# Free Route Airspace Deployment 2.1 PEMAK Triangle, TAKAS Box

Gateway documentation: Stage 1 Define

Step 1B Design Principles

and Stakeholder Engagement Feedback



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#### 1. Introduction

1.1 This document forms part of the document requirements for CAP1616 Airspace Change Process (ACP), Stage 1 Define Gateway, Step 1B Design Principles. This document should be read in conjunction with Stage 1A documentation; Statement of Need and Assessment Meeting Minutes.



Figure 1 Overview of the UK Airspace Change Process (CAP1616)

- 1.2 NATS is in the process of proposing airspace changes to implement Free Route Airspace (FRA) within high altitude airspace across the UK, as mandated by European Law. UK FRA is planned to be introduced in a phased manner, split into four main deployments within the UK airspace. This plan was developed in alliance with neighbouring Air Navigation Service Providers (ANSPs). Each phased deployment of FRA is being progressed as an individual ACP under CAP1616, and each is therefore following similar (parallel) workstream.
- 1.3 This ACP seeks to enable Brest and Shannon ACCs to operate FRA in airspace above FL245 where the provision of ATS has been delegated to them.
- 1.4 These two volumes FL245-FL660 are known as the PEMAK triangle and TAKAS box, and collectively are referred to as 'the region' in this document. The region is illustrated in Figure 2 overleaf.
- 1.5 NATS does not provide an air traffic service to aircraft in the region.
- 1.6 NATS sponsors this ACP on behalf of Brest ACC and Shannon ACC, the ATS providers in the region.
- 1.7 The UK FRA deployment plan initially sought to introduce FRA in this region as part of the second FRA deployment, known as FRA D2, which originally aligned with Brest and Shannon ACCs' airspace change requirements and schedule.
- 1.8 The UK's FRA timeline has changed but the Brest/Shannon timeline cannot.
- 1.9 For this reason, the PEMAK triangle and TAKAS box 'the region' has been removed from the original scope of UK FRA D2 and is now progressing separately, as FRA D2.1, in accordance with Brest ACC's timelines and requirements.



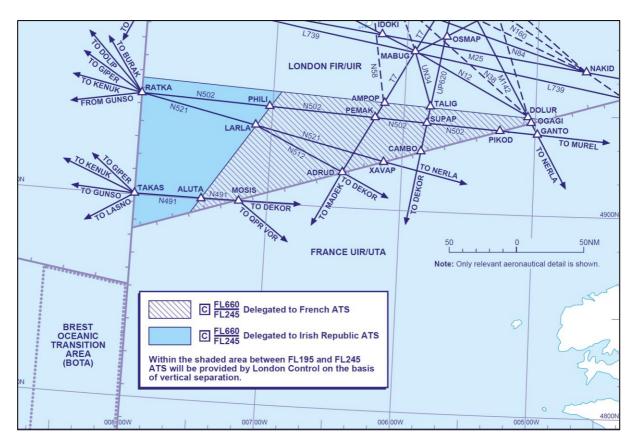


Figure 2 Extract from UK AIP ENR 6-48 illustrating the region

- 1.10 Early engagement with Brest and Shannon ACCs articulated the constraints associated with this proposal:
  - Brest ACC must deploy FRA to meet the extant PCP mandate: Flexible Airspace Management and Free Route shall be provided and operated in the airspace for which the Member States are responsible at and above FL310 in the ICAO EUR region...from 1 January 2022.
  - Brest ACC's Flight Data Processing system (FDP) **cannot** operate in a mixed mode, i.e. where one volume of airspace is FRA and another part consists of a 'conventional' ATS route structure.
  - NATS sponsors this airspace change but does **not** provide an air traffic service to aircraft in the
    region. ATS in this region has been delegated to Brest and Shannon for decades. The flows in the
    region essentially join Brest's Area of Responsibility (AOR) with the AOR of Shannon, crossing a
    small sliver of southwestern UK airspace FL245+ without any interaction by UK (NATS) controllers.
  - The French and Irish primary radar cover in this region at FL245 is **better** than that available to NATS controllers (see UK AIP ENR 6-10).
  - Brest ACC has a fully mature airspace design for the entire Brest ACC AOR, including this region, suitable for their FDP system.
  - Brest ACC has followed **French airspace change process** regulatory requirements to develop their design NATS has no influence on that process.
  - The IAA already operate FRA (fulfilling the PCP mandate). Provisionally, the IAA is content to change the airspace within the TAKAS box in accordance with Brest ACC's requirements and timeline.
- 1.11 To minimise stakeholder engagement fatigue (particularly for those already engaged through other UK FRA deployments), NATS considers it proportional to limit stakeholder engagement regarding design principles activities to targeted stakeholders via email only.



## 2. How this document is laid out

- 2.1 This document describes how stakeholder feedback has influenced the design principles for FRA D2.1.
- 2.2 The proposed design principles were sent to all stakeholders for feedback with a two-week review period from 28<sup>th</sup> July to 10<sup>th</sup> August 2020. Those who did not respond were sent a reminder on 10<sup>th</sup> August and given an extended deadline of 14<sup>th</sup> August after which NATS considers that adequate engagement effort was made.
- 2.3 Minor feedback was received, which did not result in a change to any of the originally proposed DPs, after the initial feedback on the Design Principles hence they are now being progressed under the Airspace Change Process CAP1616 Stage 1 Step 1B.
- 2.4 Summary Section 3 lists the final Design Principles (DPs) after stakeholder feedback has been considered. The relative priorities for each DP are also identified and indicated in the same Section 3, next to each DP.
- 2.5 Engagement on specific design concepts/options will happen in Stage 2, and formal consultation in Stage 3. The design concepts will be evaluated against the final design principles presented here.
- 2.6 The next sections discuss each DP in turn. In accordance with recommended engagement/consultation practice<sup>1</sup> this is structured as follows:
  - We asked The original discussion text of each draft DP (we sent this out, stakeholders provided feedback)
  - You said Agreement that the draft DP is acceptable, or a summary of how feedback has influenced the DP
  - We did Amended final DP (unless original was agreed upon)

This is repeated for each DP.

2.7 Section 13 summarises the engagement activity, numbers of responses and key stakeholders who were included in the engagement.

<sup>&</sup>lt;sup>1</sup> Recommended by the Consultation Institute and noted in CAP1616 para C10.



## 3. List of Design Principles (DP)

3.1 The following list summarises the final Design Principles which have resulted from engagement with our stakeholders. Priorities are indicated in brackets (A being the greatest priority). These priorities will be considered when the design principles are used to evaluate/rank design options in later stages of the airspace change process. How the DPs have evolved is described in detail in the next sections of the document.

Section of this document Design Principle (DP) (Priority) **DP0 Safety** (A) Section 4 Maintain or enhance current levels of safety. DP1 Operational (Resilience) (B) Section 5 The proposed airspace will maintain or enhance operational resilience of the ATC network. DP2 Operational (Impact to Stakeholders – Brest ACC) (A) Section 6 The proposed FRA airspace will be consistent with the airspace design requirements of DSNA Brest ACC. DP3 Operational (Impact to Stakeholders – Shannon ACC) Section 7 (A) The proposed FRA airspace will be consistent with the airspace design requirements of IAA Shannon ACC. DP4 Policy (PCP) (A) Section 8 The proposed FRA airspace will fulfil the requirements of the PCP. DP5 Technical (MoD Requirements) (B) Section 9 The FRA airspace will be compatible with the requirements of the MoD and take into consideration the requirements of defence industry stakeholders. DP6 Operational (Flexible Use Airspace Concept) (B) Section 10 The proposed FRA airspace will be compatible with the Flexible Use Airspace (FUA) concept. DP7 Operational (Adjacent ANSPs (NATS)) (B) Section 11 Connectivity to adjacent airspace (FRA or non-FRA) will be maintained or enhanced. DP8 Operational (Impact to Stakeholders -AOs) Section 12 (B) The proposed FRA airspace will be consistent with the requirements of airline operators and flight planning

Note: There is no Design Principle that specifically considers General Aviation because the existing airspace is Class C, FL245 and above, and wholly over the sea.

service providers.



## 4. DP0 Safety

4.1 Original discussion text

Maintain or enhance current levels of safety.

4.2 How has feedback influenced this DP?

The original wording of the DP was deliberately general.

It was not explicit that safety should apply to all airspace users (not just commercial air traffic), but equally it did not make explicit that safety should apply to those on the ground – all are implicitly included in the general statement.

Jeppesen's feedback was that nothing is equal to safety. NATS' inference was that Jeppesen believes this DP should be the absolute highest priority with all other DP priorities demoted one level.

NATS considered this, and decided that Priority A was appropriate and consistent with other UK FRA deployment ACPs.

Otherwise there was agreement, or no comment, on this DP hence it remains as originally proposed. Priority A assigned because safety is the highest priority.

## 5. DP1 Operational (Resilience)

5.1 Original discussion text

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

5.2 How has feedback influenced this DP?

There was agreement, or no comment, on this DP hence it remains as originally proposed. Priority B assigned because resilience is high priority.

## 6. DP2 Operational (Impact to Stakeholders – Brest ACC)

6.1 Original discussion text

The proposed FRA airspace will be consistent with the airspace design requirements of DSNA Brest ACC.

6.2 How has feedback influenced this DP?

There was agreement, or no comment, on this DP hence it remains as originally proposed. Priority A assigned because it is critical that the FRA design within the PEMAK triangle is consistent with the rest of the Brest ACC FRA airspace and compatible with Brest ACC's FDP.

# 7. DP3 Operational (Impact to Stakeholders – Shannon ACC)

7.1 Original discussion text

The proposed FRA airspace will be consistent with the airspace design requirements of IAA Shannon ACC.

7.2 How has feedback influenced this DP?

There was agreement, or no comment, on this DP hence it remains as originally proposed. Priority A assigned because it is critical that the FRA design within the TAKAS box is consistent with the rest of the Shannon ACC FRA airspace.



## 8. DP4 Policy (PCP)

8.1 Original discussion text

The proposed FRA airspace will fulfil the requirements of the PCP.

8.2 How has feedback influenced this DP?

The PCP mandate is a primary driver for the introduction of FRA hence it is important that the proposed FRA solution fulfils the PCP requirements.

There was agreement, or no comment, on this DP hence it remains as originally proposed. Priority A assigned because the PCP requirements are mandatory.

## 9. DP5 Technical (MoD Requirements)

9.1 Original discussion text

The FRA airspace will be compatible with the requirements of the MoD and take into consideration the requirements of defence industry stakeholders.

9.2 How has feedback influenced this DP?

There was agreement, or no comment, on this DP hence it remains as originally proposed. Priority B assigned because MoD requirements are high priority.

## 10. DP6 Operational (Flexible Use Airspace Concept)

10.1 Original discussion text

The proposed FRA airspace will be compatible with the Flexible Use Airspace (FUA) concept.

10.2 How has feedback influenced this DP?

There was agreement, or no comment, on this DP hence it remains as originally proposed. Priority B assigned because compatibility with the FUA concept is high priority.

## 11. DP7 Operational (Adjacent ANSPs (NATS))

11.1 Original discussion text

Connectivity to adjacent airspace (FRA or non-FRA) will be maintained or enhanced. Even though NATS is the sponsor of this proposal, NATS is the adjacent ANSP because ATS in the region is provided by Brest and Shannon ACCs.

11.2 How has feedback influenced this DP?

There was agreement, or no comment, on this DP hence it remains as originally proposed. Priority B assigned because efficient connectivity with adjacent ANSPs' airspace is high priority.

## 12. DP8 Operational (Impact to Stakeholders -AOs)

12.1 Original discussion text

The proposed FRA airspace will be consistent with the requirements of aircraft operators (AOs) and flight planning service providers.

12.2 How has feedback influenced this DP?

There was agreement, or no comment, on this DP hence it remains as originally proposed. Priority B assigned because consistency with the requirements of AOs and flight planning service providers is high priority.



## 13. Engagement Evidence

- 13.1 Engagement was undertaken in the development of these Design Principles for FRA D2.1.
- 13.2 We received design principle feedback from stakeholders for FRA D2.1, with most responses indicating contentment with the draft design principles.
- 13.3 We Asked Emails to relevant aviation industry interested parties, on draft proposed DPs.

  Emails were sent on 28<sup>th</sup> July 2020 to fourteen organisations, based on National Air Traffic Management Advisory Committee (NATMAC) contacts, adjacent ANSPs, and data houses. DSNA head office plus DSNA's Brest ACC were counted as two separate stakeholders for the purposes of this document. A response date of 7<sup>th</sup> August 2020 was set. On 10<sup>th</sup> August a hastening email was sent to non-responsive stakeholders, setting a final return date of 14<sup>th</sup> August. Two responses were received by the final return date and the Stage 1 engagement session was closed, to write this document.
- 13.4 Table 1 overleaf provides a summary of the engagement activity for FRA D2.1. Evidence is provided in an Annex where relevant.
- 13.5 You Said Stakeholder Responses

The response rate was 57% (8 stakeholders responded out of 14 canvassed).

- 4 (29%) returned either an email read-receipt or out-of-office reply, with no further response after hastening.
- 2 (14%) did not respond at all.
- 2 (14%) indicated that they did not wish to provide a comment at all.
- 7 (50%) indicated that they were content with the draft design principles, with no specific comments.
- 1 (7%) provided a comment on DPO (see the next paragraph, and also Section 4 p.7).
- 13.6 We Did Action taken following feedback

Jeppesen provided a comment on DP0 Safety, which was considered but did not ultimately change the DP (see Annex B)

A final draft of this document was sent to all stakeholders on 14th August 2020.

This demonstrated the two-way engagement, feedback receipt, consideration of that feedback, and confirmation of the DPs following this first round of engagement.

Final comments on this document were invited, and stakeholders were advised there was no need to respond if they had no additional comments. No further comments were received.



## 14. FRA D2.1 Key Stakeholders Engagement Summary

14.1 Note: any organisation or individual was welcome to provide input to the DP development process.

	Stakeholder	No comment	Accepted without comment	Total responses	Read Receipts/ out of office	No response
	BAE Systems		1			
	Airlines UK					1
MAC	BBGA					1
NATMAC	BGA	1				
_	Low Fares Airlines				1	
	MoD via DAATM		1			
Data houses, flight plan service providers	Jeppesen		1 (comment on DP0 Safety)			
ata house t plan ser providers	Lufthansa Systems				1	
Data houses, ght plan servi providers	NavBlue				1	
<u>;</u>	Sabre				1	
	Eurocontrol MUAC	1				
sPs	DSNA Airspace HQ		1			
ANSPs	DSNA ACC Brest		1			
	IAA Shannon ACC		1			
	Total and %	2	6	8	4	2
	14	14%	43%	57%	29%	14%

Table 1 FRA D2.1 PEMAK Triangle and TAKAS Box, Stage 1B Engagement Statistics

### 15. Conclusion

- 15.1 Throughout the design principles engagement, we supplied stakeholders with a set of draft design principles to provoke discussion, and welcomed feedback.
- We received feedback on one of the draft design principles (DP0), which was not amended as a result. We wrote to all stakeholders confirming that no changes were made following feedback, requesting final comments before publication and submission of CAP1616 Stage 1 documentation to the UK CAA.
- 15.3 There were no material responses to this final Stage 1 engagement request, and this document was published on the CAA's airspace change portal (<u>link</u>).

## 16. Next steps

- 16.1 The publication of this document on the CAA's airspace change portal concludes the submission of documentation required for Stage 1 of the CAP1616 airspace change process.
- 16.2 The CAA will study all published Stage 1 documents and decide, at a Gateway Assessment to be held on 25<sup>th</sup> September 2020, whether the airspace change process has been followed appropriately.
- 16.3 The CAA's airspace change portal will be updated with the result.
- 16.4 If this proposal passes the Gateway Assessment, progression to Stage 2 would be approved.

  If not, the CAA will provide feedback on any shortcomings, NATS would negotiate a resubmission date, and the proposal's timeline would be adjusted accordingly.



## Annex A: Engagement emails (outgoing – launch and hastening)

Launch email to all stakeholders sent 28/7/20

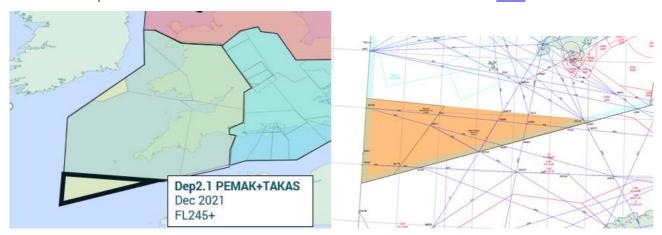
From: Airspace Consultation Sent: 28 July 2020 16:50

Cc: Airspace Consultation < redacted email @nats.co.uk>

Subject: Free Route Airspace PEMAK triangle (deployment FRA 2.1)

Dear Stakeholder

NATS has initiated an Airspace Change Proposal to introduce Free Route Airspace (FRA) within airspace where the provision of ATS has been delegated to Brest and Shannon ACCs. Specifically the PEMAK triangle and TAKAS box – specific details of which are available in the UK AIP ENR 2.2 available <a href="https://example.com/her



The following Design Principles have been developed to inform the airspace design process (CAP1616 Stage 1). We have identified you as a key stakeholder and we would welcome your feedback and/or suggested amendments to the proposed design principles. Priorities are indicated in brackets (A being the highest priority). These priorities will be considered when the design principles are used to evaluate/rank design options in the later stages of the airspace change process.

NATS NERL is the sponsor of this change, however the airspace will be operated DSNA and the IAA, using FRA principles.

DP0 Safety (A)

Maintain or enhance current levels of safety.

DP1 Operational (Resilience) (B)

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

DP2 Operational (Impact to Stakeholders) (A)

The proposed FRA airspace will be consistent with the airspace design requirements of DSNA Brest ACC.

DP3 Operational (Impact to Stakeholders) (A)

The proposed FRA airspace will be consistent with the airspace design requirements of IAA Shannon ACC.

DP4 Policy (PCP) (A)

The proposed FRA airspace will fulfil the requirements of the PCP.

DP5 Technical (MoD Requirements) (B)

The FRA airspace will be compatible with the requirements of the MoD and take into consideration the requirements of defence industry stakeholders.

DP6 Operational (Flexible Use Airspace) (B)

The proposed FRA airspace will be compatible with the Flexible Use Airspace (FUA) concept.



DP7 Operational (Adjacent ANSPs (NATS))

(B)

Connectivity to adjacent airspace (FRA or non-FRA) will be maintained or enhanced.

DP8 Operational (Impact to Stakeholders)

(B)

The proposed FRA airspace will be consistent with the requirements of airline operators and flight planning service providers.

Note: There is no Design Principle that specifically considers General Aviation because the airspace Class C, FL245 and above, and wholly over the sea.

If you are content with these Design Principles please respond "ACCEPT" or use the voting buttons.

We also welcome any comments or suggestions you may have.

Please respond before 7th August 2020.

Regards



Manager, Airspace Change Compliance & Delivery Directorate of Airspace & Future Operation

#### Hastening email to stakeholders who did not respond by 07/08/2020, sent 10/08/2020:

Dear colleagues,

We sent an email asking for a response on Design Principles, (copy below, sent 28 July).

Please respond to this email, this week if possible (by Fri 14 August), so we can complete the paperwork for the airspace change process Stage 1, to submit to our regulator the UK CAA.

Thank you in advance.

Best wishes



Senior Airspace Change Specialist

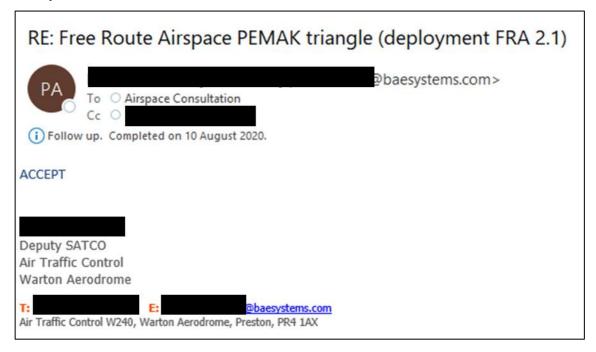
NATS Airspace & Future Operations

[Trail includes launch email, as above]



## Annex B: Engagement Activity - Stakeholder Responses (redacted emails)

BAE Systems:

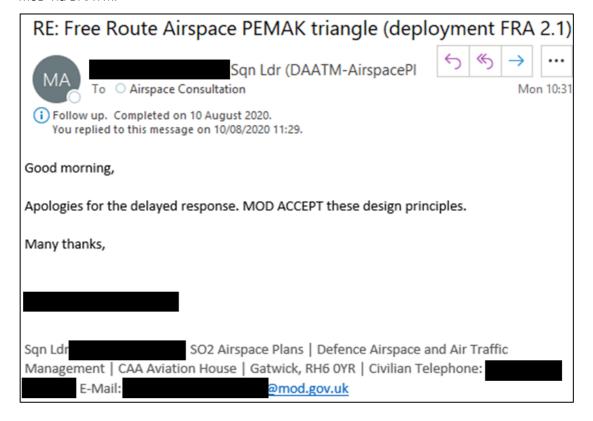


### British Gliding Association:

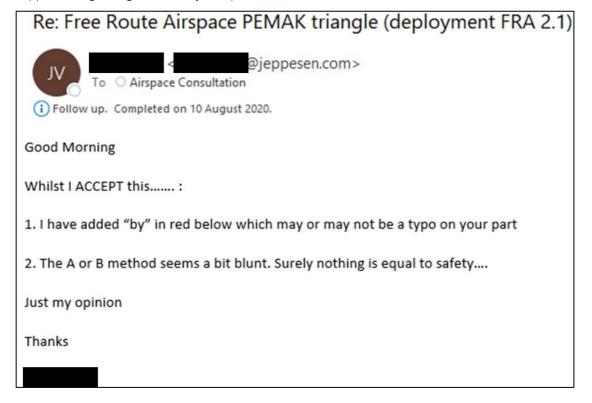




MoD via DAATM:

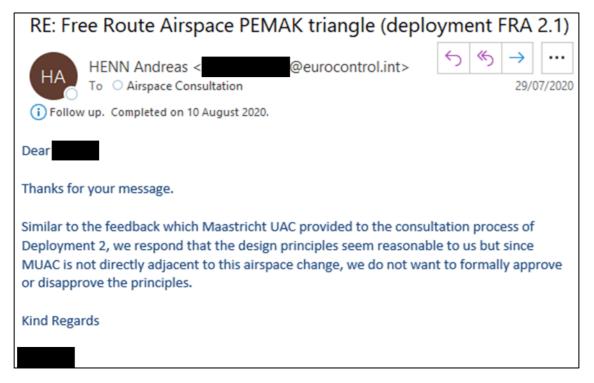


Jeppesen, regarding DPO Safety and priorities A and B:





#### **Eurocontrol MUAC:**

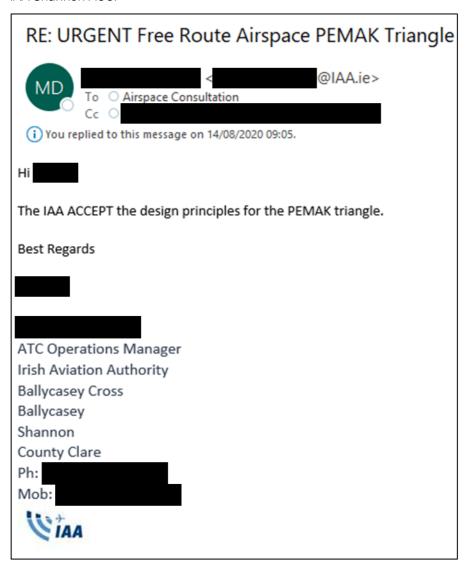


DSNA Airspace HQ and Brest ACC (counted as two responses):



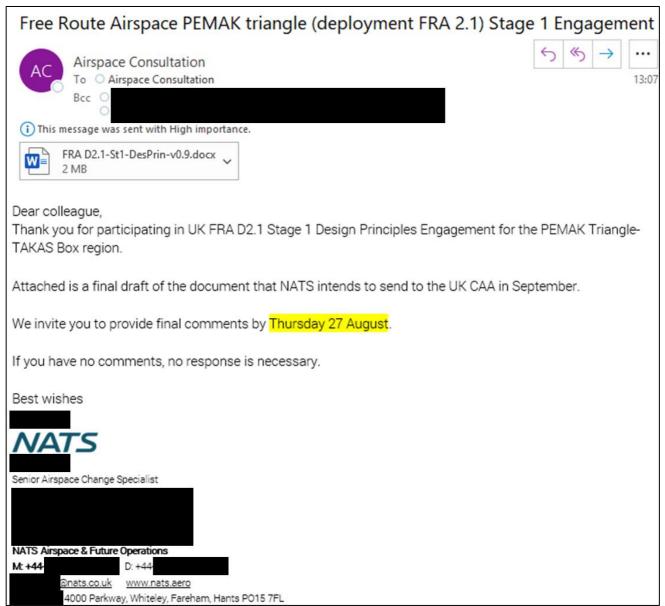


IAA Shannon ACC:





# Annex C: Engagement Activity - Confirmation of DPs (redacted email)



No further material comments were received.



## **Glossary of Terms**

ACP: Airspace Change Proposal

ANSP: Airspace Navigation Service Provider

ATC: Air Traffic Control

ATS: Air Traffic Services

**Borealis Alliance**: Alliance amongst north-west European Air Navigation Service Providers to drive better performance for stakeholders through business collaboration. The Alliance includes the ANSPs of Denmark, Estonia, Finland, Iceland, Ireland, Latvia, Norway, Sweden and the UK.

CAA: Civil Aviation Authority – UK Airspace regulator

CAP: Civil Aviation Publication

**CAP1616:** guidance on the regulatory process for changing airspace design including community engagement requirements. The UK's airspace change process, regulated by the CAA.

**DAATM:** Defence Airspace & Air Traffic Management, the Ministry of Defence's central coordination for airspace changes.

**DP, Design Principles:** these encompass the safety, environmental and operational criteria and the strategic policy objectives that the change sponsor seeks to achieve in developing the airspace change proposal.

**Eurocontrol**: European Organisation for the Safety of Air Navigation; with 41 members it seeks to achieve safe and seamless air traffic management across Europe. (note Eurocontrol is independent of the European Community)

**FRA:** Free Route Airspace - a specified volume of airspace in which users may freely plan a route between a defined entry and exit point. Subject to airspace availability, routeing is possible via intermediate waypoints, without reference to the air traffic service (ATS) route network. Inside this airspace, flights remain subject to air traffic control.

ICAO: International Civil Aviation Organisation – an agency of the United Nations.

**NATMAC:** National Air Traffic Management Advisory Committee - NATMAC is a non-statutory advisory body sponsored by the CAA. The Committee is consulted for advice and views on any major matter concerned with airspace management.

NATS: UK Air Navigation Service Provider

**RAD:** Route Availability Document - contains the policies, procedures and descriptions for route and traffic orientation. Includes route network and free route airspace utilisation rules and availability.

Statement of Need: sets out what airspace issue or opportunity this proposed change seeks to address

Systemised Airspace: Use of procedure-based methods used to manage aircraft rather than tactical control.

End of document