

## CAA Consultation Assessment

Title of airspace change proposal	Removal of EGSS LYD 6R/5S SIDs
Change Sponsor	NATS En-Route Ltd (NERL)
Project Reference	ACP-2020-066
SARG Lead	[REDACTED]
Case study commencement date	3 <sup>rd</sup> March 2021
Case study report as at	8 <sup>th</sup> March 2021
<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 Lead it may be useful that each question is also highlighted accordingly to illustrate what is:</p> <p>resolved <span style="background-color: #90EE90;">YES</span> not resolved <span style="background-color: #FFD700;">PARTIALLY</span> not compliant <span style="background-color: #FF6347;">NO</span></p>	
<p><b>Executive Summary</b></p> <p>NATS En-Route Limited (NERL) is in the process of rationalising its Doppler Very High Frequency Omnidirectional Range (DVOR) navigation beacons. Whilst maintaining or improving safety, this programme aims to reduce costs and the dependency on ground-based navigation aids (NavAids) by decommissioning and removing ageing superfluous DVORs. This program will also remove any existing dependency on these NavAids from any current en-route procedures e.g. Standard Terminal Arrival Routes (STARs).</p> <p>The LYD DVOR was selected to be removed from the network of ground-based NavAids and a separate airspace change proposal was progressed to remove the en-route dependencies; this was approved in October 2018. This proposal specifically concerns the removal of the airport instrument flight procedure (IFP) dependencies associated with Stansted airport, that is specifically the LYD 6R/5S Standard Instrument Departure (SID) procedures.</p> <p>This airspace change proposal seeks the extension of Air Traffic Service (ATS) route M604 from the DET DVOR to LYD. This would replace the final segment of the LYD 6R/5S SIDs and would allow the removal of these IFPs. Aircraft will fly the DET 1R/1S SID, which follows the same track to the DET DVOR. From the DET DVOR, aircraft will follow the extended ATS route M604 to LYD. The change sponsor has stated that this is a technical flight planning change and that it will not have any impact on aircraft tracks over the ground.</p>	

A rationale for a scaled consultation was submitted and accepted at the CONSULT Gateway. The consultation took place over a 2-week period (30<sup>th</sup> November 2020 to 14<sup>th</sup> December 2020) and targeted representatives from Stansted airport, the airport's Consultative Committee, Environmental Issues Group (EIG), Flight Operations Performance and Safety Committee (FLOPSC) and relevant members of the National Air Traffic Management Advisory Committee (NATMAC). Responses were received from Manchester Airports Group (the owner of Stansted airport) and the Airport Consultative Committee (which includes local community representatives); both confirmed their support for the airspace change proposal.

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

A.1	<a href="https://airspacechange.caa.co.uk/PublicProposalArea?pID=299">https://airspacechange.caa.co.uk/PublicProposalArea?pID=299</a>	
<b>A.2</b>	<b>Stage 1 DEFINE Gateway</b>	<b>30/10/2020</b>
A.2.1	The required documentation was presented on time and we were satisfied that the change sponsor had met the requirements of the Process up to that point. Progress to the next Step of the Process was therefore approved.	
<b>A.3</b>	<b>Stage 2 DEVELOP &amp; ASSESS Gateway</b>	<b>27/11/2020</b>
A.2.1	The required documentation was presented on time and we were satisfied that the change sponsor had met the requirements of the Process up to that point. Progress to the next Step of the Process was therefore approved.	
<b>A.3</b>	<b>Stage 3 CONSULT Gateway</b>	<b>27/11/2020</b>
A.3.2	The required documentation was presented on time and we were satisfied that the change sponsor had met the requirements of the Process up to that point. Progress to the next Step of the Process was therefore approved.	
<b>A.4</b>	<b>Stage 4 UPDATE &amp; SUBMIT</b>	<b>08/02/2021</b>
A.4.1	The change sponsor formally submitted their proposal, which included all the required documentation.	

#### PART B – Consultation Assessment

<b>B.1</b>	<b>AUDIENCE</b>	
<b>B.1.1</b>	<b>Did the consultation target the right audience?</b>	<b>YES</b>
	The consultation targeted representatives from Stansted airport, SACC, EIG and FLOPSC; these groups cover Stansted's main stakeholders, including local community representatives and airlines who operate from the airport. The change sponsor also targeted relevant members of the NATMAC. As we had accepted that there would be no discernible impact at ground level, it was perfectly reasonable for the change sponsor to target stakeholders at the representative level for this consultation.	

<b>B.1.2</b>	<b>Please provide a summary of responses below</b>	
	Responses were received from Manchester Airports Group (the owners of Stansted airport) and the SACC; both confirmed that they supported the airspace change proposal.	
<b>B.2</b>	<b>APPROACH</b>	
<b>B.2.1</b>	<b>Did the change sponsor consult stakeholders in a suitable way?</b>	<b>YES</b>
	The change sponsor utilised the CAA's airspace change <a href="#">Citizen Space consultation hub</a> to consult with stakeholders (via the Airspace Change Portal) and consequently their approach was aligned with the requirements of CAP 1616.	
<b>B.2.2</b>	<b>What steps did the change sponsor take to encourage stakeholders to engage in the consultation?</b>	
	<p>Details of the airspace change proposal were shared with the airport's Noise and Track Keeping Working Group (NTKWG) on the 22<sup>nd</sup> October and they were briefed on the planned consultation ahead of its launch. Reminder emails were distributed to advise stakeholders of the deadline date as follows:</p> <ul style="list-style-type: none"> <li>• 7<sup>th</sup> December – relevant NATMAC members</li> <li>• 8<sup>th</sup> December – Stansted airport, SACC, EIG and FLOPSC</li> </ul> <p>Although it was a targeted consultation, all of the documentation was made available in the public domain via the CAA's Airspace Change Portal and the NATS website (<a href="http://www.nats.aero">www.nats.aero</a>).</p>	
<b>B.2.3</b>	<b>Was the change sponsor required to respond to any unexpected events and/or challenges?</b>	<b>NO</b>
	N/A.	
<b>B.3</b>	<b>MATERIALS</b>	
<b>B.3.1</b>	<b>What materials were used by the change sponsor during the consultation?</b>	
	<p>As detailed above, the change sponsor utilised the CAA's airspace change Citizen Space webpage to create an associated <a href="#">consultation webpage</a>. The webpage provided an introductory 3-minute video which offered useful context and a clear narrative on the airspace change proposal, why NATS was consulting and next steps. A single chart was embedded on the webpage to highlight the scope of the proposal, along with the 12-page consultation document. The consultation document itself included the following sections:</p> <ul style="list-style-type: none"> <li>• Executive Summary</li> <li>• Introduction</li> <li>• Engagement activities completed to date</li> <li>• Current Airspace</li> </ul>	

	<ul style="list-style-type: none"> <li>• Proposed Airspace</li> <li>• Environmental Impacts</li> <li>• Consultation Timeframe</li> <li>• Consultation Participation</li> <li>• Reversion Statement</li> <li>• Next Steps</li> </ul> <p>Related links were provided on the webpage for stakeholders to find out more information about NATS and their intentions to create a sustainable future for aviation, the CAP 1616 airspace change process and other relevant airspace change proposals on the Airspace Change Portal.</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>
	The change sponsor clearly articulated the need for airspace change and the scope of their proposal. They also provided a good level of information using narrative, charts and graphics to help stakeholders understand the current and proposed airspace arrangements, the evolution of the proposal and their rationale for determining that there would be no impact to stakeholders, both on the ground and other airspace users.	
<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>	
	Start Date: 30 <sup>th</sup> November 2020 End Date: 14 <sup>th</sup> December 2020 Duration: 2-weeks	
<b>B.4.2</b>	<b>If duration was less than 12 weeks, what was the justification?</b>	
	The change sponsor cited the impact to stakeholders being minimal and the simplicity of the proposal as reasons for pursuing a reduced consultation period. They also acknowledged that the reduced consultation period would support them achieving their targeted implementation date (9 <sup>th</sup> September 2021 – AIRAC 09/2021). Although not specifically cited by the change sponsor as a reason for pursuing a reduced consultation period, it's worth noting that the engagement undertaken throughout the early stages of the airspace change process confirmed that the proposal was well supported.	
<b>B.4.3</b>	<b>Was the period of consultation proportionate?</b>	<b>YES</b>
	The reduced consultation period of 2-weeks was both proportionate and fully justified.	

B.5	GENERAL	
<b>B.5.1</b>	<b>Was the conduct of the consultation aligned with the consultation strategy?</b>	YES
	The delivery of the consultation was aligned with the consultation strategy.	
<b>B.5.2</b>	<b>Has the change sponsor categorised the responses in accordance with CAP 1616?</b>	YES
	Of the two responses received, both were deemed as being 'responses which do not impact the final proposal'. The change sponsor fairly and accurately determined that they contained no new information or ideas that could lead to an adaption in a lead design option or a new design option.	
<b>B.5.3</b>	<b>Has the change sponsor correctly identified all the issues raised during the consultation and accurately captured them in the consultation response document?</b>	N/A
	Of the two responses received, both confirmed their support for the airspace change proposal. Neither response raised an issue for the change sponsor to acknowledge and address in their consultation response document.	
<b>B.5.4</b>	<b>Does the consultation response document detail the change sponsor's response to the identified issues?</b>	N/A
	N/A.	
<b>B.5.5</b>	<b>Is the change sponsor's response to the issues raised appropriate/adequate?</b>	N/A
	N/A.	
<b>B.5.6</b>	<b>Is the formal airspace change proposal aligned with the conclusions of the consultation response document?</b>	YES
	The consultation response document confirms that no responses were received objecting to the airspace change proposal and/or suggesting that modifications were required. This status is reflected in the formal airspace change proposal and therefore the two submissions are aligned.	

<b>B.6</b>	<b>RECOMMENDATIONS/CONDITIONS/PIR DATA REQUIREMENTS</b>	
<b>B.6.1</b>	<b>Are there any Recommendations which the change sponsor <u>should try</u> to address either before or after implementation (if approved)? If yes, please list them below.</b>	<b>NO</b>
	N/A	
<b>B.6.2</b>	<b>Are there any Condition(s) which the change sponsor <u>must fulfil</u> either before or after implementation (if approved)? If yes, please list them below.</b>	<b>NO</b>
	N/A	
<b>B.6.3</b>	<b>Are there any specific requirements in terms of the data to be collected by the change sponsor for the Post Implementation Review (if approved)? If yes, please list them below.</b>	<b>YES</b>
	<p><b><u>STAKEHOLDER OBSERVATIONS</u></b></p> <p>The change sponsor is required to collate related stakeholder observations (enquiry/complaint data) and present it to the CAA. Any location/area from where more than 10 individuals have made enquiries/complaints must be plotted on separate maps displaying a representative sample of:</p> <ul style="list-style-type: none"> <li>• aircraft track data plots; and</li> <li>• traffic density plots</li> </ul> <p>The plots should include a typical days-worth of movements from the last month of each standard calendar quarter (March, June, September, December) from each of the years directly preceding and following implementation of the airspace change proposal.</p>	
<b>PART C – Consultation Assessment Conclusion(s)</b>		
<b>C.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>	<b>YES</b>
	The fundamental principles of effective consultation are targeting the right audience, communicating in a way that suits them, and giving them the tools to make informative, valuable contributions to the proposals development. I am satisfied that these principles have been applied by the change sponsor before, during and after the consultation. I am also satisfied that the	

change sponsor has conducted this consultation in accordance with the requirements of CAP 1616, that they have demonstrated the Government's consultation principles and that the consultation has:

- Taken place when the proposal was at a formative stage – having previously discarded two alternative options at Step 2B (Options Appraisal) of the airspace change process, the change sponsor was essentially consulting on a single design option. However, the consultation document makes it clear that the change sponsor was committed to reviewing and considering feedback and that any new requirements raised through the consultation process would be considered as part of the on-going design process.
- Presented the consultation material clearly and outlined the potential impacts that needed to be considered – the consultation material clearly articulated the need for airspace change and the scope of the change sponsor's proposal. It also provided the reader with a good level of information using narrative, charts and graphics to help stakeholders understand the current and proposed airspace arrangements, the evolution of the proposal and the change sponsor's rationale for determining that there would be no impact to stakeholders, both on the ground and other airspace users.
- Provided a sufficient timeframe to allow considered responses – whilst it is acknowledged that a 2-week consultation is shorter than the widely recognised standard of 12-weeks, the change sponsor provided an acceptable rationale for the reduced period and it was deemed entirely proportionate in this particular instance (see Section B4 above).
- Taken into account the product of the consultation – two responses were received to this consultation and both confirmed their support for the airspace change proposal, raising no issues for the change sponsor to acknowledge and address within their consultation response document.

**PART D – Consultation Assessment Approval**

	Name	Signature	Date
Consultation assessment completed by (Airspace Regulator – Engagement and Consultation)	[REDACTED]	[REDACTED]	8 <sup>th</sup> March 2021
Consultation assessment approved by (Principal Airspace Regulator)	[REDACTED]	[REDACTED]	21 April 2021