



Free Route Airspace Deployment 2.1

CAP1616 documentation:

Stage 3 Consult

Step 3D Collate and Review Responses

V1.0

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References

Ref No	Description	Hyperlinks
1	FRA D2.1 CAA web page – progress through CAP1616	Link
2	Stage 1 Assessment Meeting Minutes	Link
3	Stage 1 Design Principles	Link
4	Stage 2 Design Options	Link
5	Stage 2 Design Option Evaluation	Link
6	Stage 2 Initial Options Appraisal	Link
7	Stage 3 Consultation Strategy	Link
8	Stage 3 Options Appraisal	Link
9	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. It summarises all consultation responses in accordance with the “you said” stage of “We asked, you said, we did”.
- 1.2. This document aims to provide adequate evidence to satisfy:
Stage 3, Step 3D Categorisation of responses

2. Consultation Overview

- 2.1. NATS has completed a focused consultation on the proposed implementation of Free Route Airspace (FRA) across the volume of airspace in the south west corner of the UK UIR (Upper Information Region), known as the PEMAK Triangle and the TAKAS Box. The provision of Air Traffic Services (ATS) within this airspace is delegated to the Irish Aviation Authority (IAA) Area Control Centre (ACC) (TAKAS Box) and the Direction des Services de la Navigation Aérienne (DSNA) Brest ACC (PEMAK Triangle).
- 2.2. This area of airspace was separated from the main Deployment 2 ACP in order to meet other DSNA FRA deployment timelines. It has a target deployment date of 2nd December 2021.
- 2.3. This consultation is related to the proposed Deployment 2.1 airspace only.
- 2.4. The consultation strategy document (Ref 7) describes the focus of the consultation including previous engagement activities completed, the audience of the consultation and justification behind the consultation strategy.
- 2.5. A consultation document (Ref 9) was 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.
- 2.6. A targeted group of aviation stakeholders were specifically engaged for this consultation. A description of engagement activities and reasoning behind why these specific stakeholders were targeted can be found in the Consultation Strategy Document (Ref 7).
- 2.7. Although some stakeholders were specifically targeted, the consultation was not exclusive to this list. Any individual or organisation could submit a response; however, we only specifically targeted the organisations listed.
- 2.8. The stakeholders were sent a notification email to inform them when the consultation was launched. This included information on how to respond via the online portal and that the consultation document was available to download, along with other supporting documents, from the portal.
- 2.9. 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.
- 2.10. A list of the questions used in the online portal can be found in the Consultation Document (Ref 9).
- 2.11. 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.
- 2.12. The consultation commenced on 11th January 2021 and ended on 8th February 2021. Targeted stakeholders were contacted by email to inform them of the launch, which included a link to the online portal. Due to a technical issue, not all stakeholders received the email advising them of the launch. The consultation notification process was reviewed to capture those stakeholders that did not receive the initial email; this approach was endorsed by the CAA. Those who had not been contacted in the original email were notified on 20th January by email. These stakeholders were offered additional time to complete the consultation. No requests were made to extend the consultation. The consultation duration was 4 weeks.
- 2.13. Responses have been managed and uploaded to the portal by the CAA.
- 2.14. During the consultation, there were no responses which required any additional material or information.

- 2.15. Follow-up emails were sent to targeted stakeholders who had not submitted a response at the mid-point of the consultation, which included a link to the online consultation portal. This was adjusted for the group who did not receive the initial consultation launch email. A final reminder was sent to all stakeholders who had not responded with one week to the end of the consultation. This was to prompt stakeholders for a response and in line with the consultation strategy to encourage maximum participation.

3. Summary of Consultation Responses – FRA Options

- 3.1. A total of fourteen responses were received in the four-week consultation period. Thirteen of the responses were submitted via the online portal and one (British Gliding Association (BGA)) was emailed directly to the NATS Airspace Consultation mailbox, and manually entered onto the portal by the Sponsor.
- 3.2. The responses have been analysed and themed. The categorisation of responses has been split into those which may impact final proposals and those which would not. This is summarised later, in Section 4 of this document.
- 3.3. Responses were received from DSN Airspace HQ (France); DSN ACC Brest (France); Irish Aviation Authority (IAA); and Eurocontrol Network Manager.
- 3.4. A response was received from the Ministry of Defence (MoD).
- 3.5. A response was received from the French Civil Aviation Authority (Direction Generale de 'Aviation Civile)
- 3.6. Three responses were received from targeted NATMAC stakeholders: BGA, BALPA (British Airline Pilots Association) and GATCO (Guild of Air Traffic Controllers).
- 3.7. Three targeted airlines responded to the consultation – GulfAir, America Airlines and United Airlines. The additional airline stakeholders were all prompted for a response during the consultation, as described in Section 2 above.
- 3.8. A response was received from one CFSP, Jeppesen.
- 3.9. One individual responded with feedback to the consultation.
- 3.10. Two of the responses received were ambiguous as to option preference. Follow up engagement clarified the respondents view, which has been considered in the analysis.

Consultation Effectiveness

- 3.11. Given the number of responses, and that the Respondents represent a good sample of targeted stakeholders, we consider this to be a successful consultation.

Consultation Output

- 3.12. The online portal included focused questions on whether the respondents supported 2 specific options for the proposed changes. Stakeholders were asked to rank their response to the specific options – to what extent they agreed Option 1 was an acceptable solution, and to what extent they agreed Option 2 was an acceptable solution.
- 3.13. The deployment options which were consulted on were:
- 3.14. Option 1 - remove all ATS routes and rationalise waypoints in accordance with the DSN Brest ACC FRA design in both the PEMAK Triangle and TAKAS Box
- 3.15. Option 2 – remove all ATS routes and rationalise waypoints in accordance with the DSN Brest ACC FRA design in the PEMAK Triangle but retain ATS routes in the TAKAS Box
- 3.16. Figure 1 below provides a graphical representation of responses for the individual aspects:

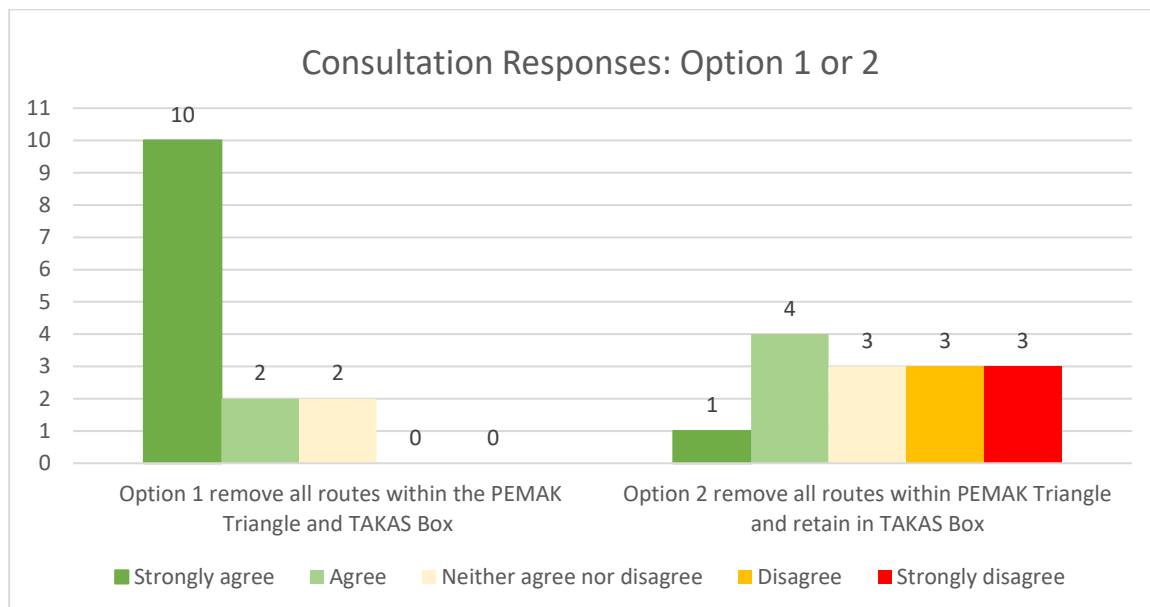


Figure 1 Consultation responses to Option preference questions (FRA D2.1 Options)

- 3.17. All respondents showed support for Option 1, with the biggest proportion (10 out of 14 respondents) expressing that they Strongly Agreed with this option. 2 respondents Agreed and there were 2 neutral responses received. There were 8 comments made which provided a rationale for the Support for Option 1. These are shown in Table 2 below.
- 3.18. For Option 2, 1 respondent Strongly Agreed with this option and 4 Agreed. 3 respondents were neutral, 3 respondents Disagreed, and 3 respondents Strongly Disagreed that this was an acceptable solution. No comments were made specific to Option 2.
- 3.19. Respondents were asked to express a preference for Option 1 or Option 2. As shown in Table 1 below, Option 1 was the preferred option for 11 respondents. 3 respondents indicated no preference.

Response ID	Organisation	Position Title	Do you prefer Option 1 or Option 2?
FRA_1	MoD	DAATM SO2 Airspace Operations	No preference
FRA_2	Individual	N/A	Option 1
FRA_3	DSNA Brest ACC	Brest Free Route ATC Lead	Option 1
FRA_4	BGA	Representative	No preference
FRA_5	EUROCONTROL	Senior Expert Airspace Design	Option 1
FRA_6	DSNA	Free Route Airspace Program Manager	Option 1
FRA_7	Gulf Air	Representative	Option 1
FRA_8	BALPA	Chairman, Air Traffic Services Study Group	Option 1
FRA_9	DGAC	Head of Office of Air Navigation	Option 1
FRA_10	IAA	Manager, Airspace & Navigation	Option 1
FRA_11	GATCO	Deputy President	No preference
FRA_12	Jeppesen UK Ltd	Navigation Database Specialist	Option 1
FRA_13	United Airlines	Regional Manager, Int'l ATC Operations	Option 1
FRA_14	American Airlines	ATM and Airfield Operations Manager	Option 1

Table 1: Option Preferences by Respondent

- 3.20. The online portal included a focused question where stakeholders were asked to rank their response to indicate to what extent they agreed with the proposed waypoint rationalisation. As shown in Figure 2, the responses were in support of this: 6 respondents indicated Strongly Agree, 5 respondents indicated Agree, and 3 respondents indicated no preference. No comments were received specific to this question.

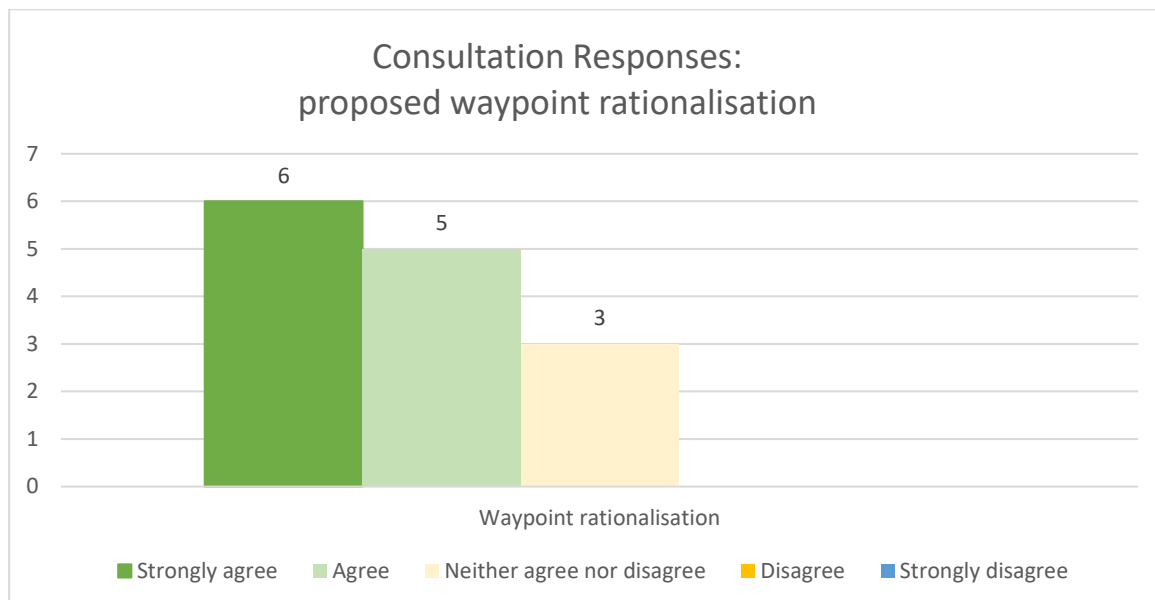


Figure 2 Responses to Waypoint Rationalisation

- 3.21. Stakeholders were asked to rank their response to indicate to what extent they agreed with the proposed method of adhering to the CAA Special Use Airspace – Safety Buffer Policy for Airspace Design Purposes. As shown in Figure 3, the responses were in support of this, 4 respondents indicated Strongly Agree, 8 respondents indicated Agree, and 2 respondents indicated no preference. No comments were made specific to this question.

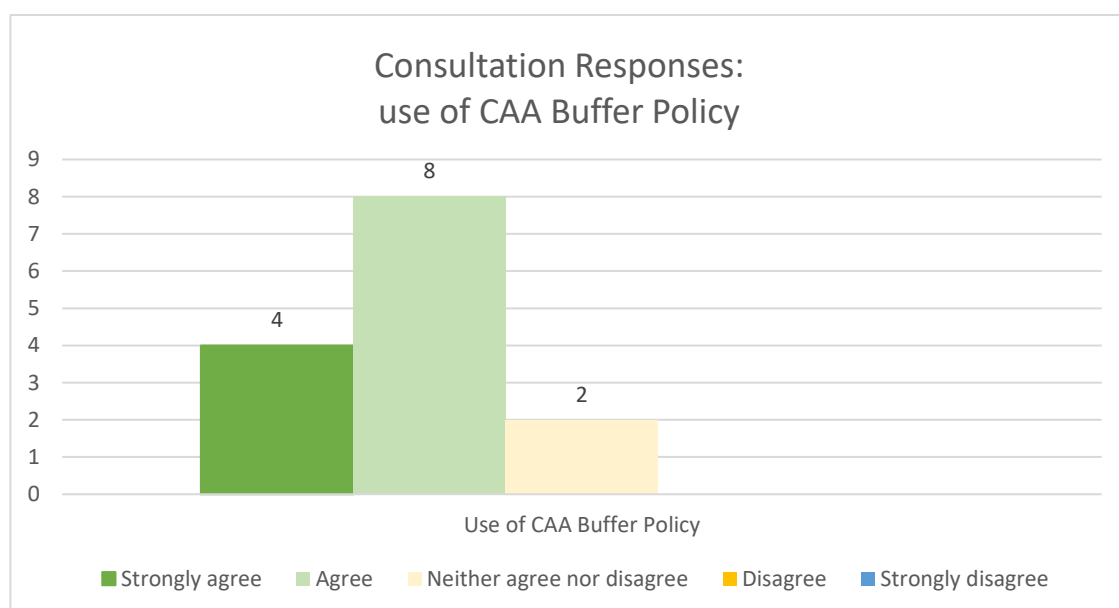


Figure 3 Responses to Use of CAA Buffer Policy

- 3.22. There were 12 comments received overall. These were comments on the overall proposal and not on the specific options. These have been reviewed and categorised.

4. Categorisation of Consultation Responses and Themes

- 4.1. The responses received have been reviewed and categorised.
- 4.2. There are no response elements which were identified as having a potential impact on the final proposed design.
- 4.3. 12 response elements are captured as not having an impact on the final proposed design; these are summarised in Table 2 below.
- 4.4. This consultation complies with the first part of CAP1616's "We asked, you said, we did" approach.

Responses which do not impact the final proposal

- 4.5. The following 12 responses do not contain any new information or suggestions that could lead to an adaptation in the final proposed design. Additional relevant feedback is captured, including any actions or considerations arising.

Response and ID	Summary	Themes of comment	Why the proposal is not impacted	Any relevant considerations / feedback
MoD (online portal) NATS ref: FRA_1	Neither impact MoD operations	General	No comments containing new information or suggestions	N/A
Individual (online portal) NATS ref: FRA_2	"I consider Option 1 to be the better proposal for the following reasons: Increased potential for fuel savings. Little purpose to use of routes in TAKAS box when those routes will not connect with onward routes in either the SOTA or in PEMAK triangle. The insertion of routes for a relatively short distance in the midst of a FRA area where no routes are published will be potentially confusing for Airspace Users."	Rationale for Support of Option 1	No comments containing new information or suggestions	N/A
Brest ACC (online portal) NATS ref: FRA_3	The presence of FRA and ATS Routes in the PEMAK Triangle will have negative side effects on Brest Flight Data processing system. It would prevent the automatic processing of some flights. The Routes in the PEMAK Triangle will be less efficient than the Free Route flight planning possibilities.	Rationale for Support of Option 1	No comments containing new information or suggestions	N/A
BGA (via email) NATS ref: FRA_4	Thanks for the engagement. This has no impact on gliding operations and therefore we have no comments.	General		N/A
EUROCONTROL (online portal) NATS ref: FRA_5	Option 1 is in line with EUROCONTROL FRA Design guidelines. It prevents a transition from FRA to fixed ATS routes and back to FRA again. Compared to Option 2, the following applies: less workload for ATC; less potential for confusion in the cockpit; less need for maintenance of airspace data; simplified checking of Flight Plans in NM; better for the environment. Option 1 is more efficient than Option 2.	Rationale for Support of Option 1	No comments containing new information or suggestions	N/A
DSNA (online portal) NATS ref: FRA_6	Option 1 offers more possibilities for airspace users to plan the most efficient	Rationale for Support of Option 1	No comments containing new	N/A

Response and ID	Summary	Themes of comment	Why the proposal is not impacted	Any relevant considerations / feedback
	route, and is consistent with Brest ACC (and DSNA) FRA CONOPS		information or suggestions	
BALPA (online portal) NATS ref: FRA_8	In practical terms, there is probably little difference between the proposals but for consistency throughout the UIR then Option 1 is preferable. But these Free routings are very welcome for flight planning and reduces pilot workload as 'waypoint clutter' reduces.	Rationale for Support of Option 1	No comments containing new information or suggestions	N/A
DGAC (online portal) NATS ref: FRA_9	The wide analysis enclosed to the consultation shows that option 1 supports full deployment of FRA, allowing operational benefits, accommodates provision of ATS within the airspace addressed and takes into account safety objectives.	Rationale for Support of Option 1	No comments containing new information or suggestions	N/A
IAA (online portal) NATS ref: FRA_10	Reflects ongoing discussion between NATS, IAA (ANSP) and DSNA to provide airspace and operational ATS requirements that meet the DSNA FRA implementation and provide best use of the delegated airspace. Best represents the (CAA) ACP process being managed by NATS. Airspace concerned is at periphery of SOTA airspace controlled by IAA; anticipated to have no material negative impact for AOs. Process seen as solid first step in managing the Shannon UIR (SOTA), DSNA and NATS airspace in this geographical area to support future FRA development, cross border, which best meets operational ATS and AO preferential routings. In my role as IAA ANSP Manager Airspace and Navigation, I have been involved in discussions with the NATS and DSNA teams and recognise that the proposed option is the best solution for integration of this delegated airspace with the Shannon UIR FRA and the introduction of the Brest area FRA	Rationale for Support of Option 1 Comments on ACP process and ongoing engagement	No comments containing new information or suggestions	N/A
GATCO (online portal) NATS ref: FRA_11	GATCO believes that neither scheme will have an impact on operations for UK controllers, as the airspace is wholly delegated to other agencies.	General	No comments containing new information or suggestions	N/A
Jeppesen UK Ltd (online portal) NATS ref: FRA_12	In my view Option 2 does not offer FRA within the TAKAS box. I feel the consultation is lacking any opinion or statement from Brest. Maybe I'm missing something.	Rationale for Support of Option 1 Comments on ACP process	No comments containing new information or suggestions	Email sent to Jeppesen to clarify NATS is sponsor, with engagement with Brest ACC
United Airlines	United Airlines welcomes the initiative.	General	No comments containing new information or suggestions	

5. Conclusion and Next Steps

- 5.1. The current proposed design for Option 1 (fully remove ATS routes within the TAKAS Box and PEMAK Triangle) is fully supported in the consultation responses. The proposed waypoint rationalisation and proposed method of applying the requirements to the CAA Buffer Policy for Special Use Airspace is also supported by our key stakeholders. As such, there is no requirement to review or amend the final design.
- 5.2. Therefore, the Option 1 design proposed in the consultation will be progressed through Step 4A (in accordance with you said, we did") to Step 4B.
- 5.3. We will consider additional refinements and technical amendments which have come to light as part of NATS' policy of continually seeking airspace improvement.
- 5.4. The next step will be to write and publish the formal Step 4A Update Design & Step 4B Airspace Change Proposal for Option 1 and submit this to the CAA.

6. Reversion Statement

- 6.1. Should the proposal be approved and implemented, depending on the Option implemented, reversion to the pre-implementation state would be:
 - **FRA Option 1** (in which all ATS routes are removed) – **Complex and very difficult**
 - **FRA Option 2** (in which the ATS route structure is partially maintained) – **Complex and very difficult**
- 6.2. Due to the removal of ATS Routes the changes proposed by Option 1 and 2 would permanently and significantly change the airspace structure, hence making reversion complex and extremely difficult.
- 6.3. 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 only implemented four times a year.

End of document