

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

SAIP AD4
Documentation:
Stage 3 Consult

Step 3D Collate and Review Responses

The NATS logo is positioned on the right side of the page. It consists of the word "NATS" in a bold, italicized, blue sans-serif font. The letters have a slight gradient and shadow effect. The logo is set against a background of two parallel, light blue curved lines that sweep from the top left towards the bottom right, framing the logo.

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Issue 1	Jun 2018	Submitted to CAA for publication

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 2 Design Options	Link
6	Stage 2 Design Principle Evaluation	Link
7	Stage 2 Initial Options Safety Appraisal	Link
8	Stage 3 Consultation Strategy	Link
9	Stage 3 Options Appraisal	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 a focussed consultation on a proposed airspace change. This would re-align some ATS routes over eastern England and the southern North Sea towards the air traffic interface with the Dutch.
- 2.2 The timeline for this proposed airspace change is fixed to align with Maastricht Upper Area Control (MUAC) Delta sector's Free Route Airspace implementation, on the 6th December 2018 (AIRAC13-2018).
- 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 9 airlines and the MoD were specifically targeted for this consultation. A further 12 airlines – less frequent users of the airspace region – were also sent the consultation material and invited to respond. See Section 7 Annex A – List of Stakeholders. A description of engagement activities and reasoning behind why these specific stakeholders were targeted can be found in the consultation strategy document (Ref 8).
- 2.6 All stakeholders were sent a reminder email prior to the consultation as well as a notification email to inform them when the consultation was live. This included information on how to respond via the online portal and the consultation document attached. Throughout the consultation, additional 'chase' emails were sent to those which had not responded at the time.
- 2.7 The consultation has been conducted via an online portal which included an overview into the proposed changes, the consultation document available for download and a survey which allowed users to submit their feedback. See Section 8 Annex B – 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. A link was also provided on the public NATS.aero website.
- 2.9 The consultation commenced on Wednesday 2nd May 2018 and ended on Wednesday 30th May 2018; a period of 4 weeks.
- 2.10 Responses have been managed, moderated and uploaded to the portal by the CAA.

3. Summary of Consultation Responses

- 3.1 We received fourteen responses. Six of our nine targeted stakeholders responded, plus the MoD which is a mandatory stakeholder.
- 3.2 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 were:

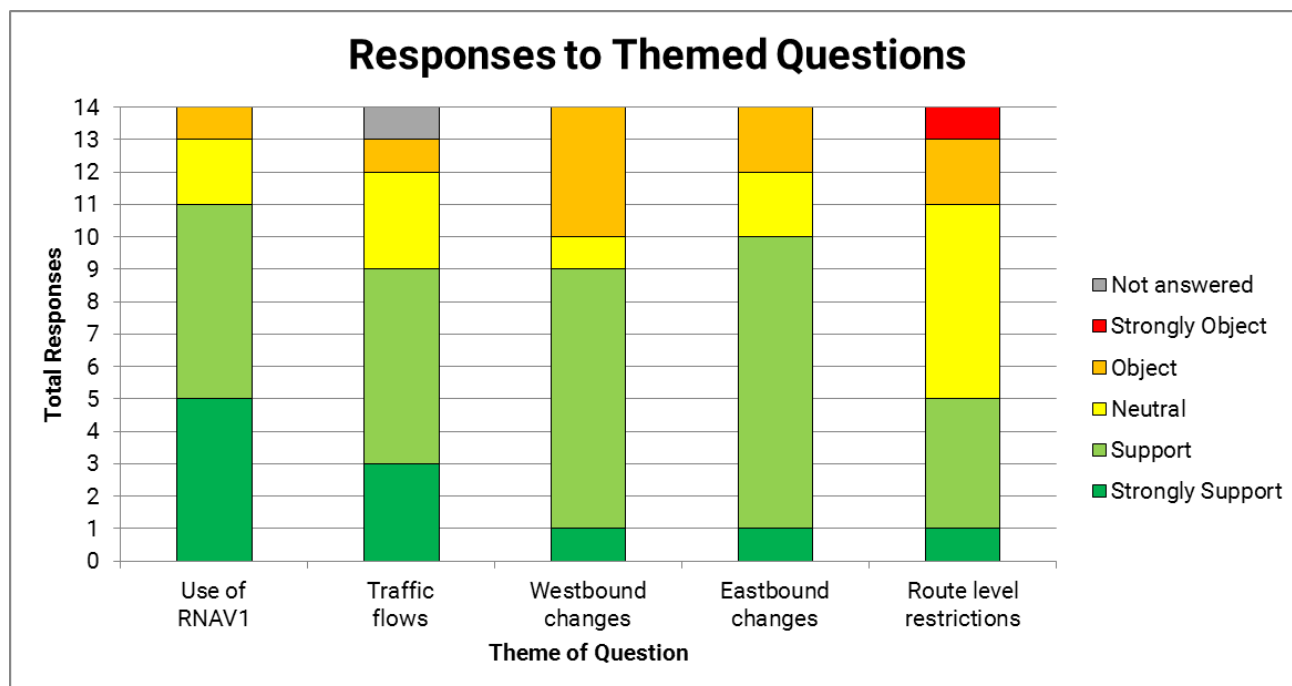


Figure 1 Responses to themed questions ‘to what extent do you support...’

- 3.4 The majority of respondents showed support for the first four specific elements of the proposal, with the majority either supporting or feeling neutral about the fifth element.
- 3.5 Some airlines responded that the increase in track miles / fuel is an acceptable cost given the planned capacity benefit, and mentioned that the proposed eastbound improvements did not fully offset the westbound disbenefit.
- 3.6 Two of our targeted airlines commented that there was a good level of engagement; one commented that the information supplied could’ve been better suited to their needs.
- 3.7 One member of the public responded with concerns about the airspace change consultation process.

4. Categorisation of Consultation Responses and Themes

- 4.1 The fourteen 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) – three elements;
- 4.2.2 Those which do not have that potential – the remaining comments and elements.
- 4.3 This approach complies with the CAP1616 “we asked, you said, we did” consultation approach. This Step 3D document details “we asked, you said”. A separately published Step 4A document 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
easyJet NATS ref AD4-003 Consultation website ref Response 3315842	Requests to improve the westbound routes arriving at, and eastbound routes departing from, Southend (EGMC).	Westbound changes Eastbound changes Route level restrictions	<p>Under the consultation, westbound traffic from the Amsterdam FIR routing to EGMC enter the network at the central westbound waypoint, dogleg left (southwest) onto the southernmost flow, then dogleg back (northwest) onto the central flow to join the STAR.</p> <p>Under the consultation, east/northeastbound EGMC deps all route via CLN at all FLs with NE-bound traffic routing via SOMVA before turning NE.</p>	<p>Element 1 EGMC arrivals: Ongoing discussions between NATS and LVNL mean that such traffic FL200– may be able to continue down the central flow instead of making the two doglegs, reducing the track mileage disbenefit, potentially for airports EGMC EGLC and EGKB</p> <p>Element 2 EGMC departures: There may be advantages in routing lower-FL EGMC deps via CLN-REDFA and higher-FL EGMC deps DAGGA-GASBA-REDFA to get the higher-FL deps onto preferred M197 route even though there is a slight dogleg, as climb should be more continuous. EGMC deps to SOMVA (east) and LEDBO (northeast) may be better served for climb via DAGGA before turning east or northeast.</p>
KLM Royal Dutch Airlines NATS ref AD4-005 Consultation website ref Response 150448738	Comment on the fuel burn increase from westbound changes not being offset by eastbound improvements.	Eastbound changes	The consultation was mainly limited to eastbound flows from the vicinity of BPK to the Dutch FIR boundary.	Element 3 There may be opportunities to make minor amendments to some ATS routes (no change below 7,000ft) west of CLN and around BPK to further improve connectivity with the revised eastbound flow structure, potentially shaving more mileage from flightplanned routes.

- 4.6 These three 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
Eurocontrol MUAC NATS ref AD4-023 Consultation website ref Dirk De Herdt	<p>Statement that this is a joint development</p> <p>Helps enable free route airspace east of the FIR boundary, reducing complexity and increasing capacity</p>	Traffic flows, westbound, eastbound, level restrictions, capacity, complexity	<p>No comments regarding new info or ideas</p> <p>General support</p>	N/A
FlyBe NATS ref AD4-009 Consultation website ref Paul Wakeford	<p>Appropriate engagement and supportive of the proposal</p> <p>Statements of predicted fuel increase based on pre-consultation engagement</p> <p>Increasing capacity reduces likelihood of flow regulation</p> <p>Enabler for future free route concepts</p>	RNAV1, traffic flows, westbound, capacity, environmental disbenefit	<p>No comments regarding new info or ideas</p> <p>General support</p>	Consider future changes to airspace in the region/ East Anglia which may allow more direct routes for the Midlands
Scandinavian Air System SAS NATS ref AD4-007 Consultation website ref Jens Albek	Ambivalence given that their traffic may be impacted by increased track miles westbound, and the use of RAD restrictions to enforce flows.	RNAV1, traffic flows, westbound, eastbound	No comments regarding new info or ideas	<p>This response was manually input.</p> <p>NATS replied to individual comments. These were embedded within the original stakeholder comments for all to see.</p>
BA Cityflyer NATS ref AD4-002 Consultation website ref David Leach	<p>Appropriate engagement and supportive of the proposal</p> <p>The cost is worth the benefit</p>	RNAV1, traffic flows, westbound, eastbound, level restrictions, capacity, environmental disbenefit	<p>No comments regarding new info or ideas</p> <p>General support</p>	<p>Request to work on improvements to some departure tracks.</p> <p>Separate proposals are being developed in parallel to this ACP to truncate some SIDs in association with this proposal, in order to partially offset fuel disbenefit</p>
Ministry of Defence NATS ref AD4-010 Consultation website ref Response 38122329	<p>Amendments made due to the consultation to be discussed with DAATM prior to CAA submission</p> <p>No objection</p>	N/A	No comments regarding new info or ideas	Direct phone call from NATS to DAATM (06/06/18) explaining that this Step 3D document will satisfy their request, and they will continue to be notified of the ACP process
Member of Public NATS ref AD4-025 Consultation website ref Tim Henderson	<p>Concerns relating to a perceived lack of consultation process; both in length and those targeted</p> <p>Argued that the proposed eastbound route changes would introduce a noticeable noise impact and failed to assess impacts on tranquillity</p> <p>Concentration of traffic, and respite</p> <p>Reference to 2008 Suffolk-based campaign against flightpath changes</p>	RNAV1, westbound, eastbound, level restrictions	No comments regarding new info or ideas	<p>The CAA agreed with NATS' assessment at Stages 1, 2 and 3 of the CAP1616 process, that this was a Level 2 proposal where noise impacts are not a priority due to the higher altitude nature of the changes</p> <p>The airspace change process has been fully complied with to this stage, by passing the Gateways up to this point</p>

(table continued)

Response type and reference	Summary of Comments	Themes of comment	Why the proposal is not impacted	Any relevant considerations/ feedback
<p>KLM Royal Dutch Airlines NATS ref AD4-005 Consultation website ref Response 150448738</p>	<p>Several comments mentioning lack of information on certain topics</p> <ul style="list-style-type: none"> - Non-equipped aircraft scenarios - Improved level capping - Improved capacity in relation to STATFOR predictions - Level restrictions <p>Did not feel that airlines were involved enough in the decision process. The disadvantages of these changes (fuel, emissions, charges) primarily impact airlines, not ANSPs.</p>	<p>RNAV1, traffic flows, westbound, eastbound, capacity, environmental disbenefit</p>	<p>No comments regarding new info or ideas</p>	<p>Westbound access to the region for non-RNAV1 flights was shown in the consultation material by white arrows illustrating the directions from which they may flightplan – this would be difficult for an EHAM-based airline.</p> <p>Should an aircraft established in flight on RNAV1 routes have an equipment degradation such that they cannot continue to conform to RNAV1, informing ATC would result in radar vectoring to a suitable destination (this would be the same for any nav failure).</p> <p>Level restriction info was shown in the tables below the flow diagrams.</p> <p>We believe the level of information supplied and the justification is fit for purpose, however we will take these comments on board for future proposals.</p>
<p>Virgin Atlantic NATS ref AD4-022 Consultation website ref Ian Roy</p>	<p>General support to the concept of systemisation</p> <p>Discussion of balance between westbound disbenefit vs eastbound benefit</p> <p>Concern re Heathrow arrival fuel burn</p>	<p>RNAV1, westbound, eastbound, environmental disbenefit</p>	<p>No comments regarding new info or ideas</p>	<p>We believe the level of information supplied is fit for purpose, however we will take these comments on board for future proposals.</p>
<p>Wizz Air NATS ref AD4-008 Consultation website ref Response 485604674</p>	<p>General support</p> <p>The cost is likely to be worth the benefit</p> <p>Objection to route level restriction – NATS is unclear on this objection as the consultation material specified “all FLs” for typical WZZ arrivals via the northern westbound flow</p>			<p>WZZ commented:</p> <p>If we have understood this correctly as restrictions on being able to fly at our optimum level then we would have to strongly object</p> <p>NATS replies:</p> <p>We have recorded “strongly object” as WZZ’s response but we are happy to confirm there would be no change to current levels for typical WZZ flights under this proposal</p>

5. Conclusion and Next Steps

- 5.1 We will consider the three elements received as per table 4.5 and may update the final design.
- 5.2 This document will be published onto the SAIP AD4 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 write the formal Step 4B Airspace Change Proposal and submit that 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, 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 was noted in the consultation material.
- 6.2 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.

7. Annex A – List of Stakeholders

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

One member of the public responded.

The consultation was most relevant to the stakeholders listed below, but not exclusively.

Mandatory Stakeholder:

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

Primary Target Stakeholders:

These nine air operators were engaged during the consultation and their response actively sought, each was emailed several times with reminders of the closing date.

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 were informed of the consultation and were encouraged to respond, reminder emails were also sent.

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

8. Annex B – Online Portal Questions

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

1. What is your name? *(Mandatory)*
2. Please enter your postcode, UK only. (Most relevant to your response home/ work/ organisation etc.) *(Optional)*
3. If you are based outside of the UK, please enter an equivalent postal code or location descriptor. *(Optional)*
4. Who are you representing? *(Mandatory)*
 - a. I am responding as an individual (If the user selects this, Q6–8 will not be provided)
 - b. I am responding on behalf of an organisation (If the user selects this, Q6–8 will be provided)
5. Please note all responses will be published. Are you happy for your name to be included in the response publication? *(Mandatory)*
 - a. Yes – I want my response to be published with my name
 - b. No – I want my response to be published anonymously
6. What is your organisation name? *(Mandatory – if answered “b” to Q4)*
7. What is your position/ title? *(Optional)*
8. If you are representing an airline, do you know how much of your fleet is RNAV1 equipped? (Please leave blank if you do not represent an airline. Otherwise please provide a percentage estimate if you can). *(Optional)*
9. Do you support the airspace changes in this proposal? *(Mandatory)*
 - a. SUPPORT – I support the proposed changes
 - b. NO COMMENT – I neither support or object
 - c. AMBIVALENT – I have mixed feelings
 - d. OBJECT – I object to the proposed changes
10. Please rank your reaction to the individual aspects. *(Optional)*
(Options available: Strongly Support/ Support/ Neutral/ Object/ Strongly Object)
 - a. Use of RNAV1
 - b. Segregation and distribution of traffic flows
 - c. Westbound changes
 - d. Eastbound changes
 - e. Route level restrictions
11. Please give your feedback comments on the overall proposal. *(Optional)*
12. Would you like to make more comments on any individual aspects? *(Mandatory)*
 - a. Yes (If the user selects this, Q13-18 will be provided)
 - b. No (If the user selects this, Q13-18 will not be provided)
13. Comments about the proposed use of RNAV1 routes *(Optional)*
14. Comments about the proposed traffic flows *(Optional)*
15. Comments about the westbound route changes *(Optional)*
16. Comments about the eastbound route changes *(Optional)*
17. Comments about the route level restrictions *(Optional)*
18. Other comments. *(Optional)*
19. Upload a document. (Please click here if you wish to upload a file. This can be a response document or related evidence). *(Optional)*

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