

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

**Gateway documentation:
Stage 3 Consult**

**Step 3A Consultation Strategy
V1.1**

NATS

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Roles

Action	Role	Date
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Drafting and Publication History

Issue	Month/Year	Changes this issue
1.0	February 2022	Published to the CAA online portal
1.1	March 2022	<p>Following CAA Stage 3 Gateway Feedback the following has been updated:</p> <ul style="list-style-type: none"> • Introduction amended to include background and objective of the change, • References numbers have been updated as required, • Justification for fixed implementation date enhanced, • Rationale for a web-based only approach expanded, • Rationale for what stakeholders are targeted and others not provided, • A section on Data sources has been added, • A statement included that fuel and CO₂ analysis will not be provided • Covid-19 section updated • Conclusion section updated, and • A foot note has been added to Annex A stating the listed airlines will be directly targeted.

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

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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-2019-055) in accordance with these Principles to ensure the consultation is effective and productive.

1.5 In December 2019, Maastricht Upper Area Control (MUAC) introduced Free Route airspace and Flexible Use Airspace (FRA/ FUA) into the Amsterdam Upper Information Region (UIR, Flight information Region (FIR) above FL245).

1.6 Following their introduction of FRA/FUA, MUAC identified a need to improve the existing connectivity between the UK ATS Upper route network and the Amsterdam UIR by the addition of a new coordination/crossing point (COP) on the London/Amsterdam Upper Flight Information Region (UIR) boundary. This new point will facilitate improved transfer of aircraft between the two Air Navigation Service Providers.

1.7 MUAC are introducing this point, named RENEQ, at the UIR boundary but are unable to provide connectivity to the UK Air Traffic Services (ATS) Route Network.

1.8 This change seeks to introduce connectivity between this new COP and the UK ATS route network.

1.9 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 MUAC. Design Principle evaluation led to a single design option:

- **Option 6:** Combined Option 1-5 (Connectivity to UK ATS Network provided through the introduction/amendment of new/extant CDRs).

To accept for progression for this proposal.

1.10 The 'do nothing' option was discounted as it did not meet or partially met several of the design principles (See [Reference 5](#)).

1.11 The other 9 options considered were discounted as they did not meet or only partially met several of the design principles.

1.12 There is still scope for feedback on the specific details of the design option upon which we are consulting.

1.13 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 5-6](#)), 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 date has been coordinated with MUAC to align the associated cross border activities. MUAC have requested that this change is implemented over the winter months limiting this change to the December 2022 or March 2023 AIRAC cycles. However, there is no capacity within the March 2023 AIRAC cycle to accommodate this change owing to the planned implementation of West airspace changes (ACP-2017/020 and ACP-2019/012).
- 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 For Level 2 ACP's which focus on aviation industry stakeholders, web-based consultation is the default approach. NATS intends to conduct this consultation purely via the online portal ([CitizenSpace](#)). This is considered proportional due to the location of the change as well as the purely positive benefit for stakeholders. This change will provide additional flight-planning options only impacting stakeholders operating above FL245 within the affected region. All targeted stakeholders are professional aviation organisations used to electronic methods of engagement.
- 3.5 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.
- 3.6 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.

- 3.7 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 representation), the top 10 airlines using the airspace will be directly targeted and the MoD.
- 3.8 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.
- 3.9 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.
- 3.10 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.
- 3.11 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.
- 3.12 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.
- 3.13 As this ACP is looking at introducing connectivity to a new COP contained within the En-route (above 7,000 ft) airspace, stakeholders groups representing individuals on the ground or lower (sub 7,000 ft) airspace users are not included.
- 3.14 This stakeholder list was formed from:
- The relevant members of the National Air Traffic Management Advisory Committee (NATMAC). The NATMAC list provides a panel of representatives from all aspects of aviation. Only NATMAC members which are considered to represent organisations which operate within the En-route airspace have been included in this engagement.

3.15 Airlines impacted by this change have representation through the NATMAC list, i.e. Airlines UK, BA, low fare airlines and heavy airlines. However, in addition to targeting airline representation through NATMAC, NATS will include the 10 most prolific operators potentially impacted by this change in our targeted stakeholder list:

- KLM
- Ryan Air
- Lufthansa
- Delta Airways
- Scandinavian Airlines
- British Airways
- Norwegian Air International
- EasyJet
- United Airlines
- Norwegian Air Shuttle

3.16 Organisations representing stakeholders which could be impacted by this change are also included, i.e. the Guild of Air Traffic Control Officers (GATCO) representing Air Traffic Control Officers.

3.17 The Ministry of Defence (MoD) are engaged with through Defence Airspace and Air Traffic Management (DAATM). DAATM is a focal point for all aviation matters which may impact military airspace and operations. DAATM collects feedback from all branches of the military which may be impacted to provide a single response. 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.

3.18 Two Air Navigation Service Providers (ANSPs) are impacted by this change.

- NATS En-Route Ltd (NERL) operates as the Air Navigation Service Provider (ANSP) for the UK airspace where connectivity will be introduced. As this is a NATS sponsored ACP, NERL are not formally included as stakeholders.¹
- Maastricht Upper Area Control operates as the ANSP for the Dutch airspace the new COP links to.

3.19 The following members of the NATMAC were deemed not to operate in the area concerned and were not engaged with:

- | | |
|--|---|
| • Airport operators Association | • British Microlight Aircraft Association |
| • Airport Operators Group | • British Model Flying Association |
| • Aircraft Owners and Pilots Association | • British Skydiving |
| • ACOG | • Drone Major |
| • BAe Systems | • Honourable company of Air Pilots |
| • British Balloon and Airship Club | • Helicopter Club of Great Britain |
| • British Gliding Association | • Iprosurv |
| • British Helicopter Association | • Isle of Man CAA |
| • British Hang Gliding and Paragliding Association | • Light Aircraft Association |
| | • PPL/IR (Europe). |

¹ NATS uses the same email account for requesting ACP stakeholder engagement as well as responding to requests for ACP stakeholder engagement. As such, although a response is not required, a response might be received.

- 3.20 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.
- 3.21 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](#).

Data sources

- 3.22 Radar Data will be provided from a 2-week period in August 2020 (3-16th) which follows the introduction FRA within the MUAC area of responsibility. This time period represents the most recent available data. However, traffic levels were greatly reduced by the Covid-19 pandemic in 2020 and therefore an analogous time period from 2019 (Aug 5-11th) is provided to demonstrate a clearer indication of traffic volume and patterns within the impacted UK UIR region. The 2019 traffic picture is relevant as traffic is forecast to return to these pre-pandemic levels.
- 3.23 The proposed track mileage savings within the London UIR were calculated by comparing the existing route with the proposed routing distance as determined from www.skyvector.com.
- 3.24 An analysis of fuel and CO₂ savings for this change will not be provided as this change will not result in any disbenefit being incurred on airspace users. This is assured as this change provides options in addition to existing routings and operators will be free to plan the most efficient route available to them at the time.

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 will continue to review the situation and government guidance in relation to the Covid-19 pandemic and will consider any changes should they occur. Should the situation dictate that the consultation timeframe needs to be updated, 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 A single design option is being consulted on to provide ATS route connectivity to a new COP introduced by MUAC. This consultation strategy describes how NATS will undertake the consultation for the Operational Service Enhancements Project (OSEP):- New Amsterdam/London UIR Crossing Point ACP to ensure the CAP1616 requirements are adhered to.

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
MUAC	
Airlines ³	KLM
	Ryan Air
	Lufthansa
	Delta Airways
	Scandinavian Airlines
	British Airways
	Norwegian Air International
	EasyJet
	United Airlines
	Norwegian Air Shuttle

End of document

² 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.

³ Airlines were not directly targeted during Stage 1 and 2. Engagement was through their representation with NATMAC.