

CAP1616 Gateway documentation  
Stage 1: Define Gateway

Design Principles  
Revised Position of ATS route Y124

V1.2

The NATS logo is displayed in a bold, italicized, blue sans-serif font. It is positioned on the right side of the page, above a large, decorative blue graphic element that consists of two parallel lines curving downwards and then back up to the right.

**NATS Uncontrolled**

Publication history

Issue	Month/Year	Change Requests in this issue
Issue 1.0	Oct 2019	First issue submitted to the CAA
Issue 1.1	Oct 2019	Updated following feedback from the CAA; the following sections were updated: <ul style="list-style-type: none"> <li>- Generic SARG/ DfT design requirements removed, could cause confusion against the Design Principles</li> <li>- Updated wording in Sections 1.4 – 1.5 to explain the required ANSP agreement</li> <li>- Appendix A updated to include the email which was sent out to stakeholders</li> </ul>
Issue 1.2	Oct 2019	Inclusion of additional stakeholder engagement evidence

Contents

1. Introduction.....	3
2. Airspace Design Principles (DP) and Evaluation .....	4
3. Stakeholder Engagement in Developing Design Principles.....	5
4. References .....	7
5. Appendix A: Stakeholder Engagement Evidence .....	7
6. Appendix B: Stakeholder Engagement Feedback.....	8

## 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 1 Define Gateway, Step 1B Design Principles.

1.3 This project relates to ATS route Y124 which crosses the UK-Ireland FIR boundary in the Irish Sea.

1.4 As part of this cross-border collaboration, there are ongoing negotiations and inter-ANSP operational development agreements between NATS and the Irish Aviation Authority (IAA). NATS have undertaken design work in consideration of the planned Dublin implementation timescales. Following early engagement with MOD and at their request NATS have commenced two ACPs for work associated with Dublin Airspace project (this ACP for Y124 and another for changes to Q36/Q37).

1.5 There must be agreement between both ANSPs that the design concept being progressed suits all operations.

1.6 The following Statement of Need was submitted to the CAA in March 2019:  
Traffic over the Irish Sea has continued to experience high demand throughout the day. The implementation of parallel RNAV1 ATS routes in November 2017 has assisted in reducing controller workload (by removing complexity) and raising capacity. However, the Dublin Airport Authority has embarked on the Dublin Airspace Project to develop and implement a 2<sup>nd</sup> parallel runway which will create additional demand from 2021 onwards. This demand will place additional pressure on the Isle of Man (IoM) and Swanwick S7 ATC sectors, in addition to further demands on the wider route network.

The forecast growth and additional runway at Dublin presents an opportunity to review and further modernise the airspace in the North Wales and Irish Sea areas that interface with Irish airspace, as part of the CAA Airspace Modernisation Strategy. This should include the airspace sharing arrangements with the MoD, to ensure that the airspace design is optimised and able to accommodate the forecast demand in the region.

The impact on MOD/QinetiQ operations is dependent on the requirements of Special Use Airspace. The current CAA Safety Buffer Policy for Airspace Design (Ref 1) is undergoing review, however, this along with the CAA CAS Containment Policy (Ref 2) is used to determine route positioning as part of airspace design process. Changes will be required to the COPs<sup>1</sup> on the UK/Ireland FIR boundary. A separate Statement of Need captures this requirement for Q36 & Q37. The Temporary Reserved Area (Gliding) (TRA(G)) Welsh Gliding Area will also be a consideration.

(U)Y124 RNAV5 ATS route between DEXEN and MOGTA is currently classified as CDR 1, 2 & 3<sup>2</sup> with limited standard operational hours usually 1800 – 0800. This allows the MOD access to the North Wales Military Training Area (NWMTA) during the day, and to conduct activities within D201B (managed by QinetiQ). From an ATM perspective this limits the effectiveness of the route to the first rotation from Dublin and all further departures are positioned within the confines of L975, Q36 & Q37.

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<sup>1</sup> COP is a coordination point on the international boundary where control of aircraft under ATC is passed between the IAA/NATS. DEXEN is the COP on Y124.

<sup>2</sup> CDR is a Conditional Route available at times published in the Route Availability Document (RAD).



## 2.6 Policy

**DP10 CAA Requirements (B):** The Y124 design option will take cognisance of UK CAA SUA Safety Buffer Policy & Controlled Airspace Containment Policy.

### 3. Stakeholder Engagement in Developing Design Principles

A group of targeted stakeholders were sent a set of draft Design Principles on 6<sup>th</sup> August 2019 (see **Error! Reference source not found.** and Figure 3 below), with Design Principles labelled '(A)' designated as high priority and '(C)' being the lowest priority. The stakeholders are listed below. They were asked to provide comments by 30<sup>th</sup> August (see Appendix A for engagement evidence) and send them to the NATS Airspace Consultation mailbox. The deadline for comments was extended by a week to the 6<sup>th</sup> September to allow more time for stakeholders to respond. This was then followed up with a prompt email being sent to all stakeholders on the 3<sup>rd</sup> September for final comments (see Figure 4 below).

#### Stakeholders contacted:

##### Airlines

Airlines UK, British Airline Pilots Association (BALPA), British Airways (BA), easyJet, Low Fare Airlines, Virgin

##### Aviation Stakeholders

Airspace 4 All, BAE Systems, British Helicopter Association (BHA), Defence Airspace and Air Traffic Management (DAATM), Guild of Air Traffic Control Officers (GATCO), Gulf Aviation Academy (GAA), Light Aircraft Association (LAA)

##### Environmental Stakeholders

Aviation Environment Federation (AEF)

##### General Aviation Stakeholders

Aircraft Owners and Pilot Association (AOPA), Association of Remotely Piloted Aircraft Systems (ARPAS), British Business and General Aviation Association (BBGA), British Gliding Association (BGA).

There were three responses received from this engagement which can be found in Appendix B below.

- BAE Systems confirmed that they had no comments on the draft Design Principles.
- British Helicopter Association confirmed that they had no comments on the draft Design Principles.
- A response was received from the MoD with a number of comments which NATS responded to (see Figure 9 below):
  - Clarity was sought on the Design Principle priorities. NATS confirmed the order of priority (A – C).
  - The MoD suggested that there be an additional DP regarding Flexible Use of Airspace, relating to MoD and civil operations. NATS explained that inclusion of such a Design Principle would contradict the Statement of Need.
  - The MoD sought reassurance that all available options will be considered in the ACP, including any alternatives to Y124 changes. Further detail on route usage was also requested. NATS explained that the Statement of Need specifically relates to Y124 as it is a key route for Dublin traffic; and that further detail on flight usage and timings will be developed as part of Stage 3 (design options).

- The MoD sought clarification that issues around spacing and technical issues could be resolved as part of this ACP, and assurance be explored. NATS explained that any technical constraints and opportunities will be identified and reviewed in Stage 3 of the ACP process.
- The MoD also commented that at the meeting on 24/01/19 at CAA, they stated concerns over any changes to Y124 which would result in a reduction in the size and availability of the NWMTA. NATS advised that all feedback will be included in the Design Principle evidence documentation (this document).
- DP3 – the MoD suggested that DP3 (compatible interface with Dublin) should be a lower priority than DP6 (minimal MoD operational impact). NATS explained that the priority reflects the fact that the accommodation of dual runway operations at Dublin is the driver behind this ACP. However, minimal operational impact for the MoD is equally important hence the same priority.
- DP6 - the MoD sought clarification that subsequent impacts to other airspace users below 7,000ft, will be considered if they are displaced as a result of any change. NATS replied that this would be the case.
- DP7 – the MoD suggested that there will be an increase in all military flying including training, which is considered the highest priority for the RAF, and often government policy. MoD raised a concern that there will be an overall reduction in airspace for the MoD. NATS noted this and replied that this will be considered in Stage 2 of the ACP.
- DP10 – the MoD sought clarification on the intent of this DP (cognises of UK SUA safety buffer policy and CAS containment policy); highlighting that operations within D201B and routine operations within NWMTA are potentially very different. NATS responded that proposed design(s) will take into consideration full use of relevant areas of airspace, including dimensions and activities.
- DP11 – the MoD suggested that different designs may require education/training of aircrew and controllers. NATS noted this; it will form part of the design impact analysis.
- The MoD replied that they were content with the responses provided by NATS.

Table 1 below gives a summary of the ongoing engagement that has taken place between NATS and aviation stakeholder groups.

Date	Meeting	Attended by
04/12/2018	NATS – MOD NWMTA/Y124 Meeting	NATS, MoD, QinetiQ
24/01/2019	Meeting at CAA House	CAA, MoD, NATS
27/06/2019	Meeting at NATS Prestwick	IAA, NATS
07/08/2019	Email Engagement Response	Email from British Helicopter Association
28/08/2019	Email Engagement Response	Email from MoD
09/09/2019	Email Engagement Response	Email from BAE Systems

**Table 1: Summary of Stakeholder Engagement Activity**

During this series of engagement, Design Principles have been discussed and this dialogue has influenced the Design Principles stated in section 2. Design Principles were first presented to the IAA on the 27<sup>th</sup> June 2019, for which there was no objections. Significant feedback was received from the MoD regarding Y124 route changes, however there was general agreement to the Design Principles, hence no “differing views” which needed to be reconciled (ref. CAP1616 para 114).

## 4. References

1. CAA Policy Statement: [SPECIAL USE AIRSPACE - SAFETY BUFFER POLICY FOR AIRSPACE DESIGN PURPOSES](#) (22 August 2014)
2. CAA Policy Statement: [CONTROLLED AIRSPACE CONTAINMENT POLICY](#) (17 Jan 2014)

## 5. Appendix A: Stakeholder Engagement Evidence



Figure 2: Stakeholder Engagement Email Evidence

**Y124 ATS route Amendment**

**DP0 Safety**

**(A)**

Maintain or enhance current levels of safety.

**DP1 Operational (Resilience)**

**(B)**

The proposed Y124 airspace design will maintain or enhance operational resilience of the ATC network.

**DP2 Operational (Capacity)**

**(B)**

The proposed Y124 airspace design will enhance benefits from additional systemisation.

**DP3 Operational (Dublin Rwy 2)**

**(B)**

The proposed Y124 airspace design will provide a compatible interface with the Dublin 2<sup>nd</sup> parallel runway project.

**DP4 Economic (Network Performance)**

**(B)**

The proposed Y124 airspace will facilitate optimised network economic performance. (Flight plannable H24)

**DP5 Environmental (CO2 Emissions)**

**(B)**

The proposed Y124 airspace will facilitate the reduction of CO2 emissions per flight

**DP6 Environmental (Impact to Stakeholders on the Ground)**

**(C)**

Minimise environmental impacts to stakeholders on the ground (all changes are above 7000ft)

**DP7 Technical (MoD Requirements)**

**(B)**

The Y124 airspace will be compatible with the requirements of the MoD/Qinetiq

**DP8 Technical (Minimise CAS)**

**(B)**

The volume of controlled airspace required for the Y124 should be the minimum necessary to deliver an efficient airspace design, taking into account the en route connectivity required for Dublin ANSP operation

**DP9 Technical (Use of PBN)**

**(B)**

The Y124 airspace will enhance the use of PBN (RNAV 1 proposed)

**DP10 Policy (CAA Requirements)**

**(B)**

The Y124 design option will take cognisance of UK CAA SUA Safety Buffer Policy & Controlled Airspace Containment Policy

**DP11 Operational (Training)**

**(B)**

The Y124 design minimises the operational impact to airspace users (ATC/ Airlines – minimal training)

Figure 3: Y124 Design Principles sent to stakeholders



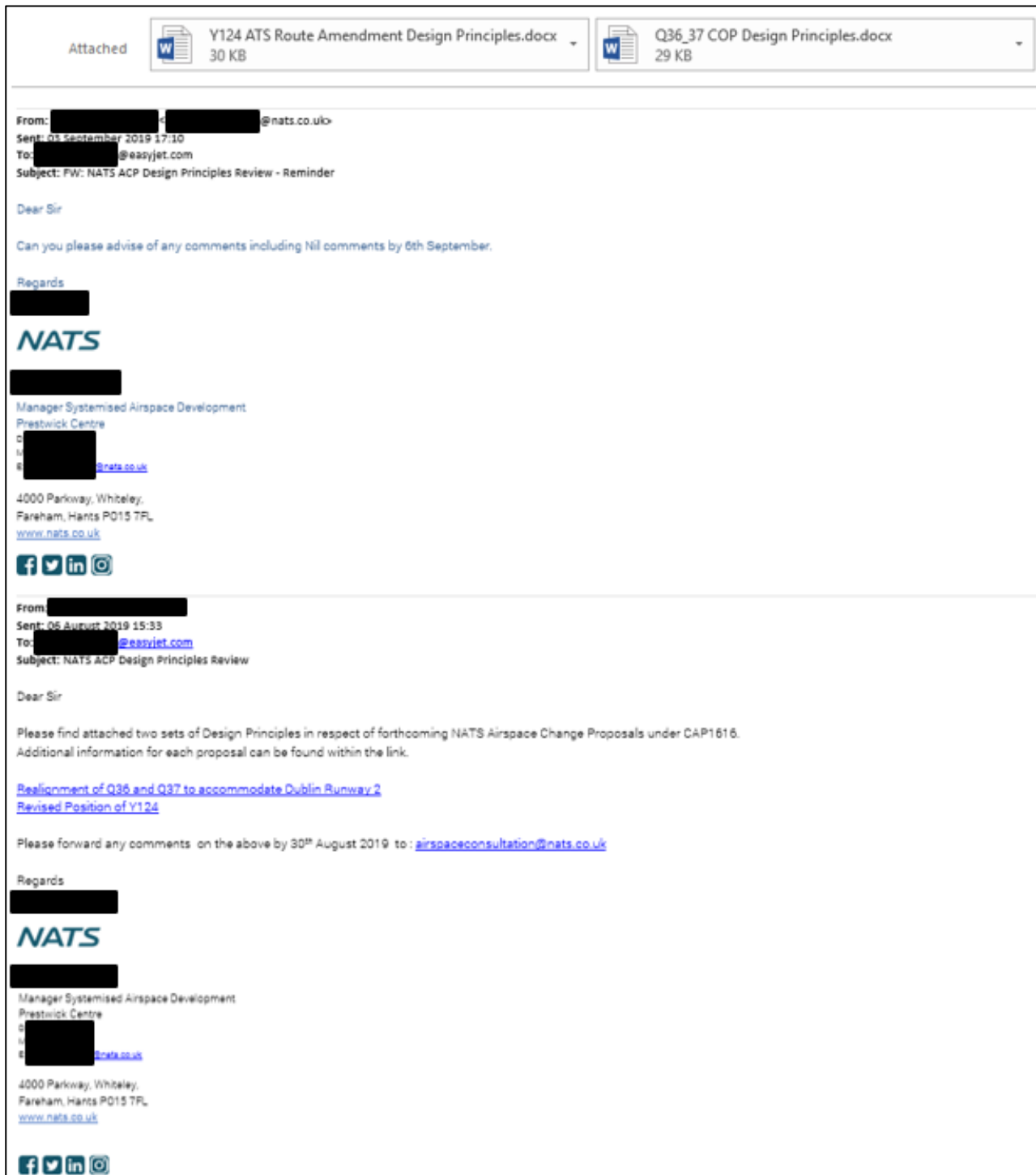


Figure 4: Design Principles email reminder sent to stakeholders

**From:** [REDACTED] (UK) <[REDACTED]@baesystems.com>  
**Sent:** 09 September 2019 11:45  
**To:** [REDACTED] <[REDACTED]@nats.co.uk>  
**Subject:** RE: NATS ACP Design Principles Review

Hi [REDACTED]

Apologies for the late response. Nil comments on the principles.

Thanks,  
[REDACTED]

[REDACTED]  
Manager of Air Traffic Services  
BAE Systems – Air

Figure 5: BAE Systems Response

**From:** [REDACTED]@britishhelicopterassociation.org>  
**Sent:** 07 August 2019 12:17  
**To:** [REDACTED] <[REDACTED]@nats.co.uk>  
**Subject:** RE: NATS ACP Design Principles Review

[REDACTED]


Thank you for the sight of this work – The BHA has no comments

Thanks

[REDACTED]

[REDACTED]  
Chief Executive  
British Helicopter Association  
Graham Suite  
Fairoaks Airport  
Chobham  
Surrey. GU24 8HU

Office: [REDACTED]  
Mobile [REDACTED]  
[www.britishhelicopterassociation.org](http://www.britishhelicopterassociation.org)

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formerly known as  
 **helitech**  
international  
HELICOPTER EXPO & CONFERENCE

Figure 6: British Helicopter Association Response



Ministry  
of Defence

Defence Airspace & Air Traffic Management  
CAA Aviation House, 1E  
Gatwick Airport South  
West Sussex  
RH6 0YR

Telephone: [REDACTED]

Email: [REDACTED]@mod.gov.uk

[REDACTED]  
Manager Systemised Airspace Development  
4000 Parkway, Whiteley  
Fareham  
Hants  
PO15 7FL

28 Aug 19

Dear [REDACTED]

#### MINISTRY OF DEFENCE (MOD) RESPONSE TO NATS ACPs: Y124 AND Q36/Q37

1. Thank you for your recent correspondence regarding the design principles for ACPs: Realignment of Q36 and Q37 to accommodate Dublin Runway 2 and the revised position of Y124. Specific comments related to each of the design principles for both ACPs can be found at Annex A and Annex B respectively.

2. Given the information provided, it is unclear the priority that each design principle will be given. It is assumed that group A is top priority, followed by those in Group B and the Group C. It would be beneficial to have clarification on how the DPs will be prioritised.

The following comments relate specifically to the Y124 ACP:

3. The MOD would wish consideration of an additional DP to be added regarding Flexible Use of Airspace. MOD believe this should be considered due to the time-bound nature of MOD operations as well as the peaks in flow rate for civil operations.

4. The MOD would like to highlight the following comment from the Y124 ACP assessment meeting minutes, Item 7: *"Engagement with the MoD has already started and has received positive feedback."* The MOD wishes to clarify that a meeting took place on 24 Jan 19 at CAA House, London where MOD stated there were concerns over any changes to Y124 which would result in a reduction in the size and availability of the NWMTA.

5. The MOD seeks reassurance that this ACP will consider all available options to resolve the issue. Is a change to Y124 the only solution to what NATS are trying to achieve? The MOD would be grateful for more information to aid understanding of the issue e.g. the expected increase in numbers of flights, expected flow rates, routings and timings and how these will impact requirements.

6. With respect to one of the issues highlighted as part of the Y124 ACP, *"Minimum spacing between Q36 and 'revised Y124' could be 5.8nm. However, due to current Swanwick MOPS constraint (IFACTS based) 7nm spacing will be required."* The MOD seeks clarification whether resolving this equipment constraint and its potential impact to operations and airspace design, is

being considered within this ACP. MOD seeks reassurance from NATS that all avenues will be explored and considered in order to ensure an optimal airspace design for all parties concerned.

7. The MOD welcomes continued engagement on both ACPs. If you require any further information, please do not hesitate to contact the undersigned.

Yours faithfully,

*[signed electronically]*


  
Squadron Leader  
SO2 Airspace Plans

Figure 7: MoD Response Header

## MOD RESPONSE TO DESIGN PRINCIPLES FOR Y124 ATS ROUTE AMENDMENT ACP

The design principles provided by NATS are black text, with MOD comments provided in red text.

**DP0 Safety (A)**  
Maintain or enhance current levels of safety. **Agree.**

**DP1 Operational (Resilience) (B)**  
The proposed Y124 airspace design will maintain or enhance operational resilience of the ATC network. **MOD has no comment.**

**DP2 Operational (Capacity) (B)**  
The proposed Y124 airspace design will enhance benefits from additional systemisation. **MOD has no comment.**

**DP3 Operational (Dublin Rwy 2) (B)**  
The proposed Y124 airspace design will provide a compatible interface with the Dublin 2<sup>nd</sup> parallel runway project. **MOD believe this should be a lower priority than DP6.**

**DP4 Economic (Network Performance) (B)**  
The proposed Y124 airspace will facilitate optimised network economic performance. (Flight plannable H24) **MOD has no comment.**

**DP5 Environmental (CO2 Emissions) (B)**  
The proposed Y124 airspace will facilitate the reduction of CO2 emissions per flight. **MOD has no comment.**

**DP6 Environmental (Impact to Stakeholders on the Ground) (C)**  
Minimise environmental impacts to stakeholders on the ground (all changes are above 7000ft) **MOD seeks clarification on whether there will be consideration of any subsequent impacts to other airspace users below 7000ft, if they are displaced as a result of any change.**

**DP7 Technical (MoD Requirements) (B)**  
The Y124 airspace will be compatible with the requirements of the MoD/Qinetiq  
**The MOD are engaged with NATS through the FSP and future airspace requirements. There will be a continued increase in all aspects of military flying, including for Basic and Advanced Fast Jet Training at RAF Valley, which is currently the Air Force Board's highest priority for the RAF. Qinetiq requirements are often as a direct result of government policy, which should be considered. The MOD is concerned about the overall impact of change which will see an overall reduction of available airspace available for defence. It should be noted that MOD/Qinetiq operations require airspace of specific dimensions to meet specific operational requirements.**

**DP8 Technical (Minimise CAS) (B)**  
The volume of controlled airspace required for the Y124 should be the minimum necessary to deliver an efficient airspace design, taking into account the en route connectivity required for Dublin ANSP operation **Agree; all options for airspace classification should be considered. See comments re DP11**

**DP9 Technical (Use of PBN) (B)**  
The Y124 airspace will enhance the use of PBN (RNAV 1 proposed) **No comment**

**DP10 Policy (CAA Requirements) (B)**  
 The Y124 design option will take cognisance of UK CAA SUA Safety Buffer Policy & Controlled Airspace Containment Policy. The MOD seeks clarification on the intent of this DP. It should be noted that operations within D201B and routine operations within the NWMTA are potentially very different.

**DP11 Operational (Training) (B)**  
 The Y124 design minimises the operational impact to airspace users (ATC/ Airlines – minimal training). All airspace designs should be considered for an optimal solution. There should be an acknowledgement from NATS that this may require education and training of aircrew and controllers, if necessary, to provide the most optimal solution for all parties concerned.

The MOD would wish consideration of an additional DP to be added regarding Flexible Use of Airspace. MOD believe this should be considered due to the time-bound nature of MOD Operations as well as the peaks in flow rate for civil operations.

Figure 8: MoD Response

[Redacted]

**From:** [Redacted] (DAATM-Airspace SO1) [Redacted]  
**Sent:** 25 September 2019 10:31  
**To:** Airspace Consultation  
**Cc:** [Redacted]  
**Subject:** RE: NATS Response to MoD Feedback to Q36/ Q37 ACP

[Redacted]

Thank you for the response. [Redacted] The stated DP was 'The proposed route amendments will have minimal MoD operational impact', however in your email below highlighted in yellow you used the expression minimising MOD impact. These are 2 different things. An impact can be minimised but still have significant impact whereas as minimal is exactly that – slightly more than no impact and certainly, in my view, nothing that inhibits MOD output.

So, if the DP remains as 'minimal operational impact' which allows the MOD to make the judgment as to whether it is minimal or not, then I am content for the DP as stands. However, if your intent is to minimise then we would need further discussion.

Hope this clarifies the situation.

Give me a call if still not clear.

Regards

[Redacted]

[Redacted] Defence Airspace and Air Traffic Management | [Redacted]

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**From:** Airspace Consultation [Redacted]  
**Sent:** 20 September 2019 15:38  
**To:** [Redacted] (DAATM-Airspace SO1) [Redacted]  
**Subject:** RE: NATS Response to MoD Feedback to Q36/ Q37 ACP

Dear [Redacted]

I've had time to speak to my colleagues about the points you've raised below, please find a consolidated response.

Firstly, I wanted to check whether your comments were in relation to the Y124 ACP, rather than Q36/ Q37? You had previously responded that you supported DP6 in the Q36/ Q37 ACP (minimal MoD operational impacts).

Our Design Principles should be overarching criteria which our design should seek to achieve; therefore we do not want to commit to something that could greatly impact upon our design flexibility. [Redacted]

[Redacted]

We feel that we have justified why DP3 (compatible interface with Dublin) and DP6 (minimal MoD operational impact) have the same level of priority, with DP3 being the driver of this ACP.

The points you have raised are valid and we can absolutely commit to working alongside the MoD towards a workable solution. As a key stakeholder, we will continue to engage with you throughout the Stage 2 Design phase of work, where we will seek feedback on specific designs prior to consultation. However as mentioned above, the Design Principles should not dictate the design, which includes completely eliminating any potential impacts of the design. CAP1616 has a large focus on impacts, as airspace change is rightly assumed to create impacts: both negative and positive.

NATS will therefore continue to submit the Design Principles using the same wording and priorities as originally stated.

We appreciate that you will likely still have concerns about the Design Principles (and wider ACP), and would like to offer a call early next week to discuss this further. I can ensure that relevant parties are present from NATS.

Kind regards,

[Redacted]



Airspace Change Specialist

[Redacted]  
 4000 Parkway, Whiteley,  
 Fareham, Hants PO15 7FL  
[www.nats.co.uk](http://www.nats.co.uk)  
**NATS PRIVATE**

**From:** [Redacted] (DAATM-Airspace SO1)  
**Sent:** 19 September 2019 17:26  
**To:** Airspace Consultation  
**Subject:** FW: NATS Response to MoD Feedback to Q36/ Q37 ACP

Thank you for the response to [Redacted]. I fear this still needs a little more discussion.

Wording here is important. Minimising something is not equally balanced with achieving something which is what your current design principles do. Achieving your aim and minimising impact upon the MOD, which might be unacceptable to the MOD, is not an equitable approach. It implies you are going to do it whatever.

Could I suggest, a compatible interface with Dublin and no impact on the MOD as the same priority. Or a compatible interface with Dublin and no unacceptable impact on the MOD, as the same priority.

I realise that a lot of the important detail and discussions occur during stage 2 and that there may not be any conflict, however, I would be grateful if you would consider either changing the priority or wording for DP6 to that suggested above.

or I would be happy to discuss further,

King Regards

[Redacted]

[Redacted] | Defence Airspace and Air Traffic Management | [Redacted]

**From:** Airspace Consultation  
**Sent:** 19 September 2019 15:48  
**To:** [Redacted] (DAATM-AirspacePlansSO2)  
**Cc:** [Redacted]  
**Subject:** NATS Response to MoD Feedback to Q36/ Q37 ACP

Dear [Redacted]

Thank you for your letter and feedback relating to the draft Design Principles for the NATS Realignment of Q36 and Q37 ACP.

In the absence of my line manager [Redacted], please find responses to your queries below.

We are planning to submit the Stage 1B documentation on Friday 11<sup>th</sup> October, which targets the CAA's October Gateway Assessment meeting on the 25<sup>th</sup>. If you have further questions relating to the below responses or our submission, please do not hesitate to get in contact with myself or my colleagues.

Kind regards,

[Redacted]

#### General Queries

*(Q2 in email) It is unclear the priority that each DP will be given. It is assumed that group A is top priority, followed by those in Group B and Group C.*  
 We can confirm that A is the highest priority DP, following by B and C.

#### Q36/ Q37 Route and COP Changes

*(Annex A in email) DP3/ DP6 - MoD believe that DP3 (compatible interface with Dublin) should be a lower priority than DP6 (minimal MoD operational impact)*  
 The proposed routes are designed to accommodate dual runway operations at Dublin which is the driver behind this ACP. Therefore NATS feels that the priority (B) for a compatible interface with Dublin adequately represents this. DP6, minimising MoD impact, has been given the same priority to demonstrate the importance of this.



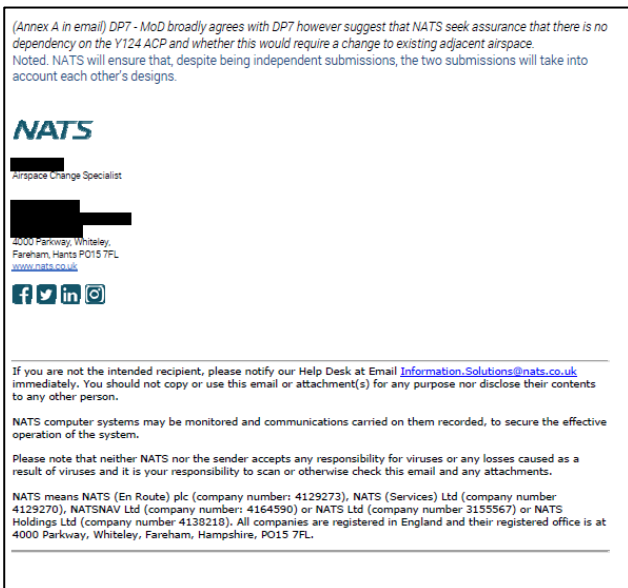


Figure 9: NATS Response to MoD