

DTY DVOR STARs and Holds Documentation: Stage 4 Update and Submit

Daventry DVOR (DTY) Removal Airspace Change Proposal V1.0

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Step 4A – Update Design

No changes to the Design from Stage 3.

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2. Introduction

The intent of this document is to summarise and satisfy the requirements of CAP1616 Stage 4: update design and submit airspace change proposal to the CAA. The CAA reference is ACP-2019-56, the link to the CAA progress page is [here](#).

NATS operates 46 DVORs and NDBs around the UK which are going through the first batch of rationalisation as part of NATS' DVOR Rationalisation Programme. This is due to the DVORs operating well beyond their design life and no longer being needed due to RNAV5 (Area Navigation – 5NM) mandated Air Traffic Service (ATS) routes since 2009. This extended period of use has also created continued and unnecessary maintenance costs; as well as impacting upon airport development work prevented by safeguarding the nav aids.

Within the UK, there are several en-route Instrument Flight Procedures (IFP) which are dependent on these radio navigation aids (nav aids). As a number of them are scheduled to be removed from service, the en-route IFP definitions require updating so that they no longer refer to the nav aids scheduled to be removed.

This airspace proposal is primarily focused on en-route IFPs, in the UK AIP, which use Daventry DVOR (DTY) as a materially important nav aid. The scope of the proposal includes Standard Terminal Arrival Routes (STARs),

their associated holding patterns, and en-route procedures dependent on DTY as a conventional navaid, which reference the VOR, where NATS is the primary Air Navigation Services Provider (ANSP).

Airport-based procedures such as Standard Instrument Departures (SIDs) and Instrument Approach Procedures (IAPs) are not relevant to the en-route scope of this proposal. Airport operators are separately developing their own equivalent procedures to mitigate the removal of DTY DVOR.

As described in Section 8.2.1 below, there are several methods in which a STAR/ Hold's dependency on a navaid can be removed. As such, each STAR and Hold has been evaluated in order to determine the most appropriate method in which to remove the dependency from DTY. This method improves the overall network connectivity, reduces duplication and accounts for the current usage levels.

3. Executive Summary

In support of the DVOR Rationalisation Programme, NATS has identified all AIP enroute dependencies on, and references to, DTY DVOR. In order to remove IFP dependencies from these navaids, a list of seven design principles have been created which have been used to assess the individual IFPs against. The Design Principle (DP) with overriding priority is that the airspace change must "maintain or enhance the current level of safety" (DP0). The Design Principle (DP1) driving this change is that none of the proposed technical changes would result in a change to flight behaviours. The remaining Design Principles focused on techniques which could be used to remove the dependencies, such as IFP replication or withdrawal.

As described in the Stage 2 Gateway documentation (Ref 3), four separate design options were developed in order to remove the en-route IFP dependencies on DTY DVOR.

- Option 0 (do nothing) would retain all of the current STARs and holds unchanged from today's AIP definition.
- Option 1 would replicate each IFP with dependency on DTY DVOR by replacing existing conventional procedures using PBN procedures.
- Option 2 would evaluate the use of existing STARs and Holds from a practical point of view; re-evaluate how they are used and how the network may be improved by rationalising/ truncating/ replicating them in a considered manner.
- Option 3 would completely remove each IFP with a dependency on DTY DVOR.

The Design Principles mentioned above were used to qualitatively assess each of the four options (Ref 3). This process reduced the four options down to one, known as Option 2, which is the preferred concept option presented here. Consultation regarding DVOR rationalisation was undertaken in 2009. Due to the technical nature of the changes which will not result in changes to flight paths, no further consultation has been required.

4. Current Airspace Description

The current en-route IFPs which are dependent on DTY DVOR as an essential navaid are associated with Birmingham, East Midlands, Luton and Stansted airports. There is 1 en-route hold dependent on DTY DVOR. There are also three additional IFPs which, although not dependent on DTY, do feature on charts; these are associated with Birmingham airport. These are summarised in Table 1 below and the relevant charts can be found in the Stage 2 Gateway document (Ref 3).

Associated Airport	Current IFP	Current Routing	DTY Dependency
Birmingham	CHASE Hold	N/A - Hold	No dependency (DTY can be removed from chart) ¹
Birmingham	CHASE 1C STAR	WAL – CREWE – CHASE	Yes
Birmingham	CHASE 3A STAR	WAL – WHI – CHASE	No dependency (DTY can be removed form chart)
Birmingham	CHASE 2D STAR	AMPIT – NOKIN – CREWE – CHASE	Yes
Birmingham	OLIVE 3A STAR	BUZAD – DTY VOR – OSKOT – OLIVE	Yes
East Midlands	PIGOT Hold	N/A - Hold	Yes
East Midlands	PIGOT 1H STAR	DTY VOR – VELAG – UPDUK – PIGOT	Yes
East Midlands	PIGOT 1J STAR	WELIN – VELAG – UPDUK – PIGOT	Yes
Luton/Stansted	LOREL 1K STAR	DTY VOR – FINMA – BKY - LOREL	Yes
En route	DAVENTRY Hold	N/A – Hold	Yes

Table 1: Current IFPs mentioning DTY DVOR

4.1 Structures and Routes

The full technical notes and associated charts for each of the above current dependent IFPs, listed in Table 1, can be found in the following references:

- Birmingham IFPs – Slide 10, 11 and 12 of the Assessment Meeting slide pack (Ref 2)
- East Midlands IFPs – Slides 13 and 14 of the Assessment Meeting slide pack (Ref 2)
- Luton/Stansted IFPs – Slide 15 of the Assessment Meeting slide pack (Ref 2)
- En route IFP – Slide 16 of the Assessment Meeting slide pack (Ref 2)

4.2 Airspace usage and proposed effect

The proportions of aircraft, including fleet mix and operators, using any of the IFPs related to this project would not change as an outcome of the proposed changes. The proposed flight plan connectivity remains entirely unchanged due to RNAV replication of the STARS; therefore, the usage would remain the same as today.

There would be no change to pilot or controller behaviour, and no change to lateral or vertical traffic dispersion, nor any impact on adjacent IFPs. Therefore, the airspace capacity, usage and current operation will stay the same as today.

¹ CHASE was originally defined by the intersection of radials from HON & DTY DVORs and its Lat/Long published. Since RNAV5 was mandated in 2009, it is now published in the ENR section with its own unique Lat/Long and regarded as a RNAV waypoint in FMS Databases; if HON & DTY DVORs are simultaneously u/s it does not therefore disappear. RNAVing the CHASE Hold negates the need for its location to be defined on the Radials from the DTY (& HON) DVORs and thereby remove any reference to DTY DVOR in the UK pertaining to it.

4.3 Operational efficiency, complexity, delays and choke points

There are no specific issues relating to operational efficiency, complexity, delays or choke points associated with any of the IFPs related to this airspace change proposal.

4.4 Safety issues

There are no specific safety issues associated with any of the IFPs related to this airspace change proposal.

Ensuring the safety of the proposed changes is a priority for NATS. NATS has a dedicated safety manager for the DVOR Rationalisation Programme who ensures that the safety representatives from SARG have oversight of the safety assurance process. Section 10 contains further details on the safety assessment for this proposal.

4.5 Environmental issues

There are no specific environmental issues associated with any of the IFPs related to this project, to be solved by this airspace change proposal.

5. Statement of Need

The Statement of Need v3 (DAP1916 ref 3507) (Ref 1) submitted in October 2019 for this proposal summarises the proposed changes in support of removing the en-route dependency on DTY DVOR. This has been included in Annex Section 15.2 below.

6. Proposed Airspace Description

6.1 Objectives/ requirements for Proposed Design

The primary objective for this proposed airspace design is to remove any en-route IFP dependencies from DTY DVOR. This will be achieved by either replacing the current connectivity using RNAV5 procedures or removing the procedure altogether. The en-route flight procedures under consideration are all STARs and terminal holding patterns where DTY is material to their definition. In withdrawing the CHASE 3A STAR, the en-route dependency will also be removed from the WHI NDB.

These changes are in support of the NATS DVOR Rationalisation Programme which aims to reduce dependence on ground infrastructure without reducing en-route services.

The CAA's PBN STAR Replication Policy for Conventional STAR Replacement (Ref 6) has been used as a basis for this proposal. It defines PBN STAR Replication as a PBN redesign of an existing conventional STAR from the commencement of the STAR in the ATS en-route network to the termination point without introducing any change to existing track patterns over the ground. RNAV5 is mandated for en-route IFPs and does not require consultation under the CAA's replication policy.

This proposal has been used as an opportunity to review the relevance of the existing procedures and their details. As such, methods such as introducing truncations where an existing ATS route already formed the initial section of a STAR have been explored and considered, in line with the STAR replication policy mentioned above. Additionally the removal of some STARs will also occur and, where important Descent Planning levels relevant to the current Conventional procedure are vital, the RNAV version of these STARs will be extended back to ensure these levels are captured on the new procedures – in some cases this will require the establishment

of additional STARs to ensure all flight options and levels are captured but will not change the lateral track or vertical profile of traffic flown today.

6.2 Proposed New Airspace/ Route Definition and Usage

There is no predicted change to current connectivity or flight behaviour as a consequence of this airspace change proposal; the proposed changes are only technical changes. This means that there would be no change to pilot or controller behaviour (apart from designation changes), and no change to lateral or vertical traffic dispersion, nor any impact on adjacent IFPs. The proposed changes will also not alter route usage or traffic mix within the associated airspace.

A full summary of all the proposed changes and associated impacts can be found in Annex Sections 15.3 to 15.6 below. This details the impact assessment which was completed for all of the IFPs where DTY DVOR is material to the procedure, or they feature on the same chart. These are summarised below:

- **Birmingham:** CHASE Hold; CHASE 1C, CHASE 2D, CHASE 3A, OLIVE 3A STARs
- **East Midlands:** PIGOT Hold; PIGOT 1H, PIGOT 1J STARs
- **Luton/Stansted:** LOREL 1K STAR
- **En Route:** Daventry Hold

This document includes a full list of all IFPs: their current connectivity, the proposed connectivity and the impact of each proposed change. Charts and technical notes on all of the above individual IFPs can be found in the assessment meeting slide pack (Ref 2). The impact assessment can also be found in the Stage 2 Gateway document (Ref 3).

The proposed changes to RNAV5 replication will not change the connectivity of the procedures from today with or without appropriate extensions. Where extensions/additional STARs are being proposed, appropriate starting points for the STAR have been identified to ensure that there is no impact to connectivity. This means no change to route usage or traffic patterns over the ground. Sections 15.3–15.6 below summarise the impact assessment of all STARs and Holds which are part of this proposal.

The following ATS Routes are being revised: L10, L608, (U)M605, P166 and (U)Y250 as they either commence at, end at or route via DTY DVOR. As part of this change the DVOR element will be removed from the AIP entry for these routes however as the DME will be retained the 3LNC (DTY) will also be retained therefore there will be no impact to system adaptation. An update to the UK AIP ENR3.3 will be required to reflect this change.

The location of DTY DVOR/ DME would stay the same however, the description would be amended as DTY DME to denote the removal of the DVOR reference. The definition of DTY DVOR would be removed from UK AIP ENR 4.1 but would need to be added to the airfield sections of the AIP as the DVOR will continue to support SID procedures. This change will not introduce any changes to traffic patterns.

The relevant airspace structures, and related AIP sections, which are associated with the STAR and Hold changes, are listed in Table 2 below.

Airspace Structure	Comment	AIP Section
Aerodrome AIP changes	Individual airport charts, coding tables and text updated to reflect STAR and Hold changes	AD 2.EGGB-7-3 AD 2.EGGB-7-6 AD 2.EGNX-7-3 AD 2.EGSS-7-2 AD 2.EGGW-7-2
En-route Holding	Daventry Hold description will be removed	ENR 3.6

Radio Navigation Aids and Waypoints	DTY will be amended. MIHAK will be added	ENR 4
Area Navigation Routes	All affected RNAV routes amended by this ACP to be included in this section, alongside ATS route administrative changes	ENR 3.3
Enroute charts	Charts amended to reflect changes to ATS routes	ENR 6

Table 2: Current Relevant Airspace Structures associated with Administrative Changes

The summary of the proposed changes is that changing the procedures will not alter the traffic patterns or route usage, due to the truncation or replication of STARs.

Further technical information on the proposed designs can be found in a document summarising the draft AIP changes which lists the changes, alongside the AIP pages where these changes need to occur (Ref 4), alongside the procedure design report (PDG) document (Ref 5).

7. Impacts and Consultation

7.1 Net impacts summary for proposed route

Category	Impact	Evidence
Safety/Complexity	No impact on safety or complexity	See Section 4.4 and Section 10
Capacity/Delay	No impact on capacity/ usage or delay	See Sections 4.2 and 0
Fuel Efficiency/CO ₂	No impact, there will be no change to lateral or vertical tracks, nor to impact adjacent IFPs	See Section 7.7
Noise – Leq/ SEL	No impact, this is a Level 2C ² change	See Section 7.8
Tranquillity, visual intrusion (AONBs & National Parks)	No impact, this is a Level 2C change	See Section 7.8
Local Air Quality	No impact, this is a Level 2C change	See Section 7.8
Other Airspace Users	No impact, no changes to volume or classification of CAS	See Sections 7.4 to 7.6

7.2 Units affected by the proposal

The following airports and ACCs have been engaged throughout the project:

- East Midlands Airport
- Birmingham Airport
- Luton Airport
- Stansted Airport
- Swanwick Centre

The airports have been fully briefed on the proposed changes and the justification behind why the en-route DVOR dependencies are being removed. The proposed changes have all been designed to be invisible from an airport's perspective, asides from the AIP changes described below.

The proposed changes will alter nomenclature in the aerodrome AIP pages for the above airports. There will also be a few minor technical amendments such as STAR rationalisations. Asides from these technical changes, there are no other impacts anticipated for airports or relevant activities; the scope of these changes is just for en-route procedures, not airports. Airports will complete their own airspace change proposals to remove dependencies for airport-specific local procedures, such as SIDs and approaches.

The changes are purely technical changes which will not lead to any material change to the current operation.

In order to provide full transparency, NATS has engaged with the above airports which will need to have their AIP sections amended in support of the changes within this ACP (see Annex 15.7). Appropriate airport representatives have been informed about these changes prior to submission of this ACP. Assuming approval of this ACP, the affected airports will then be advised, and permission sought to amend their sections of the AIP.

² The CAA agreed that this proposal falls under the airspace change process as a Level 2C proposal. This is a proposal which reflects the current use of airspace concerned and does not alter traffic patterns below 7,000ft. The Government's Air Navigation Guidance states that below 7,000ft is the maximum height at which noise is a priority for consideration; therefore, noise analysis has not been completed for this proposal.

In particular, the engagement with East Midlands has influenced the final design. Initial designs proposed that the PIGOT Hold might better fit RNAV design criteria with the holding fix at UPDUK and this was originally proposed. Engagement with East Midlands Airport identified this would create significant issues for the EMA EFPS, based on PIGOT, as well as the 'without radar control' procedures which would require amending slightly. Following this feedback, various options were explored, and it is now proposed to RNAV replicate with PIGOT remaining as the Holding fix.

PIGOT 1H STAR will have a new waypoint (MIHAK) added at the Speed Limiting Point and PIGOT 1J STAR will be extended back to HEMEL (HEMEL 1E) to allow for the Standing Agreement of FL220 HEMEL on this STAR to be incorporated. Both will continue to PIGOT as per current procedures, as described in Annex 15.4.

East Midlands Airport have been engaged with all these proposals and have influenced these designs, with no objections to current proposals.

If the proposal is approved, the CAA will also organise appropriate co-ordination with ICAO prior to implementation.

7.3 Consultation

A CAA-led consultation was held with National Air Traffic Management Advisory Committee (NATMAC) in 2009, with a NATMAC Informative produced on 7th October 2010. Airlines were broadly supportive, with the NATS reduction in expenditure as a benefit.

7.4 Military impact and consultation

No military airspace user stakeholders were identified as being impacted by the proposed changes. The changes are purely technical changes which will not lead to any material change to the current operation.

7.5 General Aviation airspace users impact and consultation

No General Aviation/ VFR airspace user stakeholders have been identified as being impacted by the proposed changes.

7.6 Commercial air transport impact and consultation

There would only be technical changes for commercial air transport such as nomenclature and RNAV5 route replication. There would be no impact to connectivity or flight behaviour, as there would be no change to lateral or vertical tracks, nor to impact adjacent IFPs.

No commercial air transport/ IFR stakeholders were identified as being impacted by the proposed changes; other than the nomenclature changes mentioned.

7.7 CO₂ environmental analysis impact and consultation

There would be no change in fuel, CO₂ or greenhouse gas emissions as a result of the proposed changes because there would be no change to lateral or vertical tracks, or to impact adjacent IFPs. Fuel uplift changes are unlikely to occur. The actual fuel uplift is very difficult to quantify, however there is an established relationship between distance flown and the amount of fuel uplift. As this proposal will not impact the distance flown, we can deduce that the fuel uplift should not change.

This aligns with the design principle DP1 which is driving this change, of ensuring that none of the proposed technical changes to IFP definitions result in any changes to actual flight behaviours.

7.8 Local environmental impacts and consultation

There would be no change in environmental impacts, such as noise or tranquillity, as a result of the proposed changes because there would be no change to lateral or vertical tracks, nor any impact to adjacent IFPs.

This aligns with the design principle DP1 which is driving this change, of ensuring that none of the proposed technical changes to IFP definitions result in any change to actual flight behaviours.

7.9 Economic impacts

The cost to the ANSP (NATS) for implementation of the change and adaptation of systems is estimated to be approx. £65,000.

Removal of the en-route dependency enables decommissioning of the VOR (once airfields have removed their dependencies i.e. SIDs). This will yield an annual cost saving of circa £10,000 per VOR. However, the development of this airspace change proposal has not been motivated by economic constraints or opportunities.

8. Analysis of Options

8.1 Airspace Change Design Options

In order to remove the en-route IFP dependencies on DTY DVOR, NATS developed four separate options on how best to adapt the UK airspace in support of this. These are known as Option 0 (do nothing), Option 1, Option 2 and Option 3. They are also summarised in the Stage 2 Gateway document (Ref 3).

The first considered option, of doing nothing, would retain all the current STARs and Holds unchanged from today's AIP definition. Options 1, 2 and 3 involve making changes to today's AIP definition. The Options are:
Option 1: Using CAA policies, replicate STARs/Holds using RNAV, exactly as defined in the AIP without considering any practicalities.

Option 2: Examine the use of existing STARs and Holds from a practical point of view, re-evaluate how they are used and how the network may be improved by rationalising/ truncating/ replicating them in a considered manner.

Option 3: Remove all existing STARs and Holds that refer to, or use, DTY DVOR.

8.2 Design Options Assessment

8.2.1 Design Principles

Design principles have been created in order to assess the four options. They have been constructed around the general objectives for this airspace change proposal, such as removing the en-route dependencies from DTY DVOR and reviewing the relevance of existing procedures. For example, this ACP is proposing to withdraw several STARs after reviewing them and concluding that they are not needed once other STARs have been replicated to an RNAV5 specification or are no longer utilised sufficiently to justify retaining them.

The analogy of a toolbox was used to describe potential methods of removing the en-route dependencies from DTY DVOR, with each tool having a particular function, in combination with other tools when appropriate. This analogy has been used to construct the design principles around.

The overriding design principle (DP0), with the highest priority, for this airspace change is that the proposed airspace change must "maintain or enhance the current level of safety".

All of the design principles for this proposal are:

Design Principle	Description
DP0 Safety	The airspace change must maintain or enhance the current level of safety
DP1 Flight behaviour	None of the proposed technical changes to the definition of STARs/ Holds would result in a change to actual flight behaviours – laterally, vertically or in dispersal.
DP2 Admin	Remove unnecessary references to DTY DVOR which are not material to the procedure

DP3 Withdraw	Some STARs are rarely used, some do the same job, some have segments in common with other STARs (see DP5 Truncate)
DP4 Replicate	PBN Replication – replace conventional STARs/Holds with RNAV STARs/Holds
DP5 Truncate	CAA STAR Truncation Policy used here. When applied logically to STARs with many common segments, can result in withdrawal of unnecessary duplicate STARs (DP3) When the final arrangement is decided, the truncated conventional STAR is always RNAV-replicated (DP4). In the case of a change to the actual vertical profile flown in the STAR, additional fuel/CO ₂ analysis and justification for this will be provided.
DP6 Technical amendment	Minor changes to a STAR/ Hold which currently cannot be flown as it is formally defined, for legacy reasons – these changes always reflect what would actually happen in practical terms.

The seven design principles summarised above have been detailed fully in the Stages 2 Gateway document (Ref 3), which includes a contextual example of each design principle being put into practice.

8.2.2 Options Assessment using the Design Principles

The four options outlined in Section 8.1 above were assessed against the following seven design principles:

- Design Principle 0: maintain or enhance the current level of safety
- Design Principle 1: no change to flight behaviours
- Design Principle 2: administrative change
- Design Principle 3: withdraw unnecessary STARs
- Design Principle 4: replicate using RNAV replication policies
- Design Principle 5: truncate original STAR then replicate the remainder
- Design Principle 6: technical amendment

The four Design Options were qualitatively assessed against each design principle in order to evaluate whether the principle had been met, partially met or not at all. The first Option 0, of doing nothing, did not meet any of the design principles except for DP0 and DP1: maintain/ enhance the current level of safety and introduce no changes to flight behaviours. Option 0 therefore does not achieve the removal of dependencies from DTY DVOR nor improves the network in any way; and has therefore been rejected.

Option 1 - replication of each STAR/ Hold - fully met four design principles: maintain/ enhance the current level of safety; introduce no changes to flight behaviours; withdraw unnecessary STARs; and replicate using RNAV replication policies. However, it did not meet any of the final three design principles. Although Option 1 removes DTY DVOR dependency, it does not improve the network connectivity; does not account for current usage levels and it leaves route duplication in place. Therefore Option 1 has also been rejected.

Although Option 3 removes dependencies from DTY DVOR, as a consequence of removing all IFPs, it does not fully meet any of the seven design principles; offering no network improvements but significant disruption. Option 3 was therefore rejected.

Option 2 involves an individual evaluation of each STAR and Hold. As this option focussed on a flexible approach for removing the DVOR dependencies, it was able to fully meet all the proposed design principles.

The conclusion of this assessment was to reduce the number of design options to one, known as Option 2 which best meets all the Design Principles. This option removes the DVOR dependencies whilst also improving the overall network connectivity, reducing duplication and taking into consideration the current usage levels. A full summary of the above options assessment can be found in Section 2 of the Stage 2 Gateway document (Ref 3).

9. Airspace Description Requirements

	The proposal should provide a full description of the proposed change including the following:	Description for this proposal
a	The type of route or structure; for example, airway, UAR, Conditional Route, Advisory Route, CTR, SIDs/ STARs, holding patterns etc.	STARs, en-route/ terminal holding patterns and ATS routes - see Section 6.
b	The hours of operation of the airspace and any seasonal variations	H24 (unchanged from today)
c	Interaction with domestic and international en-route structures, TMAs or CTAs with an explanation of how connectivity is to be achieved. Connectivity to aerodromes not connected to CAS should be covered	This proposal would not have any impact on current connectivity - see Section 6.2 and Annex Sections 15.3 to 15.6.
d	Airspace buffer requirements (if any). Where applicable describe how the CAA policy statement on 'Special Use Airspace – Safety Buffer Policy for Airspace Design Purposes' has been applied.	N/A – this proposal does not change any existing/ introduce new buffers.
e	Supporting information on traffic data including statistics and forecasts for the various categories of aircraft movements (passenger, freight, test and training, aero club, other) and terminal passenger numbers	This proposal would have no impact on airspace usage - see Sections 4.2 and 6.2.
f	Analysis of the impact of the traffic mix on complexity and workload of operations	This proposal would have no impact on the traffic mix - see Sections 4.2 and 6.2.
g	Evidence of relevant draft Letters of Agreement, including any arising out of consultation and/or airspace management requirements	N/A – this proposal does not change any existing/ introduce new LoAs; cross-border elements are not impacted.
h	Evidence that the airspace design is compliant with ICAO Standards and Recommended Practices (SARPs) and any other UK policy or filed differences, and UK policy on the Flexible Use of Airspace (or evidence of mitigation where it is not)	STAR Replication policy and PANS-OPS compliance – see design reports (Ref 4).
i	The proposed airspace classification with justification for that classification	No change to existing airspace classification.
j	Demonstration of commitment to provide airspace users equitable access to the airspace as per the classification and where necessary indicate resources to be applied or a commitment to provide them in line with forecast traffic growth. 'Management by exclusion' would not be acceptable	N/A - this proposal does not change any existing/ introduce new airspace user access.
k	Details of and justification for any delegation of ATS	No change to the delegation of ATS.

10. Safety Assessment

10.1 There is an overriding safety design principle for the proposed changes which states that safety should be at least maintained, or improved, as an impact of the changes.

10.2 The safety of the IFP changes has been assured by NATS Design who have worked alongside the CAA SARG IFP Regulator.

10.3 Prior to implementation, NATS will also undertake a formal Hazard Analysis in order to prove that the proposed changes are safe to be implemented into the operational environment.

10.4 The Option 2 concept would take full account of existing usage and connectivity needs. It would ensure that all IFPs are designed and checked by a suitably qualified APD, as regulated by CAA SARG.

10.5 There would be a qualitative improvement in safety because each remaining IFP would use improved navigation specifications and be defined in an official manner. Today's conventional IFPs are known to be flown using FMS overlays, which are not state regulated in the same way.

10.6 Where STARs have been truncated as part of this proposal, we have ensured that appropriate/ safe connectivity is still provided; by identifying common route segments which can be used. These will also be assessed as part of the safety hazard analysis, mentioned above in 10.3.

10.7 Where STARs have been extended and/or additional STARs established as part of this proposal to ensure important Descent Planning levels are maintained as per today, we have ensured that appropriate and safe connectivity is still provided, by identifying common route segments which can be used, which replicates procedures flown today. These will also be assessed as part of the safety hazard analysis, mentioned above in 10.3.

10.8 Where IFPs have been withdrawn as part of this proposal, we have ensured that appropriate/ safe connectivity is still provided and that there are no impacts. We have used historical flight data to assess usage (summarised in Section 15.3 below).

10.9 Therefore, there would be a positive impact on safety whilst also improving the overall network connectivity. This is dependent on the satisfactory completion of the hazard analysis.

11. Operational Impact

	An analysis of the impact of the change on all airspace users, airfields and traffic levels must be provided, and include an outline concept of operations describing how operations within the new airspace will be managed. Specifically, consideration should be given to:	Evidence of compliance/ proposed mitigation
a	Impact on IFR general air traffic and operational air traffic or on VFR General Aviation (GA) traffic flow in or through the area	No impact to air traffic (technical change only) – see Sections 7.5 - 7.6.
b	Impact on VFR operations (including VFR routes where applicable);	No impact on VFR operations. See Section 7.5 -7.6.
c	Consequential effects on procedures and capacity, i.e. on SIDs, STARs, and/or holding patterns. Details of existing or planned routes and holds	No impact on procedures or capacity (technical change only) - see Section 6.2.

d	Impact on aerodromes and other specific activities within or adjacent to the proposed airspace	No impact on aerodromes or other relevant activities – see Section 7.2.
e	Any flight planning restrictions and/or route requirements	No impact – technical changes only.

12. Supporting Infrastructure/ Resources

	General requirements	Evidence of compliance/ proposed mitigation
a	Evidence to support RNAV and conventional navigation as appropriate with details of planned availability and contingency procedures	N/A – current RNAV5 coverage is demonstrably adequate
b	Evidence to support primary and secondary surveillance radar (SSR) with details of planned availability and contingency procedures	Traffic uses the same regions as today in a similar manner from a surveillance point of view. Demonstrably adequate for the region.
c	Evidence of communications infrastructure including R/T coverage, with availability and contingency procedures	Traffic uses the same regions as today in a similar manner from a comms infrastructure point of view. Demonstrably adequate for the region.
d	The effects of failure of equipment, procedures and/or personnel with respect to the overall management of the airspace must be considered	Existing contingency procedures based on the conventional navigation DTY DVOR would no longer be required and will be withdrawn. RNAV replication removes the en-route dependency from DTY DVOR/WHI NDB. Other existing contingency procedures and management protocol will continue to apply as today.
e	Effective responses to the failure modes that will enable the functions associated with airspace to be carried out including details of navigation aid coverage, unit personnel levels, separation standards and the design of the airspace in respect of existing international standards or guidance material	As above (12d).
f	A clear statement on SSR code assignment requirements	No change to SSR code allocation.
g	Evidence of sufficient numbers of suitably qualified staff required to provide air traffic services following the implementation of a change	No training or additional qualifications required.

13. Airspace and Infrastructure

	General requirements	Evidence of compliance/ proposed mitigation
a	The airspace structure must be of sufficient dimensions with regard to expected aircraft navigation performance and manoeuvrability to fully contain horizontal and vertical flight activity in both radar and non-radar environments	As today - no proposed changes to the airspace structure (technical changes only). See Section 6.2.
b	Where an additional airspace structure is required for radar control purposes, the dimensions shall be such that radar control manoeuvres can be contained within the structure, allowing a safety buffer. This safety buffer shall be in accordance with agreed parameters as set down in CAA policy statement 'Safety Buffer Policy for Airspace Design Purposes Segregated Airspace'. Describe how the safety buffer is applied, show how the safety buffer is portrayed to the relevant parties, and provide the required agreements between the relevant ANSPs/ airspace users detailing procedures on how the airspace will be used. This may be in the form of Letters of Agreement with the appropriate level of diagrammatic explanatory detail.	As today - no proposed changes to the airspace structure (technical changes only).
c	The Air Traffic Management system must be adequate to ensure that prescribed separation can be maintained between aircraft within the airspace structure and safe management of interfaces with other airspace structures	As today - no proposed changes to the existing airspace structure (technical changes only).
d	Air traffic control procedures are to ensure required separation between traffic inside a new airspace structure and traffic within existing adjacent or other new airspace structures	As today – no proposed changes to the existing ATC procedures.
e	Within the constraints of safety and efficiency, the airspace classification should permit access to as many classes of user as practicable	As today - no proposed changes to existing airspace classifications.
f	There must be assurance, as far as practicable, against unauthorised incursions. This is usually done through the classification and promulgation	As today – no proposed changes to airspace classification or volume.
g	Pilots shall be notified of any failure of navigational facilities and of any suitable alternative facilities available and the method of identifying failure and notification should be specified	Existing contingency procedures would continue to apply.
h	The notification of the implementation of new airspace structures or withdrawal of redundant airspace structures shall be adequate to allow interested parties sufficient time to comply with user requirements. This is normally done through the AIRAC cycle	No proposed new structures and all changes will be promulgated through the AIRAC cycle.
i	There must be sufficient R/T coverage to support the Air Traffic Management system within the totality of proposed controlled airspace	No change from today's Controlled Airspace. R/T coverage demonstrably adequate as per current day.
j	If the new structure lies close to another airspace structure or overlaps an associated airspace structure, the need for operating agreements shall be considered	No proposed new structures.

k	Should there be any other aviation activity (low flying, gliding, parachuting, microlight site, etc.) in the vicinity of the new airspace structure and no suitable operating agreements or air traffic control procedures can be devised, the change sponsor shall act to resolve any conflicting interests	No proposed new airspace structures.
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	ATS route requirements	Evidence of compliance/ proposed mitigation
a	There must be sufficient accurate navigational guidance based on in-line VOR/DME or NDB or by approved RNAV derived sources, to contain the aircraft within the route to the published RNP value in accordance with ICAO/ Eurocontrol standards	RNAV5 navaid coverage is demonstrably adequate. DME coverage is adequate and demonstrated in the coverage plots in Reference 5.
b	Where ATS routes adjoin terminal airspace there shall be suitable link routes as necessary for the ATM task	As today – there are no new link routes required as part of this proposal.
c	All new routes should be designed to accommodate P-RNAV navigational requirements	Confirmed - RNAV5 will be used.

	Terminal airspace requirements	Evidence of compliance/ proposed mitigation
a	The airspace structure shall be of sufficient dimensions to contain appropriate procedures, holding patterns and their associated protected areas	As today - no proposed changes to the airspace structure.
b	There shall be effective integration of departure and arrival routes associated with the airspace structure and linking to designated runways and published instrument approach procedures (IAPs)	As today - no proposed changes to the airspace structure.
c	Where possible, there shall be suitable linking routes between the proposed terminal airspace and existing en-route airspace structure	As today - the revised STARs will end in the same locations as they do currently.
d	The airspace structure shall be designed to ensure that adequate and appropriate terrain clearance can be readily applied within and adjacent to the proposed airspace	As today - no change to the airspace structure.
e	Suitable arrangements for the control of all classes of aircraft (including transits) operating within or adjacent to the airspace in question, in all meteorological conditions and under all flight rules, shall be in place or will be put into effect by the change sponsor upon implementation of the change in question (if these do not already exist)	As today - no change to the airspace structure.
f	The change sponsor shall ensure that sufficient visual reference points are established within or adjacent to the subject airspace to facilitate the effective integration of VFR arrivals, departures and transits of the airspace with IFR traffic	As today - no change to visual reference points.

g	There shall be suitable availability of radar control facilities	As today - no change to radar control facilities.
h	The change sponsor shall, upon implementation of any airspace change, devise the means of gathering (if these do not already exist) and of maintaining statistics on the number of aircraft transiting the airspace in question. Similarly, the change sponsor shall maintain records on the numbers of aircraft refused permission to transit the airspace in question, and the reasons why. The change sponsor should note that such records would enable ATS managers to plan staffing requirements necessary to effectively manage the airspace under their control	As today - there are no proposed changes to the airspace structure.
i	All new procedures should, wherever possible, incorporate Continuous Descent Approach (CDA) profiles after aircraft leave the holding facility associated with that procedure	As today – no new procedures.

	Off-route airspace requirements	Evidence of compliance/ proposed mitigation
	There are no proposed changes to off-route airspace structures	

14. Environmental Assessment

	Theme	Content	Evidence of compliance/ proposed mitigation
a	WebTAG analysis	Output and conclusions of the analysis (if not already provided elsewhere in the proposal)	N/A – no change in CO ₂ or greenhouse gas emissions. See Section 7.77
b	Assessment of noise impacts (Level 1/M1 proposals only)	Consideration of noise impacts, and where appropriate the related qualitative and/or quantitative analysis If the change sponsor expects that there will be no noise impacts, the rationale must be explained	N/A – this is a Level 2C change.
c	Assessment of CO ₂ emissions	Consideration of the impacts on CO ₂ emissions, and where appropriate the related qualitative and/or quantitative analysis If the change sponsor expects that there will be no impact on CO ₂ emissions impacts, the rationale must be explained	N/A – no change in CO ₂ or greenhouse gas emissions. See Section 7.7
d	Assessment of local air quality (Level 1/M1 proposals only)	Consideration of the impacts on local air quality, and where appropriate the related qualitative and/or quantitative analysis If the change sponsor expects that there will be no impact on local air quality, the rationale must be explained	N/A – this is a Level 2C change

e	Assessment of impacts upon tranquillity (Level 1/M1 proposals only)	Consideration of any impact upon tranquillity, notably on Areas of Outstanding Natural Beauty or National Parks, and where appropriate the related qualitative and/or quantitative analysis If the change sponsor expects that there will be no tranquillity impacts, the rationale must be explained	N/A – this is a Level 2C change.
f	Operational diagrams	Any operational diagrams that have been used in the consultation to illustrate and aid understanding of environmental impacts must be provided	See the Assessment meeting slide pack (Ref 2) No change to environmental impacts, as covered in Section 7.7
g	Traffic forecasts	10-year traffic forecasts, from the anticipated date of implementation, must be provided (if not already provided elsewhere in the proposal)	No foreseeable changes to capacity or usage - see Section 4.2.
h	Summary of environmental impacts and conclusions	A summary of all of the environmental impacts detailed above plus the change sponsor's conclusions on those impacts	No foreseeable environmental impact - see Section 7.7.

14.1 Reversion Statement

Should the proposal be approved and implemented, reversion to the pre-implementation state would only be possible if the conventional navaid is kept in operation. Once the navaid is removed it would not be possible to revert to the pre-implementation state.

DTY DVOR is scheduled to be decommissioned and physically removed in 2022 or sooner if all aerodrome dependencies are removed before then.

In the unlikely event that there are unexpected issues caused by this proposal, then short notice changes could be made via NOTAM or by adding Route Availability Document (RAD) restrictions. For a permanent reversion, the changes would have to be reversed by incorporating this into an appropriate future AIRAC date. Due to the limitations of NATS Area System (NAS - flight and radar data processing) large scale airspace changes are usually only implemented four times a year.

15. Appendices

15.1 References

Ref No	Name	Hyperlink
1	Statement of Need for DTY DVOR, DAP1916 #3507	Link
2	DTY DVOR CAP1616 Stage 1 Assessment Meeting Slides	Link
3	DTY DVOR CAP1616 Stage 2 Gateway V2.2	Link
4	AIP changes in support of DVOR rationalisation for DTY	Supplied direct to CAA
5	NATS Design Ltd. DTY DVOR Design Report (IFP Report) V2.0	Supplied direct to CAA
6	SARG Policy: Policy for the replication of conventional SIDs, STARs and Holds using PBN	Link

15.2 Statement of Need for DTY ACP (DAP1916 #3507)

Current Situation:

Requirement to remove the en-route dependency on DTY DVOR in order for the DVOR to be decommissioned.

Issue:

Aircraft currently fly conventional STARs and Holds which refer to Daventry VOR. There are no ATS route dependencies on DTY VOR. The need is for procedures to be replicated as RNAV as closely as possible to the current Conventional STARs and Holds using RNAV Design Criteria. This includes:

extend/establish new STAR(s) as appropriate that replicate extant STAR(s)

remove any STARs no longer required for contingency purposes as a result of establishing RNAV versions of the primary STAR(s)

review STAR usage to identify continued requirement and remove as appropriate

replicate Holds as appropriate as RNAV versions as required

Establish DCTs as appropriate to replace any removed STARs

Action:

Identification of relevant procedures and the impact on relevant stakeholders to be investigated, and changes to be implemented under the CAP1616 Airspace Change Process.

15.3 Impact assessment: Birmingham Hold and STARs

See the redacted Stage 1 Assessment Meeting Presentation (Ref 2) for charts for the current IFPs. See Annex B of Stage 2 Gateway document (Ref 3) for the proposed changes.

Current IFP	Current route connectivity/STAR	Design Principle	How	Proposed route Connectivity/STAR	Impact of proposed change on connectivity Impact of proposed change on flight behaviour
CHASE Hold	N/A	4 Replicate	RNAV5 Replication	Not required	Same, no impact to connectivity. No predicted change to flight behaviour.
CHASE 1C STAR	L975, L10: WAL – CREWE – CHASE	2 Administrative 4 Replicate	RNAV5 Replication	L975, L10: WAL – CREWE – CHASE Rename as WAL 1B	Same, no impact to connectivity. No predicted change to flight behaviour. 'B' indicator used to designate destination airport.
CHASE 3A STAR	L975, L10: WAL VOR – WHI NDB – CHASE	3 Withdraw	Not required	Not required	This STAR is restricted for use by traffic FL70 and below. Due to no utilisation it is no longer required. No traffic has used this STAR in 2018 & 2019. No predicted change to flight behaviour.
CHASE 2D STAR	(U)Y124, (U)L975, Q37, L15, Q38: AMPIT – NOKIN – CREWE – CHASE	2 Administrative 4 Replicate 5 Technical	RNAV5 Replication Realign STARS to extend over existing ATS route network to capture descent planning levels	(U)L975, Q37: MALUD – AMPIT – NOKIN – CREWE – CHASE Rename as MALUD 1B L15, Q38: MAKUX – MALUD – AMPIT – NOKIN – CREWE – CHASE Rename as MAKUX 1B (U)Y124: DOLOP – AMPIT – NOKIN – CREWE – CHASE Rename as DOLOP 1B	The CHASE 2D commences at AMPIT. The extant STAR has 3 important descent planning levels of FL270 dependent on the arrival route: FL270 by MALUD (UL975/Q37) FL270 by MAKUX (L15/Q38) FL270 by DOLOP (UY124) The route via Q36 is RAD restricted for traffic departing Dublin only and it is also Level capped in the RAD at FL270 and hence there is no requirement for a Descent planning level of FL270 on this STAR. RNAVing the CHASE 2D as it will remove these planning levels. This can affect Top of Descent calculations in the FMS as well as inappropriate fuel uplift, and cause greater workload both to ATC and flight-crews alike. By re-aligning the STARS to commence at these points, the descent profiles will be retained - this will increase predictability and reduce workload.

Current IFP	Current route connectivity/STAR	Design Principle	How	Proposed route Connectivity/STAR	Impact of proposed change on connectivity Impact of proposed change on flight behaviour
				Q36: <i>NOSLO – AMPIT – NOKIN – CREWE – CHASE</i> Rename as NOSLO 1B	This is a technical amendment and will have no impact on connectivity. No predicted change to flight behaviour. 'B' indicator used to designate destination airport.
OLIVE 3A STAR	L10, Q3, L610, T420: <i>BUZAD – DTY – OSKOT – OLIVE</i>	3 Withdraw	Not required	No longer required as only used when HON VOR is u/s.	This STAR is currently for when HON is OOS so is no longer required. No predicted change to flight behaviour.

15.4 Impact assessments – East Midlands Hold and STARs

See the redacted Stage 1 Assessment Meeting Presentation (Ref 2) for charts and technical notes for current IFPs. See Annex B of Stage 2 Gateway document (Ref 3) for the proposed changes.

Current IFP	Current route connectivity/STAR	Design Principle	How	Proposed route Connectivity/STAR	Impact of proposed change on connectivity Impact of proposed change on flight behaviour
PIGOT Hold	N/A	2 Admin 4 Replicate	RNAV replication	Not required	Same, no impact to connectivity. No predicted change to flight behaviour
PIGOT 1H STAR	L10 & M605: <i>DTY – VELAG – UPDUK – PIGOT</i>	2 Admin 4 Replicate 6 Technical	RNAV replication. New waypoint MIHAK added at the SLP.	L10, M605: <i>DTY – MIHAK – VELAG – UPDUK – PIGOT</i> Rename as DTY 1E	Same, no impact to connectivity. No predicted change to flight behaviour. 'E' indicator used to designate destination airport.
PIGOT 1J STAR	L608, N57, T420: <i>WELIN – VELAG – UPDUK – PIGOT</i>	2 Admin 4 Replicate 6 Technical	RNAV Replication Extended back to HEMEL.	L608, N57, T420: <i>HEMEL – WELIN – VELAG – UPDUK – PIGOT</i> Rename as HEMEL 1E	Same, no impact to connectivity. No predicted change to flight behaviour. 'E' indicator used to designate destination airport.

15.5 Annex E: Impact assessment – Luton/Stansted STAR

See the redacted Stage 1 Assessment Meeting Presentation (Ref 2) for charts for the current IFPs. See Annex B of Stage 2 Gateway document (Ref 3) for the proposed changes.

Current IFP	Current route connectivity/STAR	Design Principle	How	Proposed route Connectivity/STAR	Impact of proposed change on connectivity Impact of proposed change on flight behaviour
LOREL 1K	M605: <i>DTY VOR – FINMA – BOMBO – BKY – BUSTA – LOREL</i>	2 Admin 4 Replicate 5 Truncate	RNAV Replication Truncated to FINMA	M605: <i>FINMA – BOMBO BKY –BUSTA – LOREL</i> <i>Rename as FINMA 1L</i>	Same, no impact to connectivity. No predicted change to flight behaviour. 'L' indicator used to designate destination holding fix "LOREL".

15.6 Annex F: Impact assessment – En route Hold

See the redacted Stage 1 Assessment Meeting Presentation (Ref 2) for charts for the current IFPs. See Annex B of Stage 2 Gateway document (Ref 3) for the proposed changes.

Current IFP	Current route connectivity/STAR	Design Principle	How	Proposed route Connectivity/STAR	Impact of proposed change on connectivity Impact of proposed change on flight behaviour
DTY Hold	N/A	3 Withdraw	N/A	Not required	This Hold is not currently utilised. No predicted change to flight behaviour.

15.7

This section summarises the engagement activities we conducted, which influenced the design decisions / considerations. Copies of the engagement material have been sent to the CAA.

Table 3: Engagement with Airports for DTY proposed changes

Stakeholder	Type of engagement	Date	Notes
Birmingham Airport ATC	Email	07/11/2019	Initial email outlining proposed changes to STARs/Holds as part of DVOR Rationalisation; seeking feedback
Birmingham Airport ATC	Meeting	18/12/2019	Meeting to review proposed changes. Minutes of meeting sent via email.
East Midlands Airport ATC	Email	21/11/2019	Initial email outlining proposed changes to STARs/Holds as part of DVOR Rationalisation; seeking feedback
East Midlands Airport ATC	Meeting	18/12/2019	Meeting to review proposed changes in line with EMA ACP for DTY SIDs. Minutes of meeting sent via email.
Luton Airport ATC	Email	07/11/2019	Initial email outlining proposed changes to STARs/Holds as part of DVOR Rationalisation; positive response
Stansted Airport ATC	Email	07/11/2019	Initial email outlining proposed changes to STARs/Holds as part of DVOR Rationalisation; positive response

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