

Swanwick Airspace Improvement Programme  
Airspace Development 3  
LAC S21/ Jersey/ Brest Interface

SAIP AD3  
Gateway documentation:  
Stage 3 Consult

Steps 3A and 3B Consultation Strategy

***NATS***

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## Publication history

Issue	Month/Year	Change Requests in this issue
Issue 1	April 2018	Published

## References

Ref No	Description	Hyperlinks
1	SAIP AD3 CAA web page – progress through CAP1616	<a href="#">Link</a>
2	Stage 1 Assessment Meeting Presentation	<a href="#">Link</a>
3	Stage 1 Assessment Meeting Minutes	<a href="#">Link</a>
4	Stage 1 Design Principles	<a href="#">Link</a>
5	Stage 2 Design Options	<a href="#">Link</a>
6	Stage 2 Design Principle Evaluation	<a href="#">Link</a>
7	Stage 2 Initial Options Safety Appraisal	<a href="#">Link</a>

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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 Consult Gateway, Steps 3A and 3B Consultation Strategy
- 1.3 Previous documents <sup>(Refs 5, 6, 7)</sup> have reduced the number of design concepts to one, known as Option 2. This uses existing airspace structures and is the preferred concept option. The “do nothing” option has been discounted as it did not fully meet any of the 11 design principles, including categorically not meeting the highest priority principle of achieving ANSP agreement <sup>(Ref 6)</sup>. There is still scope for feedback on the specific details of the concept option upon which we are consulting – the removal of other concepts.
- 1.4 NATS is proposing a partial re-alignment of some Air Traffic Service (ATS) routes within existing Controlled Airspace (CAS) in the London Flight Information Region (FIR) over the English Channel.

## 2. Engagement Activities Completed To Date

- 2.1 The NATS engagement activities have been carried out in accordance with the plan described in the Stage 1 Assessment Meeting Minutes <sup>(Ref 3, Section 7)</sup>.
- 2.2 Analytics completed an environmental benefits assessment for all 3 options: baseline, Option 1 and Option 2. Options 1 and 2 both showed an overall fuel dis-benefit; however the changing balance of traffic flows would cause a qualitative benefit by reducing complexity as a by-product of the proposed route realignment.
- 2.3 The most recent engagement activities were all based on the Option 2 concept. The engagement activities are listed in Section 5 of the Design Principles document <sup>(Ref 4)</sup>.
- 2.4 NATS has met with, and briefed, the airlines AUR, BCI and BEE<sup>1</sup> on the planned changes. These meetings were preceded by, and followed up with, email exchanges.
- 2.5 The NATS Operational Partnership Agreement (most recent OPA meeting 20<sup>th</sup> March 2018) and Flight Efficiency Partnership (most recent FEP meeting 21<sup>st</sup> March 2018) are two forums where this proposed change was discussed.
- 2.6 During these forums, the airlines BAW, RYR and EZY<sup>1</sup> requested more information. NATS engaged with these airlines via email and they are also stakeholders in this consultation.
- 2.7 The operators SSZ and SWN<sup>1</sup> are not covered by OPA or FEP; however we engaged them because we identified their operation as highly Channel Islands-oriented.
- 2.8 The MoD was engaged via Defence Airspace and Air Traffic Management (DAATM) on a previous iteration of the design and indicated it has no objection.
- 2.9 Typically, the operators covered by the National Air Traffic Management Committee (NATMAC) forum would be engaged, however there would be duplication with the main stakeholders, and the smaller operators are not generally covered by the NATMAC forum.

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<sup>1</sup> See Section 0

Annex A – List of Stakeholders for airline stakeholder details.

- 2.10 This shows that appropriate engagement has occurred via appropriate mechanisms, and the most relevant operators are fully aware of the consultation constraints (in particular the reduced consultation period, see paragraphs 3.16-3.17 for details).
- 2.11 The engagement feedback we received has been considered in the drafting of the Stage 3 documentation.

### 3. Consultation Strategy: Audience, Approach, Materials and Length

- 3.1 This is an en-route network proposal over the sea above 7,000ft within existing controlled airspace. It is a Level 2A airspace change.
- 3.2 A standard environmental analysis focussing on the fuel/ CO<sub>2</sub> impacts has been completed. No analysis relating to noise or local air quality has been completed because the change would occur over the English Channel at high level.
- 3.3 NATS does not plan to target organisations whose primary interest is environmental (e.g. noise, local air quality). There would be no change in impact to these organisations, which are not currently affected.
- 3.4 NATS does not plan to target airspace users classed as General Aviation (GA), such as parachuting, ballooning/airships, helicopter operations and Unmanned Air Vehicles (UAV)/ model aircraft flying. There would be no change in impact. Although they will not be specifically targeted, all airspace users are welcome respond to this consultation.
- 3.5 NATS does not plan to target airport operators. There would be no change in impact. Although they will not be specifically targeted, all airport operators are welcome respond to this consultation.
- 3.6 The Ports of Jersey (PoJ) and DSNA (France Brest) ANSPs are collaborative sponsors and partners within this airspace change proposal. They will be asked to provide feedback to the consultation.
- 3.7 The reason AUR, BCI and BEE<sup>2</sup> were our primary target is that, combined, their flights account for 80% of all Solent Airport-Channel Islands flights – those most likely to be impacted by the proposed changes.
- 3.8 We will primarily target these three major operators and actively seek their in-depth responses. They will each be provided with the standard environmental analysis and separately, an individual estimate of the predicted fuel change per flight. This estimate will be commercially confidential per operator, not for publication as part of the consultation.
- 3.9 BAW, RYR and EZY<sup>2</sup> were engaged on their request because they regularly use the airspace in the region. They do not fly into or out of the Channel Islands as often as the primary targets, hence they are not targeted in the same way. They will each be provided with the standard environmental analysis.
- 3.10 SSZ and SWN<sup>2</sup> were also engaged because their operations are very focussed on the Channel Islands, but their operation is comparatively much smaller than the primary targets, hence they are not targeted in the same way. They will each be provided with the standard environmental analysis.
- 3.11 These other five stakeholders will be included in the consultation and encouraged to respond, as they are the next-most-relevant when compared with the primary targets. They will be provided with the standard environmental analysis as part of the consultation material.
- 3.12 The MoD is a mandatory stakeholder in all airspace changes, and will be consulted via DAATM as per standard airspace consultations.

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<sup>2</sup> See Section 0

Annex A – List of Stakeholders for airline stakeholder details.

- 3.13 We will put a link to the consultation on the NATS Customer Affairs website, one of the information transfer mechanisms between NATS and our customer airlines.  
We will also put a link on the NATS.aero website, which is available to the public.
- 3.14 Our stakeholders are considered to be an aviation expert audience; therefore we plan to use aviation technical language in the consultation material, in English only. We plan to conduct the consultation entirely via the internet (including email and the online consultation portal).
- 3.15 The timeline for this proposed airspace change is fixed by a target implementation date for new SIDs and STARs serving Jersey and Guernsey Airports on the 6<sup>th</sup> December 2018.
- 3.16 Typically, an airspace change consultation would have a 12-week duration. That period would push the timeline for implementation beyond the agreed target implementation date for the new SIDs and STARs serving the Channel Islands. This is accounting for the fixed periods of CAA decision-making and Aeronautical Information Service (AIS) data lead time for a single Aeronautical Information Regulation and Control (AIRAC) cycle.
- 3.17 The duration of this targeted consultation will be four weeks – there is insufficient time to allow for a longer consultation due to the operational constraint of PoJ's simultaneous change. NATS intends to commence consultation on **Wednesday 2<sup>nd</sup> May 2018** and subsequently close it on **Wednesday 30<sup>th</sup> May 2018**. NATS is confident that four weeks is sufficient time for stakeholders to respond; who are already well informed about the proposed changes from significant stakeholder engagement activities.
- 3.18 Stakeholders will be emailed to inform them when the consultation is launched. They will be able to view and download the consultation document on the online consultation portal, alongside access links to all supporting documentation. This is where they can also submit a response to the consultation.
- 3.19 The mid-point of the consultation will be two weeks after the email launch. At this time we will consider the responses received so far and will actively request a progress update from those remaining primary targeted stakeholders, taking into account the constraints detailed in this section.
- 3.20 Responses will be managed and uploaded to the portal by the CAA. If responses contain any commercially sensitive data (such as typical aircraft weights / load factors etc.) then NATS expects CAA to redact that sensitive information, as part of its moderating practice.
- 3.21 NATS will acknowledge receiving responses by sending a completion message back to the user, using the email address they provide. We will also include a list of FAQs on the consultation portal if responses require clarification.
- 3.22 In the event of unexpected challenges or events, we will directly communicate and negotiate with stakeholders in order to resolve an issue and reach a mutual agreement. However we have already stated that there is no scope for lengthening the consultation if this is challenged.
- 3.23 At the end of the four week deadline the responses will be analysed and themed; any late responses may not be included in the subsequent analysis.
- 3.24 The consultation feedback document will summarise the themes and NATS' response to issues raised – this may involve making changes to the design. The feedback document will be available for download via the CAA portal, and the ACP will be written based on the final design described in the feedback report.

## 4. Reversion Statement

- 4.1 NATS considers this consultation to be the 'do minimum' option because 'do nothing' is not a feasible, realistic option.
- 4.2 Should the proposal be approved and implemented, it would be extremely difficult to revert to the pre-implementation state. This is due to the simultaneous implementation of new SIDs and STARs serving the Channel Islands. This will permanently change the Channel Island Control Zone (CICZ) airspace structure with which NATS shares an FIR boundary. This will be noted in the consultation material.
- 4.3 There would be notable consequences for UK connectivity and its interface with the Channel Islands if this work is not complete by that date. The current airspace does not support the revised airspace changes due to the built-in complexities and confusions which arise from the operation being highly tactical. If the UK and Channel Islands changes are not implemented coincidentally there could be significant issues filing acceptable flight plans which could potentially incur additional costs and delays for airlines.

## 5. Conclusion and Next Steps

- 5.1 The proposed concept for the airspace design is Option 2. Full descriptions of other options <sup>(Ref 5)</sup> and the details of how Option 2 was decided upon as the preferred option <sup>(Ref 6)</sup> can be found in the airspace change documentation published on the CAA website <sup>(Ref 1)</sup>. Work has been ongoing on the specific route details of the Option 2 concept, and the CO<sub>2</sub> analytics data uses the latest iteration. This analysis will provide the required information for the Full Options Appraisal.
- 5.2 We consider this consultation strategy to be reasonable and proportionate. We are consulting on changes which have been influenced by stakeholder engagement and design decisions; before being fully evaluated and appraised. Our engagement activities have also allowed us to scale the consultation accordingly, whilst still allowing sufficient time for consideration and response. Our stakeholders have been given advance notice about the consultation strategy.
- 5.3 This proposal has completed the CAA's Stage 3 Gateway Assessment for consultation. The consultation material is being finalised, and we will set up the appropriate online consultation portal and launch the consultation via email.

## 6. Annex A – List of Stakeholders

Links to the consultation will be placed on the NATS Customer Website and also on the NATS public website. The consultation is most relevant to the stakeholders listed below, but is not exclusive to this list. Any individual or organisation may submit a response; however we are only targeting the organisations discussed in this document.

### **Mandatory Stakeholder:**

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

### **Primary Target Stakeholders:**

These three air operators will be engaged during the consultation and their response actively sought

AUR Aurigny Air Services

BCI Blue Islands

BEE Flybe

### **Additional Stakeholders:**

These five air operators will be informed of the consultation and encouraged to respond

BAW British Airways

EZY easyJet

RYR Ryanair

SSZ Specsavers Aviation

SWN West Atlantic Cargo

End of document