connection for new routes proposed by Bristol, Cardiff & Exeter Airports. This therefore de-couples the LD1.1 ACP (this ACP) from any dependency on those airports.

4.4. Despite the impact of the pandemic, there is a need for this change now as it will deliver operational and service performance improvements, and deliver airspace modernisation over a significant area of the UK network to build back better and support the recovery of the air travel industry.

4.5. The Design Principles (ref 5) developed with stakeholders at Stage 1, form a comprehensive list of objectives which the proposed design should aim to meet.

4.6. Due to the altitude of the proposed changes (above 7,000ft), assessment of environmental impacts is limited to CO_2 emissions. Because of the relationship between the FRA and LD1.1 airspace, the environmental benefits of both are presented together to allow the reader to understand the full picture of the individual and combined net effects.

4.7. Previous CAP1616 stages have summarised the design options development (Refs 6-7). The design options being progressed to consultation are:

- **LD1.1 Option 0.** Do nothing and maintain the current ATS route structure (baseline for comparison).
- **LD1.1 Option 4**. Systemisation using PBN routes based on 5nm radar separation environment with improved connectivity provided by direct routes with FRA above FL305.
- **LD1.1 Option 6**. Systemisation using PBN routes based on 5nm radar separation. Interfacing with Free Route Airspace (FRA) above FL245.

4.8. The "do nothing" option has been discounted as it does not fully meet several design principles (see Ref 6). There is still scope for feedback on the specific details of the design options upon which we are consulting – the removal of other options does not remove the scope for constructive feedback.

4.9. We want to ensure that stakeholders, who could be negatively or positively affected by these changes, are made aware of this airspace change proposal and given the opportunity to submit feedback about the designs.

4.10. Through our engagement activities undertaken so far, we have sought to ensure that:

- the correct audience is targeted in an appropriate manner, and given the opportunity to respond.
- the consultation materials provide stakeholders with enough detail to make an informed response;
- the duration of the consultation is appropriate.

5. Summary of engagement activity undertaken to date

5.1. During CAP1616 Stage 1 and Stage 2 we conducted informative and constructive engagement activities with a comprehensive list of stakeholder groups, summarised in the documentation supplied to progress through the two Assessment Gateways so far. These included representative groups of aviation stakeholders, industry groups and airports.

5.2. For full details of these earlier activities, see the CAA's airspace change portal Stage 2 Design Options and Design Principle Evaluation

5.3. Additional engagement activities have been carried out, post-Stage 2, with representatives of the Ministry of Defence, the General Aviation community and airports to help inform this strategy.

5.4. The stakeholder engagement summarised in the documents above, shows that appropriate 2-way engagement has taken place. Relevant stakeholders are fully aware of the proposed changes and have had an opportunity to shape the design principles and design options.

6.   Consultation Audience

6.1.   This ACP is proposing changes within controlled Class A & C airspace above 7000ft (FL70). As such, its stakeholders are an identified audience within the aviation industry.

6.2.   NATS will proactively seek to consult with all the stakeholders listed in Appendix A: List of Stakeholders, who will be invited to respond to the consultation.

6.3.   The list of affected stakeholders includes members of the National Air Traffic Management Advisory Committee (NATMAC), which includes many representatives of airspace users including airline operators, general aviation, sport aviation, RPAS/UAS operators and the MoD.

6.4.   Any other individual or organisation may submit a response to the consultation.

6.5.   Stakeholders were mapped according to the interest/influence as shown below. How stakeholders are categorised according to this matrix is indicated in Appendix A.
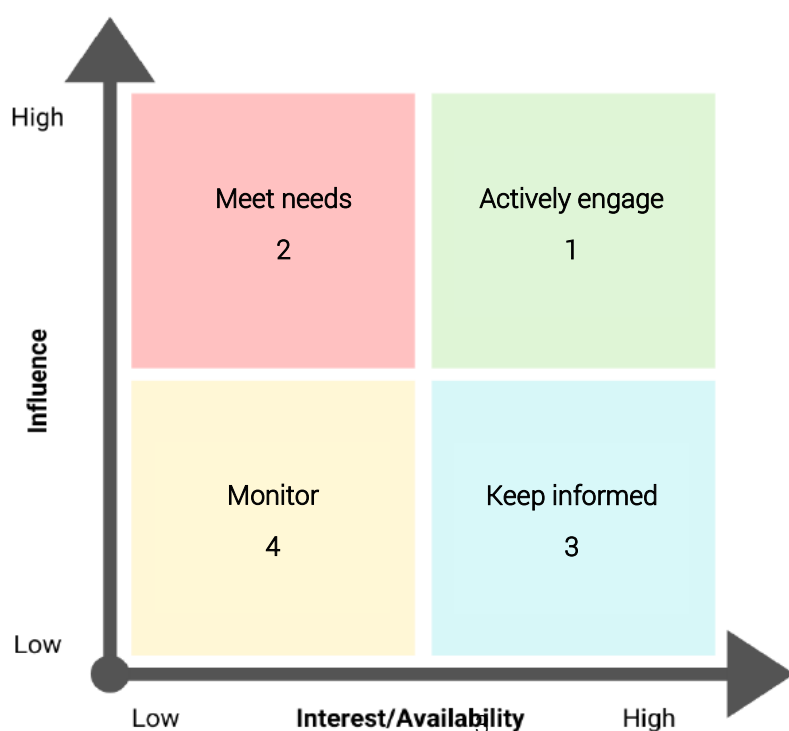

Figure 2 Stakeholder map

6.6.   This diagram maps interest against influence. The four boxes enable us to identify people and organisations who have (or should have) a high level of interest in a proposed change, against their level of influence. The key consideration is ensuring that all those who are likely to be impacted by an airspace change are identified, mapped in the correct box and engaged appropriately.

High influence/high interest (1) - Actively Engage

6.7.   Stakeholders mapped as high influence/high interest are generally representatives of airlines who operate within the airspace or airports organisations, and who would potentially be affected by the proposed flightpath changes.

6.8.   We will communicate primarily via email to inform the groups of the consultation, make the request to respond, and confirm any actions taken.

6.9.   This group will also include:

- Airlines

- Airports (e.g those with SIDs/STARs which would change)

- Military airspace users affected by the establishment of new controlled airspace via the MoD's Defence Airspace & Air Traffic Management (DAATM) representative

- Adjacent ANSPs with direct interface

- The British Gliding Association & General Aviation organisations

Low influence/high interest (2) - Meet Needs

6.10. This box can also include some aviation stakeholders who may use the region's airspace or have some aviation technical expertise.

6.11. Examples of aviation stakeholders in this box could include:

- Private pilots who fly their aircraft in the vicinity of the proposed new airspace

Stakeholders in this category can voluntarily contribute to the consultation and NATS will answer questions and engage as required. Feedback from all interested parties, including those not actively targeted by the consultation, will be welcomed and considered.

High influence/low interest (3) - Keep Informed

6.12. Stakeholders in this box are likely to be high profile individuals and organisations known to NATS but not affected by the proposals; they will be made aware of the consultation and kept informed about its progress.

6.13. These stakeholders will often be organisations representing airspace users and well-informed about its technicalities. Several have provided us with useful feedback to help inform this proposal from the start. They include:

- Adjacent ANSPs with no impact

- Nearby airports which may need to update aeronautical information due to this proposal[3]

- Specific local airspace user groups affected by the establishment of new controlled airspace

- National representative bodies of airspace user groups likely to be affected by the establishment of new controlled airspace or the disestablishment of current controlled airspace

The national representative bodies of airspace user groups will be asked to act as intermediaries to help communicate this consultation to affected stakeholders.

Low influence/low interest (4) - Monitor

6.14. Stakeholders in this box may not be known to NATS and will not be significantly adversely affected by the proposed changes. Examples include

- Data houses

- Flight plan providers

Mapping of all stakeholders according to these categorisations can be found in Annex A of this document.

7. Split of London Airspace Modernisation Programme 2 Deployment 1 ACP

7.1. The London Airspace Modernisation Programme 2 Deployment 1 (LD1) airspace change proposal (ACP) is the first stage of modernising the UK's airspace route network above 7,000ft across Wales and southwest England. LD1 is included in the Future Airspace Strategy Implementation - South (FASI-S) programme of changes and is part of a simpler, safer and more fuel-efficient future for air travel.

7.2. Prior to the COVID-19 pandemic LD1 was intended to be coordinated and implemented simultaneously with ACPs sponsored by Bristol, Cardiff and Exeter Airports. At that time, discussions were held between NATS and the CAA regarding whether the LD1 ACP, proposing changes to the enroute network, would

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[3] These would be technical amendments without causing changes to low altitude flight patterns for their airport

have any influence on the airports' low-level route designs. As this could not be ruled out, it was accepted that the LD1 network ACP would be categorised as a "scaled" Level 1[4].

7.3.　However, the impact of COVID-19 on air traffic resulted in airports pausing their ACPs for approximately 18 months. During this time, NATS continued work on LD1 due to the network benefits it can provide to its customers, including alignment with the deployment of Free Route Airspace (FRA) in the same area. This will enable benefits to be maximised and will reduce complexity for stakeholders during the ACP process. As a result, LD1 has progressed to a more advanced stage than the airports underlying the affected airspace, and a new approach was needed. This aims to address the risk of delaying airspace modernisation, while maintaining a co-ordinated approach. There are significant benefits from delivering the upper-level changes as early as possible, and it paves the way for other sponsors' ACPs in subsequent years. NATS has continued to engage with airports throughout the programme pause, to ensure a good understanding of their requirements.

7.4.　In order to allow the ACPs to progress and implement separately, the original ACP has been split to create two separate ACPs. This presented the right balance, giving flexibility to realise the benefits of systemised upper-airspace early, and ensure any network changes needed to accommodate airports' future design aspirations are also made when they are ready.

The two ACPs are:

1. **London Airspace Modernisation Programme 2 - Deployment 1.1** (Referred to as LD1.1). **(THIS ACP).** A network-only ACP, which will interface with the airports' existing traffic flows. (Target implementation spring 2023.) (ref ACP-2017-70 – this ACP). Design constraints associated with this ACP ensure that there is no prospect to influence the low-level route designs of the airports (below 7,000ft), hence it has been categorised as Level 2a.

2. **London Airspace Modernisation Programme 2 - Deployment 1.2** (Referred to as LD1.2) **(SEPARATE ACP implemented later)** ACP will be used to implement any further changes that may be required by airport ACPs subsequent to LD1.1. LD1.2 will be coordinated with the airports and the output from the airports may result in further changes as part of LD1.2. For example, network connection changes for any amended or new arrival/departure routes proposed by Bristol, Cardiff, or Exeter Airports. (ref ACP-2021-050). The LD1.2 ACP will progress as a scaled Level 1 (because it may have the potential to influence lateral aircraft tracks or dispersion below 7,000ft).

8.　Approach: How will we consult?

8.1.　The consultation will be hosted on the CAA Consultation Portal 'Citizen Space', a public online consultation platform for sharing information about Airspace Change Proposals. This holds relevant information for interested parties and stakeholders, including the Consultation Document which outlines the detail of the proposed changes and potential impacts.

8.2.　The portal also contains a link to the online response questionnaire, which will capture participants' responses. This portal will be active for the duration of the Consultation.

8.3.　Flights to/from the airports listed in Appendix A will use the airspace and benefit from the proposed changes. Many of these airports have been engaged during Stages 1 & 2, and all will be engaged during stage 3, consultation. This consultation is being run in parallel with the FRA D2 consultation due to the concurrent deployment dependency between the two ACPs (see section 9).

8.4.　A link to the consultation will be provided on the NATS Customer Affairs website, one of the information transfer mechanisms between NATS and our customer airlines. A link will also be provided on the NATS website, which is accessible to all.

8.5.　As consultation material is available online only, respondents will not be able to submit a postal response. We believe all targeted stakeholders in Appendix A will have internet access.

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[4] Under CAP 1616 the CAA categorises ACPs by assigning them a "Level", which in turn influences the process that is required to be followed. The Levels are primarily based on the altitude and area in which the changes occur and are defined in CAP1616 Table 2 (page 25).

8.6. We will run a series of webinars throughout the consultation window inviting specific stakeholders. These webinars will cover both the LD1.1 and FRA D2 proposals and will include a detailed presentation on the proposed changes and a Q&A to allow any specific questions to be answered directly.

8.7. Stakeholders mapped to high influence/high interest will be actively engaged with briefings.

8.8. Those in the other 3 quadrants will be kept involved/informed and have the opportunity to join an open webinar briefing. Due to the varied audience these briefings will be more general in nature with the opportunity for specific or geographic questions to be raised in the Q&A session.

8.9. We will aim to hold a minimum of two open sessions and one for each of the "actively engage" stakeholder groups.

8.10. We will respond positively to requests for 1:1 meetings and these meetings will be demand led. This means if a particular stakeholder asks for further information, we will run new webinars, for example, if it becomes clear that there are particular geographic requests.

Stakeholder	Number of webinars
Open sessions[5]	2
Airlines	1
GA/BGA	1
Heathrow/Luton/City/Gatwick	1
Bristol/Cardiff/Exeter Airports	1
DAATM	1
Brest/IAA/Channel Is ANSPs	1

8.11. At the end of consultation, the responses will be analysed and themed; any late responses may not be included in the subsequent analysis.

8.12. In the event of any unexpected challenges or events, we will communicate directly with stakeholders.

8.13. Due to the ongoing impact of the pandemic the primary method for providing information, engaging with stakeholders, and gathering feedback during this consultation will be online. We do not plan to hold face-to-face events given social distancing requirements and restrictions relating to public gatherings. However, we have experience in running interactive webinars where participants can watch a presentation and then ask questions directly to the experts.

8.14. The aviation world generally uses English to communicate, and our consultation is targeting aviation experts. We will provide information in English on the basis that stakeholders whose first language is not English will be competent enough in the language to make an informed response and could also translate these using software such as Google translate. According to Google's tests, the accuracy of the translation depends on the languages translated. The test required mother-tongue language speakers to rate Google Translate with a scale between 0 and 6. The average rating[6] achieved was 5.43. We believe this to be sufficient for the purpose intended.

[5] More to be added if there is demand.

[6] Google translation rating ([link])

9. Link with FRA D2

9.1.   The LD1.1 consultation is being run in parallel with that of Free Route Airspace Deployment 2 (FRA D2, ACP-2019-12). The two consultations will have the same start and end dates, the same stakeholders and geographical area of coverage. The changes for LD1.1 and FRA D2 will be implemented simultaneously on the same date. This is because there are dependencies between the two ACPs[7], these are outlined clearly in the consultation material and an FAQ document. If there is a delay to either ACP this will also delay the other. By consulting on these two related ACPs at the same time it will reduce the burden on stakeholders, it will assist stakeholder understanding of how the overall airspace system will operate, cumulative impacts can be more easily explained/understood, and stakeholder fatigue should be avoided.

10. Consultation materials

10.1.   Our primary stakeholders are considered to be an aviation expert audience; therefore, aviation technical language will be used in the consultation material, in English only. We plan to conduct the consultation via the internet (including email and the online consultation portal).

10.2.   The online consultation portal (see para 7.1) will include an overview of the proposed changes and the consultation materials. The primary materials will be the Consultation Document (which will be available for download from the portal) and a Response Questionnaire which will allow users to submit feedback.

10.3.   Consultation Document: This will contain information which will enable stakeholders to make an informed response to the proposed changes, including:

- aims and objectives of the change
- description of the current relevant airspace
- proposed changes and design options - including specifying NATS' preferred design option
- potential impacts of the proposal – aimed at aviation stakeholders
- information on the consultation process - how to respond; what happens next
- references to further sources of information
- a reversion statement outlining what could be done if issues happen post-implementation

10.4.   Supporting documents:

- This Consultation Strategy document
- Full Options Appraisal document
- Consultation FAQs document
- FRA D2 consultation material set
- Reference material such as CAA CAPs & DfT ANG.

10.5.   Response Questionnaire: The Response Questionnaire seeks to capture feedback on the proposed options. It will also capture information on the respondent. Some of this will be mandatory (such as organisation being represented) and others optional (such as a postcode).

10.6.   Questions & Answers we receive during the consultation will be captured in a Frequently Asked Questions (FAQ) document. This will be updated with answers to additional questions that arise during consultation to ensure all stakeholders have sight of these.

10.7.   The Consultation Document uses data drawn from the Full Options Appraisal document. A standard environmental analysis focusing on the enabled CO_2 impacts has been completed for the proposed change. No analysis relating to noise has been completed because the altitude of the proposed changes

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[7] LD1.1 cannot be implemented independent of FRA because there are no routes proposed above FL245/305 and no routes in sector 9. Existing routes in sector 9 do not align to the route structure proposed in the LD1.1 ACP. FRA D2 cannot be implemented independent of the LD1.1 ACP because the structural limitation, FRA significant points etc are based on the LD1.1 ACP design options.

is above 7000ft, i.e. too high for noise impact to change significantly at ground level. This is in accordance with Government guidance ANG2017 (ref 14). (See also section 7)

10.8. For all analyses the most up-to-date, credible information and appropriate forecasts are used. The traffic is grown according to the May 21 STATFOR forecast (provided by Eurocontrol), extended to 10 years by NATS forecasting.

11. Consultation length, and illustrative timeline of activities

Consultation Duration

11.1. The proposed consultation launch date is Monday 6th September 2021 at 0001. The closing date is Monday 29th November 2021 at 2359, this is a duration of twelve weeks and one day.

11.2. During all stages of the CAP1616 process to date the majority of stakeholders in Appendix A have been engaged and they are familiar with the ACP. Due scale of the changes involved the consultation will be for a duration of twelve weeks. This is considered sufficient, proportionate and is in accordance with the cabinet office guidelines for consultation[8].

Launch, and the first two weeks

11.3. Email to identified stakeholders on the day of launch (Appendix A), this will inform stakeholders of the LD1.1 and FRA D2 consultations and include a link to the consultation websites for both ACPs.

The core engagement period

11.4. The period from September to the end of October is the core engagement period. At the mid-point we will directly contact those known stakeholders who are yet to respond, to remind them of the end-date and encourage them to respond before the consultation ends.

11.5. A minimum of two webinar meetings, open to all, will be held during the consultation period. Other meetings will be scheduled for engagement with high interest, high influence stakeholder groups. The schedule of meetings will be flexible, and meetings may be moved, added or removed as appropriate according to demand and availability of stakeholders. See table in 8.11.

Approaching the end of the consultation

11.6. A final reminder will be issued in week eleven of the consultation period. We will contact known stakeholders (yet to respond) directly, to give a final reminder that the opportunity to respond is now limited.

11.7. The consultation will close on 29th November 2021 at 2359 BST.

12. Responding to the Consultation

The CAA Airspace Change Portal

12.1. We expect access to the consultation, including responses, to be managed via the CAA's airspace change portal. Its unique reference link (URL) is:
https://consultations.airspacechange.co.uk/nats/ld1-1

12.2. The portal will present the consultation materials in a format which is easily accessible and if stakeholders require further information they can drill down into further levels of detail and analysis. A copy of the Consultation Document (for viewing on screen or for downloading to print) will be available, and an online survey to capture feedback. The Full Options Appraisal and this Strategy document will also be available to download.

12.3. The online survey will automatically acknowledge responses by sending a completion message back to the user, via the contact email address provided by the respondent. Relevant GDPR statements will be included in areas of data capture such as consultation response submission.

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[8] Cabinet Office Consultation Principles 2018

12.4. Responses to the survey will be moderated and published on the portal.

12.5. The CAA requires all responses to the consultation to be published on their airspace change portal. Therefore, responses should be self-input by the stakeholder via the online survey. All stakeholders expected to participate in this consultation will have internet access[9].

12.6. The online response questionnaires will highlight which questions are mandatory or optional, but all stakeholders will be able to respond to all questions.

13. After the consultation ends

13.1. We will carry out a transparent and comprehensive review and categorisation of consultation responses as they arrive, in accordance with a theming framework, helping us to understand and quantify the feedback. Early responses will inform and develop our categorisation framework.

13.2. This categorisation of results will reveal themes and information which may lead to a change in the proposed design, and other themes and information which would not lead to a change.

13.3. We will publish a report, under Step 3D of the CAP1616 process, which summarises the results into these two categories. This is the first consultation feedback report.

13.4. Next we will thoroughly review the items which may lead to a change in the proposed design and consider whether each item will or will not lead to an actual change – reasons will be provided either way, and the output will become the second consultation feedback report. We will also publish the revised final design, and complete a final options appraisal based on that revised design.

13.5. These three documents comprise Step 4A of the CAP1616 process and will be followed by the formal application for an airspace change proposal under Step 4B.

13.6. Post consultation we will update the options appraisal to the Final version. If the options appraisal reveals that the impact of the design has changed fundamentally, we will discuss with the CAA whether we must undertake a limited additional period of consultation.

14. Reversion Statement

14.1. We consider the designs presented in this consultation to be the 'do minimum' option. The 'do nothing' option has been discounted at the previous Stage of the process, however doing nothing is used as the baseline for comparison.

14.2. Should the proposal be approved and implemented, it would be extremely difficult to revert to the pre-implementation state. This is due to the reduction in complexity and controller workload this proposal is designed to bring to the region, increasing its capacity.

14.3. In the unlikely event of unexpected issues caused by this proposal, short notice changes could be made via NOTAM or by adding Route Availability Document (RAD) restrictions. Direct reversion to the pre-existing arrangements could not occur. Any long-term issues identified would need to be resolved at the post-implementation review (PIR) stage.

15. Conclusion

15.1. We consider this consultation strategy to be reasonable, proportionate and robust. We will manage the consultation in accordance with this strategy, which has been prepared to ensure the greatest likelihood of success.

15.2. We have identified the relevant stakeholders; have engaged with those most likely to be impacted. We have made it clear that there is scope to change the proposal based on their feedback.

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[9] NATS has catered for postal responses in previous CAP1616 ACP consultations. However, no postal responses have been received during Level 2 consultations. Hence this is considered proportionate.

15.3. Subject to passing the Stage 3 Gateway Assessment, we will finalise the consultation material; set up the appropriate material on the CAA Citizen Space consultation portal and launch the consultation with stakeholders via email.

Appendix A: List of Stakeholders

Links to the consultation will be placed on the NATS Customer Website and also on the NATS public website. Any individual or organisation may submit a response; however, we are specifically targeting the aviation organisations discussed in this document.

The consultation is most relevant to the stakeholders listed below – who will all be emailed a notification and sent links to the consultation website. However consultation is not exclusive to this list, any stakeholder or individual can participate.

Stakeholders have been categorised below according to the mapping described in Section 6.3, where:

1=High Influence/High Interest; 2=High Influence/Low Interest; 3=Low Influence/High Interest; 4= Low influence/Low Interest

Airlines (all 1)

Aer Lingus	Emirates	Norwegian Air
Air Canada	Etihad	Novair
Air France	Eurowings	Qantas
Air New Zealand	FedEx	Qatar Airways
Air Transat	FinnAir	Ryanair
American Airlines	Fly Dubai	SAS
Aurigny Airlines	Gamma Aviation	Saudia
Austrian Airlines	German Wings	Singapore Air
Azerbaijan Airlines	Gulf Air	South Africa Airways
BA Cityflyer	Iberia	Tag Aviation
Blue Islands	Iceland Air	TAP Air Portugal
British Airways	JetBlue	Thomson/ TUI
Cathay Pacific	Jet2	Turkish Airlines
Cityjet	KLM	United Airlines
Delta Airways	Logan Air	UPS Europe
DHL	Lufthansa	Virgin Airlines
Eastern Airways	Malaysia Airlines	West Jet
EasyJet	Middle East Airlines	WizzAir
	NetJets	

Air Navigation Service Providers (ANSPs) (all 3 unless marked)

Direction des Services de la Navigation Aérienne (DSNA) (France)	Maastricht Upper Area Control (MUAC)
DSNA ACC Brest (France) (1)	Eurocontrol Central Flow Management Unit (CFMU)
DSNA ACC Reims (France)	Irish Aviation Authority (IAA) (Ireland) (1)
DSNA ACC Paris (France)	RAF(U) Swanwick (UK Royal Air Force) (1)

Data Houses/ Flight-planning providers (all 4)

Air Support	Sabre
Aviation Cloud	
Flight Keys	
Lido	
Jeppesen	
Lufthansa Systems	
NavBlue	

Relevant NATMAC Members (4 unless marked)

Airlines UK
Airspace4All (formerly FASVIG)
Aviation Environment Federation (AEF)
Airport Operators Association (AOA)
Aircraft Owners & Pilots Association (AOPA UK)
Association of Remotely Piloted Aircraft Systems (ARPAS UK)
BAE Systems
British Airline Pilots Association (BALPA)
British Air Transport Association (BATA)
British Balloon & Airship Club (BBAC)
British Business & General Aviation Association (BBGA)
British Gliding Association (BGA) (1)
British Helicopter Association (BHA)
British Hang Gliding & Paragliding Association (BHPA)

British Microlight Aircraft Association (BMAA)
British Skydiving
Drone Major
European UAV Systems Centre Ltd
General Aviation Safety Council (GASCo)
General Aviation Alliance (GAA) (1)
Guild of Air Traffic Control Officers (GATCO)
Helicopter Club of Great Britain (HCGB)
Heavy Airlines
Honourable Company of Air Pilots
Iprosurv drone pilot network
Light Aircraft Association (LAA)
Light Airlines
Low Fares Airlines (LFA)
Ministry of Defence (MoD) via the Defence Airspace and Air Traffic Management (DAATM) (1)
PPL/ IR Europe

Airports[10] (3 unless marked)

EGGD   Bristol (1)
EGFF   Cardiff (1)
EGTE   Exeter (1)
EGHI   Southampton (1)
EGHH   Bournemouth (1)
EGGW   Luton (1)
EGSS   Stansted (1)
EGKK   Gatwick (1)
EGLL   Heathrow (1)
EGLC   London City (1)
EGWU   Northolt (via DAATM)
EGBB   Birmingham
EGCC   Manchester (1)

EGLF   Farnborough (1)
EGMC   Southend
EGKB   Biggin Hill
EGNH   Blackpool
EGFH   Swansea
EGBJ   Gloucester
EGBP   Kemble (Cotswold)
EGTK   Oxford
EGHQ   Newquay
EGTP   Perranporth
EGVN   Brize Norton (via DAATM)
EGTU   Dunkeswell
EGGP   Liverpool (1)

Other (all 4)

Airlines for America
AIRE (Airlines International Representation in Europe)
Airline Operators Committee Heathrow (AOC Heathrow)
Board of Airline Representatives (BAR)
Bristow Helicopters (HM Coastguard)
Direction de la Securities de l'Aviation Civile (DSAC)
Direction du Transport Aérien (DTA)
French Air and Space Force

IATA
IATA- Heathrow AOC
Irish Air Corps
Ports of Jersey SATCO
QinetiQ
United Kingdom Space Agency (UKSA)
Virgin Orbit Ltd

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[10] MoD Airfields are not included since consideration of these is incorporated in the DAATM joint response.