

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

SAIP AD3
Gateway documentation:
Stage 3 Consult

Step 3D Collate and Review Responses

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, stylized blue swoosh that curves from the top left towards the bottom right.

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Action	Position	Name	Acknowledged	Date
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Issue	Month/Year	Change Requests in this issue
Issue 1.0	June 2018	Submitted to CAA for publication

References

Ref No	Description	Hyperlinks
1	SAIP AD3 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 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 Categorisation of responses

2. Consultation

- 2.1 NATS has completed a focussed consultation on a proposed airspace change in the London FIR. This would partially re-align some ATS routes using existing airspace structures over the English Channel.
- 2.2 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 6th December 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) has been 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 eight airlines and the MoD were specifically engaged and targeted for this consultation. These are listed in 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 The eight airlines and the MoD 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.
- 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 feedback through.
- 2.8 A list of the questions used in the online portal can be found in Annex B – Online Portal Questions.
- 2.9 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 NATS.aero website which is available to the public.
- 2.10 The consultation commenced on Wednesday 2nd May 2018 and ended on Wednesday 30th May 2018; a period of four weeks.
- 2.11 Responses have been managed and uploaded to the portal by the CAA.
- 2.12 There were no responses which required any additional material, such as an FAQ section, received throughout the consultation.
- 2.13 A follow-up email was sent out to all of the targeted airlines and the MoD on Wednesday 9th May in order to check that stakeholders had received the original consultation invitation, prompting them to check junk email folders.

- 2.14 On Friday 25th May 2018 a final email was sent to all of the targeted stakeholders who had not yet responded. This reminded stakeholders that the consultation was closing five days later and included a link to the online consultation portal.

3. Summary of Consultation Responses

- 3.1 A total of seven responses were received in the four week consultation period.
- 3.2 At the end of the four week deadline, the responses have been analysed and themed. The categorisation of responses has been split into those which may impact final proposals and those which do not. This is covered in Section 4 below.
- 3.3 Responses were received from all three primary stakeholders: Aurigny, Blue Islands and Flybe.
- 3.4 Two of the five additional airline operators responded: easyJet and Flybe. There were no responses received from British Airways, Ryanair and Specsavers Aviation. These airline operators were all prompted twice during the consultation, as described in Section 2 above.
- 3.5 The final two responses were from the MoD, a mandatory stakeholder, and the Ports of Jersey who have worked alongside NATS on this proposal.
- 3.6 Five out of the seven responses fully supported the proposed changes (71.4%); one was ambivalent, implying mixed feelings (14.3%); and the final response had no comment, neither supporting nor objecting the proposed changes (14.3%). These have been summarised below in Table 1 below, alongside the organisation behind each response.

Response ID	Organisation	Position Title	Do you support the airspace changes in this proposal?
AD3_1	Aurigny	Flight Operations Director	SUPPORT
AD3_2	Flybe	Flight Planning Manager	AMBIVALENT
AD3_3	Blue Islands	Flight Operations Director	SUPPORT
AD3_4	West Atlantic Ltd	Flight Safety Officer	SUPPORT
AD3_5	Ports of Jersey	Air Traffic Control Manager	SUPPORT
AD3_6	Ministry of Defence	Airspace Operations, DAATM	NO COMMENT
AD3_7	easyJet	Flight Planning Manager	SUPPORT

Table 1: Responses Overview

- 3.7 The online portal included focussed questions on whether the respondent supported specific elements of the proposed changes. The categories covered were: the use of RNAV1; the segregation and distribution of traffic flows; realignment of Y110; realignment of Z171; and lowered level restrictions. A graphical summary of the responses to these questions can be seen in Figure 1 below.

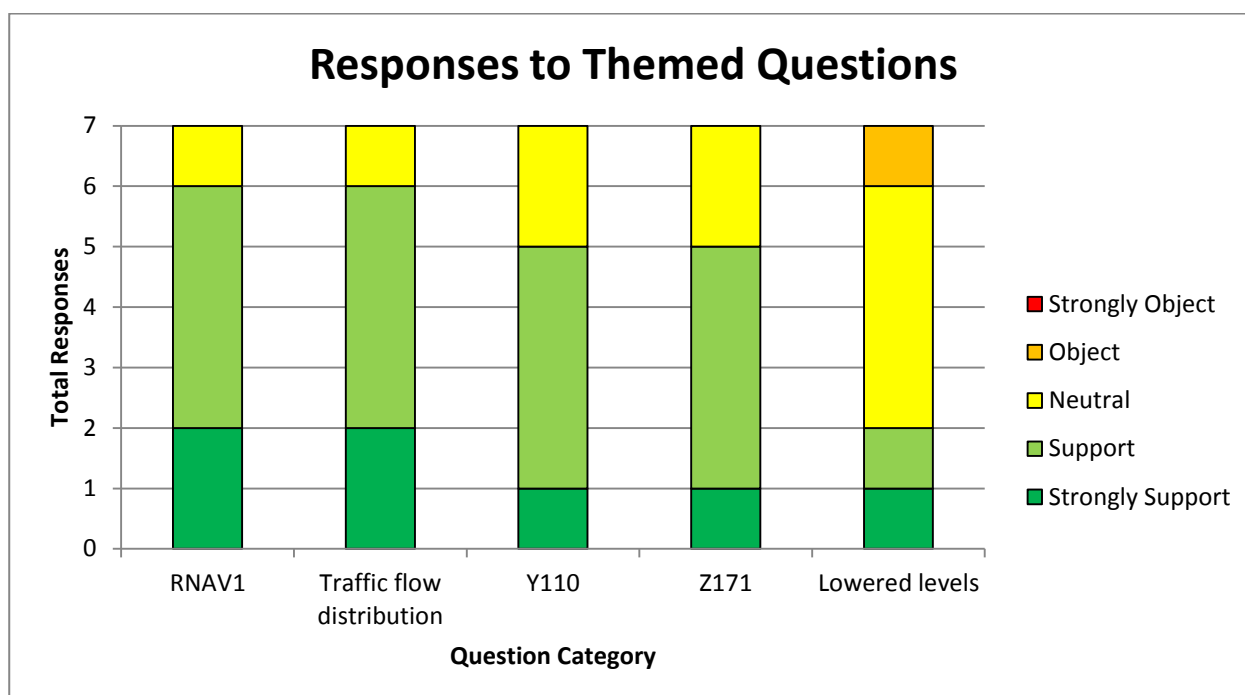


Figure 1: Consultation responses to themed questions

- 3.8 As seen above, the majority of respondents showed support for the specific elements of the proposal with 69% of all responses either strongly supporting or supporting. There were 10 neutral responses received (29%) and one which objected to the lowered levels (3%). This is covered in more detail in Section 4 below.
- 3.9 There were no additional comments received against any of the five focussed questions in the questionnaire; Questions 13 – 18 (Annex B – Online Portal Questions).
- 3.10 The response from the MoD was the only one to include an attachment, which all respondents had to opportunity to include. This attachment was a formal letter from the MoD which states that they have no objection to the proposed design and wish for any further amendments to be discussed with them. A copy of this letter can be seen in Annex C – MoD Response. The categorisation and response from NATS to this is covered in Section 4.7 below.
- 3.11 Four of the seven responses included a RNAV1 fleet equipage estimate: three responded with 100% equipage and one with 90%. Therefore the impact of mandating an RNAV1 route is minimal.

4. Categorisation of Consultation Responses and Themes

- 4.1 The seven responses received have been reviewed and categorised; some comments were made up of several different elements. The responses have all been themed based on the focussed questions covering the use of RNAV1, traffic flows, Y110, Z171 and lowered level restrictions. Where responses objected an individual element, this has been noted against the theme.
- 4.2 The responses and associated elements have been broken down into two types: those which do lead to changes of the proposal and those which do not. These have been split out in Sections 4.6 and 4.7 below.
- 4.3 There was one response which was identified as having a potential impact on the final proposed design. This has been detailed in Section 4.6 below including the acknowledgment response/ change from NATS. There were no responses which had the potential of impacting the final design but will not be acted upon by NATS.

- 4.4 The remaining six responses were all captured as not having an impact on the final proposed design. These responses, alongside a rationale behind why “no impact” upon the design has been captured, have been summarised in Section 4.7 below. This section also includes any relevant feedback or considerations gleaned from the feedback; however which still fall outside the scope of the proposed design.
- 4.5 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”.

4.6 Responses which may impact the final proposal

There was only one response, received from Blue Islands, which has been categorised as having the potential to impact on the proposed design option. This has been summarised in Table 2 below.

Response ID	Comment	Themes	Potential impact on the proposal	NATS response/ action
AD3_3	<p>I do generally support these changes and understand the need; however, I am concerned about the increase in fuel burn for both environmental and commercial reasons when operating between the Channel Islands and the south coast airfields.</p> <p>If the lower level of the change was implemented at FL130 rather than FL100, that would be eliminated and would not affect the ability to maintain separation at ORTAC. I understand that there are plans to introduce further changes at a later date following the introduction of RNAV SID/STAR routes. If it is acceptable to use FL130 as the switch point that could be re-evaluated at the time RNAV SID/STAR are introduced.</p>	RNAV1, traffic flow distribution, Y110, Z171, lowered levels (object)	The suggestion made in this response is to change the proposed Flight Level cap from FL100 to FL130. The justification is to reduce the fuel burn impact; thus reducing the environmental and commercial effects for airlines.	<p>In order to respond to this request, NATS will make the following changes to the final design proposal.</p> <p>The level at which traffic switches from Z171 to Q41 will be FL105.</p> <p>The Flight Level cap Q41 will be increased and published up to FL135. Flight Levels 110, 120 and 130 on Q41 will be RAD restricted for the following traffic only:</p> <p>EGJB/ EGJJ to EGHI/ EGHH</p> <p>EGHI/ EGHH to EHJB/ EGJJ</p> <p>The RAD restrictions will be introduced in order to prevent CI (climb instruction) to traffic filing FL130 via ORTAC and immediately requesting a higher Flight Level on first contact.</p>

Table 2: Responses which may impact the final proposal

4.7 Responses which do not impact the final proposal

The following six responses have been captured as not containing any new information or suggestions that could lead to an adaptation in the final proposed design. However we have made sure that any additional relevant feedback is captured, including any actions or considerations arising from it, such as any comments on how the consultation itself has been ran.

Table 3 below summarises these responses including a rationale on why these responses do not change the final proposed design.

Response ID	Comment	Themes	Why the proposal is not impacted	Any relevant considerations/ feedback
AD3_1	I support this proposal on the basis that traffic flow should be eased, there will be less deviation from planned routes and in turn pilot and controller workload should be lessened. The environmental impacts are relatively small, with no noise effect and modest increase in CO2 output.	RNAV1, traffic flow distribution, Y110, Z171	No revisions to the proposal were submitted; the respondent expressed support for the proposed changes.	N/A
AD3_2	<p>The ATS provision and service levels for EGHI/HH are currently sufficient and without a significant increase in traffic demand, investment in changes to CAS within this area is not currently required, neither is it expected within the near to midterm. We feel traffic growth should be closely monitored and annual discussions held as the situation evolves, to identify at the earliest opportunity any requirement for changes ahead of any significant negative impact to AO's.</p> <p>The routing amendments in Option 2 are favoured by Flybe, this will enable increased routing predictability against the planned vs flown routing and give clarity to the airspace with clear North/South traffic flows and levels whilst allow connectivity to any future SID/STAR's for the EGJJ/JB.</p>	RNAV1, traffic flow distribution	A suggestion to monitor traffic growth was made however no revisions to the proposal were submitted.	<p>Flybe have requested that traffic growth is closely monitored and discussed annually, in order to determine whether the future ATS provision needs to be modified in order to reflect a change in traffic.</p> <p>The CAA will complete a full post-implementation review which will look at how the airspace change has performed over a 12-month period. This will include an assessment of the traffic levels associated with this area of airspace; as defined by the CAA.</p>
AD3_4	The proposed airspace route changes present no issue to West Atlantic Ltd. Our daily 737 operation is RNAV 1 compliant, as is the BAe ATP.	RNAV1, traffic flow distribution, Y110, Z171	No revisions to the proposal were submitted; the respondent expressed support for the proposed changes.	N/A
AD3_5	Ports of Jersey (Jersey Airport) have been fully involved in the development of this proposal with the Swanwick Airspace Team. We fully support this proposal which will also deliver many benefits to airspace users and air traffic controllers operating in the Channel Islands Airspace. This will increase both capacity and safety, along with environmental benefits	RNAV1, traffic flow distribution, Y110, Z171, lowered levels	No revisions to the proposal were submitted; the respondent expressed full support for the proposed changes.	N/A

Response ID	Comment	Themes	Why the proposal is not impacted	Any relevant considerations/ feedback
	associated with greater use of continuous climb and descent operations.			
AD3_6	The MoD has no objections, please see *attached letter.		No revisions to the proposal were submitted; the respondent expressed support for the proposed changes.	The MoD has requested that any amendments made to the proposed design are discussed with DAATM, prior to formal submission to the CAA. NATS will ensure that this is completed prior to submission.
AD3_7	We support the proposals.	RNAV1, traffic flow distribution, Y110, Z171, lowered levels	No revisions to the proposal were submitted; the respondent expressed support for the proposed changes.	N/A

Table 3: Responses which do not impact the final proposal

*The attached letter from the MoD has been included in Annex C – MoD Response.

5. Conclusion and Next Steps

- 5.1 We will update the final design proposal based on the one relevant response received.
- 5.2 This document will be published onto the SAIP AD3 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 The next step will be to publish the formal Airspace Change Proposal and submit this to the CAA. This will also 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 new SIDs and STARs serving the Channel Islands. This will permanently change the CICZ airspace structure with which NATS shares an FIR boundary. This will be noted in the consultation material.
- 6.2 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 conflictions 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.

7. 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.

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

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. Realignment of Y110
 - d. Realignment of Z171
 - e. Lowered 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 RNAV1 routes. The proposal is that the routes would improve connectivity at the southern FIR boundary. *(Optional)*
14. Comments about the proposed segregation and distribution of five traffic flows between Solent airports and the Channel Islands. *(Optional)*
15. Comments about the realignment of the Y110 ATS route. *(Optional)*
16. Comments about the realignment of the Z171 ATS route. *(Optional)*
17. Comments about the lowered 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)*

9. Annex C – MoD Response



Ministry
of Defence

Defence Airspace and Air Traffic Management
CAA House
45-59 Kingsway
London
WC2B 6TE

20180525-SAIP AD3 Consultation_MOD Response

25 May 2018

NATS

MINISTRY OF DEFENCE RESPONSE TO THE NATS SAIP AD3 CONSULTATION

Thank you for the opportunity to comment on the SAIP AD3 Consultation (Issue 1 dated May 2018). Although the MOD was not engaged during the development of the design principles we welcome the inclusion of Design Principle 6 (no MOD impact).

The MOD has no objections to the proposal but would ask that amendments to the design following consultation are discussed with DAATM prior to submission of the formal proposal to the CAA.

Squadron Leader
SO2 Airspace

End of document