

## CAA Consultation Assessment

<b>Title of airspace change proposal</b>	Swanwick Airspace Improvement Programme Airspace Deployment 4 (SAIP AD 4)
<b>Change Sponsor</b>	NATS
<b>Project Reference</b>	ACP-2017-58
<b>SARG Lead</b>	██████████
<i>Case study commencement date</i>	05/07/2018
<i>Case study report as at</i>	03/08/2018
<p><i>Instructions</i></p> <p>In providing a response for each question, please ensure that the 'status' column is completed using the following options:</p> <ul style="list-style-type: none"><li>• yes</li><li>• no</li><li>• partially</li><li>• n/a</li></ul> <p>To aid the SARG project leader's efficient project management it may be useful that each question is also highlighted accordingly to illustrate what is:</p> <p>resolved <span style="background-color: green; color: white; padding: 2px;">Green</span></p> <p>not resolved <span style="background-color: orange; color: white; padding: 2px;">Amber</span></p> <p>not compliant <span style="background-color: red; color: white; padding: 2px;">Red</span></p>	
<b>Executive Summary</b>	
<p>NATS' Swanwick Airspace Improvement Programme (SAIP) is proposing several modular airspace changes within the London Flight Information Region (FIR), managed by NATS Swanwick. It aims to modernise each region through airspace deployments (AD).</p> <p>SAIP AD4, proposes the development and systemisation of westbound air traffic service (ATS) routes in the Clacton Sector. This region is known by LVNL (Dutch ANSP), MUAC (Maastricht Upper Airspace Control Centre) and NATS as the 'REFSO box' and is a volume of airspace in the Dutch FIR where the air traffic service is delegated to NATS.</p> <p>The consultation on this airspace change sought feedback on a proposal to alter the westbound traffic flows from Maastricht Delta Sector. The consultation also wanted feedback on the proposal to alter some eastbound flows, from NATS towards MUAC, to partially offset</p>	

potential fuel dis-benefit due to the westbound systemisation.

The consultation took place over a four-week period (2 – 30 May 2018), which was considered proportionate to the scale of the change (Level 2A) and acknowledged the volume of engagement that had been undertaken up to that point. This included various engagement activities with potentially impacted stakeholders (led by NATS) prior to and during Stage 1 and 2 of the CAP 1616 airspace change process – which was evidenced at the relevant Gateways. This prior engagement meant that consultees were responding from an informed position. The stakeholders targeted for response from this consultation were aviation specialists; therefore, associated consultation material contained technical aviation language which is considered audience appropriate.

The 2017 GORLO waypoint data was used to inform which airlines were targeted for a response to this consultation. Stakeholders were directly contacted by email to participate in the consultation, with reminder emails sent to those who hadn't responded before the consultation closed. The consultation was prepared using the CAAs preferred online consultation platform Citizen Space, a channel which is accessible to the stakeholders targeted in this consultation.

The option taken forward to consultation was developed through stakeholder engagement and meets the design principles agreed in Stage 1. Rationale for the proposed changes was outlined within previous engagement activity and the consultation material, which included the need to meet the changes being put forward by Maastricht ANSP.

## PART A – Summary of Airspace Change Process to date

A.1	<p><i>All materials relating to this Airspace Change Proposal can be found at the following link:</i>  <a href="http://www.caa.co.uk/Commercial-industry/Airspace/Airspace-change/Decisions-from-2018/Swanwick-Airspace-Improvement-Programme-Airspace-Deployment-4/">http://www.caa.co.uk/Commercial-industry/Airspace/Airspace-change/Decisions-from-2018/Swanwick-Airspace-Improvement-Programme-Airspace-Deployment-4/</a></p>	
A.2	<b>Stage 1 DEFINE Gateway</b>	<b>26/01/2018</b>
A.2.1	The Define Gateway Assessment was undertaken on 26 January 2018 and the CAA was satisfied that the change sponsor had met the requirements of the Process up to that point. The CAA gave approval for the Change Sponsor to progress to the next Step.	
A.3	<b>Stage 2 DEVELOP &amp; ASSESS Gateway</b>	<b>23/02/2018</b>
A.3.1	The CAA completed the Develop and Assess Gateway Assessment on 23 February 2018 and was satisfied that the change sponsor had met the requirements of the Process up to that point. The CAA gave approval progress to the next Step.	

<b>A.4</b>	<b>Stage 3 CONSULT Gateway</b>	<b>27/04/2018</b>
A.4.1	The CAA verified that the consultation documents addressed all the reasonable requirements of the consultees, that the strategy to communicate with them was sufficient and appropriate.	
A.4.2	The CAA completed the Consult Gateway Assessment for SAIP AD4 on 27 April 2018 and was satisfied that the change sponsor had met the requirements of the Process up to that point. The CAA approved progress to the next Step.	
A.4.3	The CAA accepted that the categorisation of consultation responses had been done fairly (02/05/2018)	
<b>A.5</b>	<b>Stage 4 UPDATE &amp; SUBMIT</b>	<b>18/06/2018</b>
A.5.1	<p>At Stage 4, the change sponsor modified their proposal to reflect feedback given in consultation responses, and made a formal submission of the proposal to the CAA.</p> <p>Out of the 14 responses received from this consultation, three of those were identified as having the potential to impact final proposed designs, which were put forward by EasyJet and KLM Royal Dutch Airlines. Two suggestions were taken forward, one from each organisation leading to an adaptation on the final proposal being submitted.</p>	
<b>PART B – Consultation Assessment</b>		
<b>B.1</b>	<b>AUDIENCE</b>	
<b>B.1.1</b>	<b>Did the consultation target the right audience?</b>	<b>Yes</b>
	<p>At Stage 3 of CAP1616 process the change sponsor is required to submit a consultation strategy to the AA, along with consultation materials.</p> <p>This strategy summarised the engagement activity which had been carried out up to that point, and contained specific sections on audience, approach, materials and length.</p> <p>Within the audience section there is clear rationale provided for both the stakeholders listed for a targeted response (those impacted by the proposed changed), as well as those not targeted for response to the consultation who will not be impacted by the change (e.g. General Aviation and airport operators).</p> <p>The Maastricht (MAAS) and Dutch (LVNL) ANSPs were considered partners in the airspace change proposal and were</p>	

	<p>targeted for feedback.</p> <p>Responses were sought from a list of stakeholders outlined in their <a href="#">Consultation Strategy – Annex A</a>. This list included targeting airlines, neighbouring ANSPs, and the MoD through the Defence Airspace and Air Traffic Management (DAATAM).</p> <p>The following nine airlines were actively targeted for a response and were considered primary stakeholders:</p> <p>British Airways, Ryanair, Wizz Air, EasyJet, KLM Royal Dutch Airlines, Flybe, Norwegian Air Shuttle, BA City Flyer (a subsidiary of British Airways), Scandinavian Airlines</p> <p>This is because combined, their flights account for c. 70% of flightplans using waypoint GORLO and are therefore most likely to be impacted by the change.</p> <p>A further twelve airlines were contacted to respond to the consultation who fly less frequently using waypoint GORLO to address the remaining 30%.</p> <p>The consultation was also promoted, with links to Citizen Space, on the NATS Customer Affairs website (largely aimed at airlines) and their public facing website – meaning the public or any organisation could respond.</p> <p>The CAA is satisfied that the consultation targeted the right audience based on the impact of the change and accepts the data source and rationale provided by the change sponsor.</p>	
<b>B.1.2</b>	<b>Please provide a summary of responses below</b>	
	<p>NATS received 14 responses to the consultation.</p> <p>Out of the nine airlines targeted, six responded to the consultation which equates to a 67% response rate from primary stakeholders.</p> <p>Questions on the proposal were split into five elements, broadly categorised as:</p> <ol style="list-style-type: none"> <li>1. Use of RNAV1</li> <li>2. Traffic flows</li> <li>3. Westbound changes</li> </ol>	

	<p>4. Eastbound changes 5. Route level restrictions</p> <p>The first four elements were largely supported by respondents, with the fifth element showing more neutral responses.</p> <p>Some airlines did flag that the proposed eastbound improvements did not fully offset the westbound dis-benefit.</p> <p>The MOD responded with no objections through DAATM, and are considered a mandatory stakeholder.</p> <p>One member of the public responded to the consultation raising concerns about this proposal having an impact on noise on the ground and commented that the consultation should therefore have targeted a public audience. This is a Level 2A airspace change, changes are above 7000ft meaning that noise is not a priority for consideration (in line with the Government's Air Navigation Guidance).</p>
<b>B.2</b>	<b>APPROACH</b>
<b>B.2.1</b>	<p><b>Did the change sponsor consult stakeholders in a suitable way?</b></p>
	<p>Stakeholders were consulted in a suitable way. Both primary and secondary stakeholders were involved in engagement prior to the consultation and were therefore aware of the proposed changes and the drivers for these, with the majority going on to respond to the consultation from an informed position.</p> <p>Before the consultation was launched, the change sponsor contacted a set stakeholders via email (outlined in <a href="#">Annex A of their Consultation Strategy</a>) encouraging them to respond to the consultation when it launched. An email was sent at the beginning the consultation period (launch), and again half way through to remind stakeholders to submit feedback.</p> <p>The consultation was made available on Citizen Space – the CAAs preferred online consultation platform.</p> <p>This approach is suitable as the stakeholders for this consultation were classified as aviation stakeholders, who largely have access to the internet.</p> <p>Postal responses were also accepted, although none were submitted.</p>
<b>B.2.2</b>	<p><b>What steps did the change sponsor take to encourage stakeholders to engage in the consultation?</b></p>

Yes

	<p>The change sponsor sent out an email to targeted stakeholders prior to the consultation launching, as well as an email to inform them that the consultation was live. These emails included information on how to respond to the consultation via Citizen Space as well as the attaching the consultation document for completeness.</p> <p>Throughout the duration of the consultation emails were sent to those stakeholders who had not responded to encourage them to do so.</p>
<b>B.2.3</b>	<p><b>Was the change sponsor required to respond to any unexpected events and/or challenges?</b></p>
	<p>No.</p>
<b>B.3</b>	<p><b>MATERIALS</b></p>
<b>B.3.1</b>	<p><b>What materials were used by the change sponsor during the consultation?</b></p>
	<p>NATS produced a consultation document that was available to download from Citizen Space, which outlined the proposed changes. The document covered:</p> <ul style="list-style-type: none"> <li>▪ An introduction (outlining the CAP1616 airspace change process, the purpose of the consultation)</li> <li>▪ An overview (sections covering the stakeholders targeted for response to the consultation and the rationale for the selection, summary of engagement activities to date)</li> <li>▪ Current airspace including UK-Dutch FIR Interface, current westbound routes, current usage</li> <li>▪ Proposed changes (westbound, eastbound), other changes separate from their proposal (DVOR rationalisation), dependencies (Maastricht ANSPs implementation of free route airspace on 6 December 2018)</li> <li>▪ Benefits and impacts of the proposal (capacity benefit, noise, fuel and CO2 (WebTAG), and finally a section on proposed route usage by traffic flow</li> <li>▪ Consultation participation (how to respond and a section covering what happens with the responses)</li> </ul> <p>This document was embedded in the consultation pages on Citizen Space and was available for download. It was also emailed directly to targeted stakeholders.</p> <p>For the nine key airlines targeted, this consultation document was tailored around the environmental element of the proposal. They received the standard environmental analysis, supplemented with an individual estimate of the predicted fuel charge per flight. As this information is commercially sensitive for each operator, this information was not made public.</p> <p>The consultation was also made available through NATS Customer Affairs website as well as their public facing website.</p> <p>Technical aviation language was used in the materials, which is considered appropriate for the intended target audience.</p>

<b>B.3.2</b>	<b>Did the materials provide stakeholders with enough information to ensure that they understood the issue(s) and potential impact(s) on them?</b>	<b>Yes</b>
	<p>Yes.</p> <p>There were detailed sections around the current airspace and the proposed changes, as well as clearly outlining the dependencies on this proposal (Maastricht ANSPs implementation of Free Route Airspace on 6 December 2018).</p> <p>Fuel dis-benefits around westbound routes were outlined within the material and the nine key targeted airlines received individual estimates of the predicted fuel charge per flight.</p> <p>The preferred option (Option 3) highlighted that although there was an overall fuel dis-benefit, the conflict analysis showed that there would be an overall improvement in the number of conflicts and therefore reduce air traffic control complexity – which is generally seen as a benefit to safety.</p>	
<b>B.4</b>	<b>LENGTH</b>	
<b>B.4.1</b>	<b>Please confirm the start/end dates and the duration of the consultation below</b>	
	The consultation ran from 2 May 2018 – 30 May 2018 – for a period of 4 weeks.	
<b>B.4.2</b>	<b>Was the period of consultation proportionate?</b>	<b>Yes</b>
	The consultation period was considered proportionate to the scale of the change, and NATS had undertaken engagement activities with impacted stakeholders prior to the consultation (which was evidenced at the initial assessment meeting and relevant gateways) – therefore stakeholders were responding from an informed position.	
<b>B.4.3</b>	<b>If duration was less than 12 weeks, what was the justification?</b>	
	<p>NATS had undertaken significant stakeholder engagement activities prior to the consultation, including face to face briefings with the airlines who are most likely to be affected by the proposed changes. NATS also presented at the NATS Operational Partnership Agreement and the Flight Efficiency Partnership forums.</p> <p>The four-week consultation period was considered sufficient due to the levels of prior engagement undertaken</p>	

	with key impacted stakeholders. The timeline for this airspace change proposal is also dependent on the operational constraints of the Maastricht ANSPs implementation of free route airspace (on 6 December 2018).	
<b>PART C</b>	<b>General</b>	
<b>C.1</b>	<b>Was the conduct of the consultation aligned with the consultation strategy?</b>	<b>Yes</b>
	<p>Having undertaken a comparison between the consultation strategy, which was approved by the CAA at the Consult Gateway on 27 April 2018, and the approach undertaken by NATS to execute the strategy, I am satisfied that the conduct of the consultation aligned with the consultation strategy.</p> <p>NATS placed links to the consultation on the NATS customer website, as well as their public facing website. Responses were sought via email from a list of stakeholders outlined in their <a href="#">Consultation Strategy – Annex A</a>.</p>	
<b>C.2</b>	<b>Has the change sponsor categorised the responses in accordance with CAP 1616?</b>	<b>Yes</b>
	<p>Yes. NATS has produced a standalone document specifically outlining their methodology for categorising responses which is fully aligned to the guidance set out in CAP 1616.</p> <p><a href="http://publicapps.caa.co.uk/modalapplication.aspx?appid=11&amp;mode=detail&amp;id=8511">http://publicapps.caa.co.uk/modalapplication.aspx?appid=11&amp;mode=detail&amp;id=8511</a></p> <p>Within this document there were three consultation responses which were identified as having the potential to impact the final designs proposed – two out of these three went on to impact the final proposal, these suggestions were put forward by EasyJet and KLM Royal Dutch airlines – who are considered key stakeholders to this proposal.</p> <p>Those responses that did not impact the final proposal were categorised (by themes in content e.g. traffic flows, westbound, eastbound etc.) and clear reasons were provided why any suggestions or comments were not taken forward.</p>	
<b>C.3</b>	<b>Has the change sponsor correctly identified all the issues raised during the consultation?</b>	
	<p>Yes.</p> <p>The change sponsor has provided responses to all consultees and made these available on Citizen Space and through their Stage 3 documentation.</p> <p>The main issues raised during the consultation were by airlines around the proposed eastbound improvements</p>	

	<p>which did not fully offset the westbound dis-benefit.</p> <p>In the documentation submitted in Step 4A 'Update and Submit' the change sponsor has shown how it has taken forward feedback from easyJet (around routing along the central flow to reduce track mile dis-benefit) and KLM Royal Dutch Airlines (around improving connectivity of eastbound flow structure, improving track mileage) which influenced the final designs submitted.</p>	
<b>C.4</b>	<b>Does the consultation feedback report accurately capture all the issues raised during the consultation?</b>	<b>Yes</b>
	<p>Yes.</p> <p>Having crossed referenced the raw response data from Citizen Space against the change sponsors feedback report (<a href="#">Step 3D Collate and Review Responses</a>) I am satisfied that the document accurately captures the issued raised during the consultation.</p>	
<b>C.5</b>	<b>Does the consultation feedback report detail the change sponsor's response to the identified issues?</b>	<b>Yes</b>
	<p>Yes.</p> <p>The change sponsors responses to feedback are set out in a table with clear rationale provided for not taking forward any suggested changes to be considered in the proposal.</p> <p>Feedback around the track mile dis-benefit was also taken into account and taken forward to the final proposal.</p>	
<b>C.6</b>	<b>Is the change sponsor's response to the issues raised appropriate/adequate?</b>	<b>Yes</b>
	Yes, in line with the guidance set out in CAP1616.	
<b>C.7</b>	<b>Is the formal airspace change proposal aligned with the conclusions of the consultation feedback report?</b>	<b>Yes</b>
	<p>Yes.</p> <p>NATS has included a design change log in their 'Update and Submit' documentation for Step 4A which includes how responses</p>	

	from the consultation that were categorised as having the potential to impact final designs have gone on to influence the final proposal.		
<b>C.8</b>	<b>Outstanding issues (to be resolved by change sponsor)</b>		
	<b>Serial</b>	<b>Issue</b>	<b>Action required</b>
	N/A	N/A	N/A
<b>C.9</b>	<b>Additional compliance requirements (to be satisfied by change sponsor)</b>		
	<b>Serial</b>	<b>Requirement</b>	
	N/A	N/A	
<b>PART D – Consultation Assessment Conclusion(s)</b>			
<b>D.1</b>	<b>Does the consultation meet the CAA’s regulatory requirements, the Government’s guidance principles for consultation and the Secretary of State’s Air Navigation Guidance?</b>		
<p>The consultation meets the CAA’s regulatory requirements outlined in CAP1616 process.</p> <p>Considering consultation Gunning Principles, I am satisfied that the consultation occurred when proposals were at a formative stage. The material used for the consultation gave clear reasons why the proposal should be given consideration – including fuel and CO2 analysis, with tailored fuel charge analysis provided to nine key impacted airlines. When considering the scale of the change, the consultation allowed adequate time for response, and the prior engagement work meant that stakeholders were adequately informed about the proposed changes before the consultation launched. The product of the consultation has been considered, this is evident in the fact that final designs were influenced by the consultation feedback given by two key stakeholders.</p> <p>The consultation targeted the right audience (using flightplan data from waypoint GORLO), it was communicated to stakeholders in a way that suited them, with the right level of information made available on an accessible platform - allowing for valuable contributions to the proposals development.</p>			

The consultation met the requirements of the Air Navigation Guidance.

	Name	Signature	Date
Consultation assessment completed by (Airspace Regulator – Communities & Coordination))	[REDACTED]	[REDACTED]	03/08/2018
Consultation assessment approved by (Head Airspace Regulation)	[REDACTED]	[REDACTED]	16/08/2018

**PART F – Group Director Safety and Airspace Regulation – Comment/Approval**

Name:	Signature	Date
[REDACTED]		20/08/2018