

Operational Service Enhancements Project:- New Amsterdam/London UIR Crossing Point

Gateway documentation: Stage 3 Consult

Step 3A Consultation Strategy V1.0



NATS

Roles

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References

Ref No	Description	Hyperlinks
1	OSEP:- New Amsterdam/London UIR Crossing Point – progress through CAP1616	Link
2	Stage 1 Assessment Meeting Presentation	Link
3	Stage 1 Assessment Meeting Minutes	Link
4	Stage 1 Design Principles	Link
5	Stage 2 Design Options and Evaluation	Link
6	Stage 2 Initial Options Appraisal including Safety Appraisal	Link

Contents

1.	Introduction.....	3
2.	Engagement Activities Completed To Date.....	4
3.	Consultation Strategy: Audience, Approach, Materials and Length	4
4.	Unexpected events, escalation, extension	6
5.	Reversion Statement.....	6
6.	Conclusion and Next Steps.....	7
7.	Annex A – List of Stakeholders.....	8

1. Introduction

- 1.1 Consultation is an essential part of the airspace change process, defined in CAP1616 and regulated by the Civil Aviation Authority (CAA).
- 1.2 Consultation is the sponsor's opportunity to formally engage a wide variety of stakeholders, inform them of the benefits and impacts of the proposal in a transparent and accessible way, and to acquire valuable feedback to inform the final proposal.
- 1.3 The foundation of a good consultation is adherence to the four 'Gunning Principles', which set out the legal expectations for what constitutes an appropriate consultation. The Gunning Principles are that:
 - the consultation should occur when proposals are at a formative stage.
 - the proposer must give sufficient reasons for any proposal to permit intelligent consideration and response.
 - adequate time is given for consideration and response.
 - the product of consultation must be conscientiously taken into account when finalising the design.
- 1.4 This document sets out our consultation strategy for the Operational Service Enhancements Project (OSEP):- New Amsterdam/London UIR Crossing Point ACP (Reference ACP-2019-054) in accordance with these Principles to ensure the consultation is effective and productive.
- 1.5 Previous documents described 10 options to improve the connectivity between the UK and Dutch UIRs within the Southern North Sea following the introduction of a new COP by Maastricht Upper Area Control (MUAC). Design Principle evaluation led to a single design option:
 - **Option 6:** Combined Option 1-5To accept for progression for this proposal.
- 1.6 The 'do nothing' option was discounted as it did not meet or partially met several of the design principles (See [Reference 5](#)).
- 1.7 The other 9 options considered were discounted as they did not meet or only partially met several of the design principles.
- 1.8 There is still scope for feedback on the specific details of the design option upon which we are consulting.
- 1.9 Following the Stage 2: Develop and Assess Gateway Assessment, this proposal has been confirmed by the CAA as a Scaled Level 2B change due to the changes being contained above FL200 and are over the sea.

2. Engagement Activities Completed To Date

- 2.1 Engagement activities have been undertaken with the relevant stakeholders (listed in Annex A) identified during the Stage 1 Assessment Meeting ([Reference 2](#)).
- 2.2 Engagement during Stage 1 focused on the development of a series of Design Principles ([Reference 4](#)), which were used to evaluate Design Options against.
- 2.3 Engagement during Stage 2 focused on the development of Design Options ([Reference 5-7](#)), to introduce a new crossing point on the interface between the London and Amsterdam Upper Information Regions (UIRs).
- 2.4 As yet, no stakeholder has objected to the proposal and feedback has been positive.
- 2.5 The stakeholder engagement summarised in the documents above show that appropriate 2-way engagement has taken place. Relevant stakeholders are fully aware of the proposed changes and have had the opportunity to shape the design principles and design options.

3. Consultation Strategy: Audience, Approach, Materials and Length

- 3.1 The timeline for this proposed airspace change is fixed by an agreed target implementation date of 1st December 2022 (AIRAC 12/2022). This fits in with the overall NATS change programme including target AIP and AIRAC dates as well as being aligned with MUACs requirements.
- 3.2 NATS are requesting a consultation period of 6-weeks.
- 3.3 NATS contends that this 6-week consultation period is proportionate for this airspace change. The change has been developed through collaboration between NATS and MUAC, the stakeholders subject to the greatest impact as they are the two ANSPs which manage the airspace. The change is located above FL245, therefore NATS perceives the impact to stakeholders to be very low. The changes under consideration are all contained within airspace above FL245 and over the sea and therefore will not be detectable to ground-based stakeholders. These changes will enable more efficient use of airspace over the North Sea, resulting in a reduction in fuel burn and corresponding greenhouse gas emissions by aircraft making use of these routes.
- 3.4 Subject to passing the consult gateway, NATS intend to commence the consultation on 3rd March 2022 and subsequently close it on the 14th April 2022.
- 3.5 Stakeholders will be informed via email when the consultation is launched. They will be able to view and download the consultation document on the on-line portal alongside links to supporting documentation. This is where they can also submit a response to the consultation. A link to the consultation portal will be provided on www.nats.aero and the [NATS customer affairs](#) websites.
- 3.6 The consultation material will be available online only, respondents will not be able to submit a postal response. We regularly engage with the targeted stakeholders listed in [Annex A](#) identified for this ACP via electronic means and are satisfied that this is the most appropriate format for this consultation. The targeted stakeholders for this consultation are MUAC (the ANSP managing the Amsterdam UIR), airlines (through NATMAC) and the MoD.
- 3.7 A reminder email will be sent out midway through the consultation (24th March 2022) to stakeholders reminding them of the closing date of the consultation.

- 3.8 At the start of the final week of the consultation (7th April 2022) we will send a final reminder of the closing date of the consultation and request a response from stakeholders who have not submitted a response. This is in order to achieve maximum participation.
- 3.9 At the end of the requested 6-week consultation deadline the responses will be analysed and themed; any late responses may not be included in the subsequent analysis.
- 3.10 NATS will acknowledge receiving responses by sending a completion message to the user, using the email address they provide. We will also include a list of FAQs on the consultation portal if responses require clarification or frequent queries arise.
- 3.11 All of the key stakeholders (listed in [Annex A](#)) who were engaged with during Stages 1-2, will be targeted and asked to respond to the consultation.
- 3.12 The MoD is a mandatory stakeholder in all airspace changes and will be consulted as a key consultation stakeholder via DAATM as per standard airspace consultations.
- 3.13 In addition to the stakeholders targeted in Stage 1 and 2, NATS will invite the 10 most prolific operators potentially impacted by this change to respond to the consultation:
- KLM
 - Ryan Air
 - Lufthansa
 - Delta Airways
 - Scandinavian Airlines
 - British Airways
 - Norwegian Air International
 - EasyJet
 - United Airlines
 - Norwegian Air Shuttle
- 3.14 Due to the chosen targeted stakeholder audience, this consultation shall use aviation technical language. We do not intend to make available versions of the consultation material in a non-technical manner. The consultation will be provided in English only as this is the international language of aviation.
- 3.15 Although not specifically targeted, we will welcome any other individual or organisation to submit a response; however, this will have to be done through the online portal. NATS are only specifically targeting the organisations discussed in this document, listed in [Annex A](#).

4. Unexpected events, escalation, extension

4.1 We have made robust plans for this consultation but, by definition, unexpected events may occur.

There are three escalating outcomes, on a sliding scale which can be generalised as:

- A short pause in the consultation, rapid resumption, closing as planned.

Minimal impact, no change to project timeline.

- A significant pause in the consultation, delayed resumption, consider extending the closing date.

Low to medium impact, potential delay to implementation date unless any agreed extension period can be absorbed into the remaining project timeline.

- A major event causing significant disruption to the consultation, resumption may not be possible, consultation may be significantly extended, partially repeated or relaunched, or withdrawn until further notice.

High impact, implementation date at risk, project re-planning required.

Should such an event manifest, we will analyse the situation, consider where the event falls in the scale above, and contact our regulator for guidance on resolution.

4.2 Covid-19 coronavirus (Covid-19)

NATS is mindful of the impact of the current Covid-19 pandemic and understands that this is a dynamic situation. We are in communication with the CAA regarding the potential impact of Covid-19 on this consultation and are monitoring the recommendations of Public Health England. Due to the perceived low impact of this ACP on stakeholders and the purely on-line approach of this consultation, a 6-week consultation period for this ACP is still considered adequate. We will continue to be flexible as the situation dictates. To mitigate the risk to public health, the consultation will be via the online portal ([CitizenSpace](#)) and any other engagement will be done remotely via telephone/video conferencing and/ or email as opposed to any face-to-face meetings until it is safe to do otherwise. Emails when sent will request read-receipts to confirm delivery of the email and any not read will be followed up after 1-week.

We will however continue to review the situation regularly and will revise the duration of the consultation if necessary. In the event that there is a change, the consultation portal will be amended to reflect this, and all stakeholders listed in [Annex A](#) will be notified by email.

5. Reversion Statement

5.1 In the unlikely event that there are unexpected issues caused by this proposal, reversion to the pre-implementation state would be possible as the proposed changes do not introduce any new CAS or interfere with any current ATS routings.

6. Conclusion and Next Steps

- 6.1 There are six design options being proposed for this airspace design which can be implemented independently or as part of a combination. NATS preferred option is to implement all 6 options as this will maximise the benefit to the stakeholders. Full descriptions of the design options can be found in the airspace change documentation published on the CAA website ([Reference 1](#)).
- 6.2 We consider this consultation strategy to be reasonable and proportionate. We have identified the relevant stakeholders, have engaged with those most likely to be impacted and have made it clear that there is scope to change the proposal based on their feedback.
- 6.3 Subject to passing the Stage 3 Gateway Assessment, we will finalise the consultation material and set up the appropriate online consultation web page and launch the consultation.

7. Annex A – List of Stakeholders

	Stakeholder
NATMAC	Airlines UK
	British Airline Pilots Association (BALPA)
	British Airways (BA)
	Low Fare Airlines
	Heavy Airlines
	Airspace 4 All
	MoD Via Defence Airspace and Air Traffic Management (DAATM)
	Guild of Air Traffic Controllers (GATCO)
	General Aviation Alliance (GAA)
	Aviation Environment Federation (AEF)
	Aircraft Owners and Pilot Association
	Association of Remotely Piloted Aircraft Systems (ARPAS)
	British Business and General Aviation Association (BBGA)
ANSP	NATS ¹
	MUAC
Airlines	KLM
	Ryan Air
	Lufthansa
	Delta Airways
	Scandinavian Airlines
	British Airways
	Norwegian Air International
	EasyJet
	United Airlines
	Norwegian Air Shuttle

End of document

¹ As the UK ANSP NATS are listed as a Stakeholder. However, NATS are the sponsor of this change and are not included in external engagement.