

Swanwick Airspace Improvement Programme
Airspace Development 5
LAC West – ATS Route Connectivity Improvements

SAIP AD5
Gateway documentation:
Stage 3 Consult

Step 3A Consultation Strategy

The NATS logo is positioned on the right side of the page. It features the word "NATS" in a bold, italicized, blue sans-serif font. The letters are closely spaced, and the overall style is modern and professional. The logo is set against a white background, with a large, light blue decorative swoosh element that curves from the top left towards the bottom right, partially overlapping the logo's area.

NATS Uncontrolled

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References

Ref No	Description	Hyperlinks
1	SAIP AD5 CAA web page – 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	(link)
6	Stage 2 Design Principle Evaluation	(link)
7	Stage 2 Initial Options Safety Appraisal	(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.
- 1.2 This document aims to satisfy the requirements of Stage 3 Consult Gateway, Step 3A Consultation Strategy
- 1.3 As part of SAIP AD5, NATS is proposing a number of ATS Route improvements in the LAC west region. These will focus on the following three main areas of airspace development:
- Introduce CAS and ATS Routes for Birmingham arrivals and departures, via the MOSUN area.
 - Provision of a unidirectional tactical offload route and appropriate CAS for Heathrow inbound.
 - Introduce or revise a number of high-level ATS routes in the West End Sector Group
 - Amending the boundary of TRA 002, in conjunction with the MoD
- 1.4 The proposed CAS close to Birmingham would have a base of FL65 which could potentially affect GA traffic patterns, outside CAS and below 7,000ft. This proposal is therefore technically a Level 1 airspace change under CAP1616. This would not change commercial aircraft traffic patterns below 7,000ft but could potentially cause a change in GA traffic outside CAS and below 7,000ft.
- 1.5 We have assessed that there will be no discernible change in impact on noise, tranquillity or biodiversity. We have therefore contended that the environmental analysis will be scaled equivalent to a Level 2 change i.e. CO₂ emissions only.
- 1.6 Previous documents ^(Refs 4, 5 and 6) have reduced the number of design concepts to two main combined designs, and two sub-options associated with each; a total of four design options overall. They are referred to as combined options as they are full designs covering the aforementioned three main areas of airspace development (Paragraph 1.3).
(We have referred to the initial designs focussed on the separate elements of this proposal as the design concepts i.e. EGLL offload route design concepts.)
- 1.7 These four final combined design options are summarised below:
- **NATS preferred option - Design Option 1B:**
a larger Class C/ D volume near Birmingham; with Class C/ D for the other volumes; active evenings/ overnights/ mornings during weekdays and active H24 at weekends (except for the additional H24 vertical splits of CAS).
This is NATS preferred option as it provides maximum flexibility for ATC.
 - **Design Option 1A:**
a larger Class C/ D volume near Birmingham, with Class C/ D for the other volumes; active evenings/ overnights/ mornings, 7 days a week (except for the additional H24 vertical splits of CAS).
 - **Design Option 2A:**
a smaller Class C/ D volume near Birmingham; with Class C/ D for the other volumes; active evenings/ overnights/ mornings, 7 days a week (except for the additional H24 vertical splits of CAS).
 - **Design Option 2B:**
a smaller Class C/ D volume near Birmingham; with Class C/ D for the other volumes; active evenings/ overnights/ mornings during weekdays and active H24 at weekends (except for the additional H24 vertical splits of CAS).
- 1.8 These design options have taken into consideration the importance of airspace sharing and a simple activation/ deactivation method. This was discussed during engagement with appropriate stakeholders from the MoD, GA community, airlines and airports.

- 1.9 The “do nothing” options have been discounted as they did not fully meet any of the design principles, including the two highest priority principles of achieving ANSP agreement and an environmental benefit ^(Ref 6). These were assessed individually for each of the three areas of airspace development. There is still scope for feedback on the specific details of the design options upon which we are consulting – the removal of other options does not remove the scope for formative feedback.

2. Objectives

- 2.1 This is an en-route network proposal which is proposing new regions of CAS close to Birmingham; new ATS Routes for Birmingham traffic and Heathrow arrivals; and high-level routes within the western region.
- 2.2 We want to ensure that appropriate stakeholders, who could be negatively or positively impacted by these changes, are made aware of this airspace proposal and are given the opportunity to submit feedback about the designs.
- 2.3 Through our engagement activities undertaken so far, we want to make sure that the correct audience is targeted in an appropriate manner, and given the opportunity to respond. We also aim to ensure that the materials we produce provide stakeholders with enough information to respond; the length of the consultation is appropriate for responses and works within the project scope.

3. Summary of Engagement Activity Undertaken to Date

- 3.1 Prior to Stage 1 activities, NATS engaged with the IAA (Irish Aviation Authority) early in the design development phase of the SAIP AD5 design work, particularly in relation to the proposed Heathrow offload route and CAS. This included one-to-one briefings and workshops with the IAA on the proposed changes, in January and February 2018. The importance of IAA involvement and approval was reflected in Design Principle 6, stipulating ANSP achievement.
- 3.2 The NATS engagement and alignment activities have been carried out in accordance with the plan described in the Stage 1 Assessment Meeting Minutes ^(Ref 3).
- 3.3 Analytics completed an environmental benefits assessment for the four design options. This showed that all four of the options would result in a beneficial net saving in fuel burn. This was slightly greater for options 1B and 2B which would be available for a larger time period.
- 3.4 Stage 1 and 2 engagement activities have been carried out with relevant stakeholders in order to help refine the options. Specific airlines and airports, GA and the MoD were identified as relevant and representative stakeholders for the proposed designs. These have been listed in Annex A on Page 11, under Key Stakeholders. Other stakeholders have also been identified for the consultation; this is covered in Section 4.
- 3.5 The engagement activities have been based on the design concept options covered in the Design Options document ^(Ref 5). This engagement was used to inform the list of options which were evaluated against the Design Principles ^(Ref 4), resulting in the final four design options we are consulting on. All of the engagement activities are listed in Annex B on Page 12.
- 3.6 NATS held a Design and Assess workshop (27/09/18) with GA and MoD representatives, which concentrated on the proposed new airspace and routes. Workshop participants were sent a document summarising the design concepts under development prior to the workshop, and were asked to provide feedback on these during the workshop. Representatives from Airspace 4 all (formally FASVIG), MoD Brize Norton, MoD RAF (U) Swanwick and MoD via Defence Airspace and Air Traffic Management (DAATM) attended this workshop.
- 3.7 NATS held a separate workshop (16/10/18) with airport operators and airline representatives which had the same objective as the workshop with GA and MoD stakeholders. Representatives from Birmingham Airport, Heathrow Airport and the airlines British Airways, Flybe, Jet2, Ryanair, Stobart Air and Virgin Atlantic attended this workshop. Representatives from the IAG GBS and the additional airlines listed in Annex B were also invited but did not attend. The airlines were chosen as representative users of the relevant proposed CAS and routes.

- 3.8 Both of these workshops were preceded by, and followed up with, email exchanges including a full set of minutes from each workshop, which participants were asked to review.
- 3.9 The proposed Heathrow offload route and CAS were presented and discussed at the Bi-Annual North American/ European Air Traffic Flow Management Task Force (NAMEUR) meeting in Frankfurt (23/10/18). Attendees included FAA, Nav Canada, Eurocontrol and airlines which fly North Atlantic oceanic routes.
- 3.10 All of the proposed AD5 changes were presented at the Airspace and Flight Efficiency Partnership (AFEP) meeting (14/11/18). Attendees included airline representatives, Bae Systems, GAMA and Jeppesen. The increased flight efficiency from the proposed high-level ATS Routes was of particular interest, which the AFEP supports.
- 3.11 There have been additional phone calls and email exchanges with stakeholders to cover specific queries or aspects of the design concepts. All of this engagement, including from the Design and Assess workshops, has been considered in the final design options and drafting of the Stage 3 documentation.
- 3.12 All of the airfields, considered as other stakeholders, were phoned on the 12th and 13th December to ensure we had appropriate contact details prior to launching the consultation; which they will be informed of. They were also given an update on the progress of the SAIP AD5 proposal within the CAP1616 process. These airfields have been listed below and are also listed in Annex A: List of Stakeholders, on Page 11.

Relevant GA airfields – EGBE, EGBJ, EGBO, EGBP, EGBS, EGTK, EGBW

Relevant local airfield – EGNX

- 3.13 As yet, none of the stakeholders have objected to the proposal; however lots of feedback regarding the proposed design concepts has been provided. Much of the feedback has been focussed on airspace sharing and having a simple method for activation/ deactivation; this has been reflected in the final proposed design options we are consulting on.
- 3.14 All of the stakeholders referenced above will be engaged with during the SAIP AD5 consultation as key stakeholders. The operators covered by the National Air Traffic Management Advisory Committee (NATMAC) forum will also be engaged; however there will be some duplication with the aforementioned stakeholders. NATMAC has been listed as an 'other' stakeholder as they were not specifically engaged with as part of Stages 1 or 2.
- 3.15 Birmingham ATC and the MoD (Brize Norton, DAATM and Swanwick Military) have participated in a series of real time simulations in November and December 2018. One of the NATS SAIP project team also attended a reciprocal real time simulation in Birmingham.
- 3.16 The stakeholder engagement summarised above, show that appropriate engagement has occurred via appropriate mechanisms, and the most relevant stakeholders are fully aware of the proposed changes.

4. Audience

- 4.1 NATS does not plan to target organisations whose primary interest is environmental (e.g. noise, local air quality). There would be no change in impact as the changes are all contained within UK en-route airspace.
- 4.2 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. These have been summarised under Headings 4.4 - 4.8 below and are listed in Annex A: List of Stakeholders, on Page 11.
- 4.3 NATS will also target other stakeholders who have been identified as potentially being impacted by the proposed changes; these were not involved in Stages 1 to 2 engagement. These other stakeholders

have been summarised under Headings 4.9 - 4.11 below and are listed in Annex A: List of Stakeholders, on Page 11.

- 4.4 NATS will target airspace users classed as General Aviation (GA) through the A4A (formally FASVIG) group, the GAA and relevant gliding clubs. These are considered key consultation stakeholders. NATS are particularly interested in GA feedback on the new proposed CAS, near to Birmingham. There may be a low impact on GA users, particularly from a proposed block of CAS with a base of FL65; a Flight Level which 6% of GA users currently fly at or above in this region.
- 4.5 NATS will target Birmingham and Heathrow Airports as key consultation stakeholders. We anticipate Birmingham Airport will primarily be interested in the proposed new flows for Birmingham arrivals and departures via MOSUN. Similarly we expect Heathrow Airport to mainly be interested in the proposed offload route, CAS and high-level ATS routes. However both airport operators will be welcome to provide feedback on all proposed designs.
- 4.6 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. The MoD has specifically been engaged in relation to the impact the proposed changes would have on military traffic, such as Brize Norton traffic.
- 4.7 NATS will target the same airline operators who were engaged with as part of Stages 1 and 2 as key consultation stakeholders. These have been listed in Annex A: List of Stakeholders, on Page 11. NATS are particularly interested in airline feedback on the new proposed routes and CAS which they will fly themselves.
- 4.8 As mentioned above, the IAA has been involved since the early design development phase of the Heathrow offload route and CAS design. They are specifically interested in the UK/ Irish interface including the eastbound and westbound COPs between London and Shannon ACCs. The IAA will be invited to respond to the consultation as a key stakeholder; however any change must also be agreed via the letter of agreement process; in accordance with our Design Principle 6 of achieving ANSP agreement.
- 4.9 NATS will target members of the NATMAC (National Air Traffic Management Advisory Committee) forum as additional stakeholders, which includes a number of airline operators and organisations. These have been listed in Annex A: List of Stakeholders, on Page 11.
- 4.10 The BGA (British Gliding Association), who will be consulted with via NATMAC, have agreed to manage the consultation with the gliding community, rather than NATS engaging with specific glider units. The relevant potentially impacted members will be contacted and a consolidated response to the consultation will be provided.
- 4.11 Relevant GA and local airfields have been identified as operating in close proximity of the proposed changes. NATS will target these airfields as additional stakeholders. These have been listed in Annex A: List of Stakeholders, on Page 11.

5. Approach

- 5.1 Although the key stakeholders were specifically engaged as part of Stages 1 and 2, as a representative group, we will actively seek in-depth responses from all key and other stakeholders. These are all listed in Annex A: List of Stakeholders, on Page 11.
- 5.2 Stakeholders will be informed via email when the consultation is launched. They will be able to view and download the consultation document on the online consultation portal, alongside access links to supporting documentation. This is where they can also submit a response to the consultation.

- 5.3 We will put a link to the consultation on the NATS Customer Affairs website, one of the information transfer mechanisms between NATS and our customer airlines.
We will also put a link on the NATS.aero website, which is available to the public.
Any individual or organisation may submit a response; however we are only targeting the organisations discussed in this document.
- 5.4 Respondents will also be able to submit a postal response to the consultation. We will not commit to respond to postal responses directly; however respondents are welcome to include a stamped envelope if they do require a reply. The consultation postal address will be available online and within the consultation document.
- 5.5 The mid-point of the consultation will be 5 weeks after the email launch; however this is dependent on CAA approval for a reduced consultation, which is covered in Section 7.2. At this time we will consider the responses received so far and will actively request a progress update from those remaining stakeholders, taking into account the constraints detailed in this section.
- 5.6 If, by the final week of the consultation, there has been limited participation in the consultation we will send a final reminder of the closing date and request a response from stakeholders who have not submitted a response. This is in order to achieve maximum participation and ensure that the consultation strategy is achieved.
- 5.7 Responses will be managed and uploaded to the portal by the CAA. If responses contain any commercially sensitive data (such as typical aircraft weights / load factors etc.) then NATS expects CAA to redact that sensitive information, as part of its moderating practice. Should responses contain requests for clarification, a list of FAQs would be added to the consultation website.
- 5.8 At the end of the requested 11 week consultation deadline the responses will be analysed and themed; any late responses may not be included in the subsequent analysis. This is dependent on CAA approval for a reduced consultation, as covered in Section 7.2
- 5.9 NATS will acknowledge receiving responses by sending a completion message back 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.
- 5.10 In the event of any unexpected challenges or events, we will directly communicate and negotiate with stakeholders in order to resolve an issue and reach a mutual agreement. However we have already stated that there is no scope for lengthening the consultation if this is challenged.

6. Materials

- 6.1 Our stakeholders are considered to be an aviation expert audience; therefore we plan to use aviation technical language in the consultation material, in English only. We plan to conduct the consultation via the internet (including email and the online consultation portal) however respondents will also be able to submit a postal response.
- 6.2 The online consultation portal will include an overview into the proposed changes, the consultation document available for download (covered in Section 6.4 below) and a survey which will allow users to submit feedback through.
- 6.3 The portal will also include a number of questions for users to complete as feedback. They will focus on the scope of the proposal, adding for a level of support and give users the option to submit additional comments. Information will also be captured on the user; some of this will be mandatory (such as organisation being represented) and others optional (such as a postcode). The consultation document, covered in Section 6.4, has been written such that it contains enough relevant information for stakeholders to provide informed responses.

- 6.4 NATS has produced a Consultation Document which will be available on the consultation portal. This document will contain information on the current relevant airspace; the proposed changes including NATS' preferred design option; and the expected benefits and impacts of the proposal.
- 6.5 We will also use the online consultation portal to include any FAQs we receive during the consultation to ensure all stakeholders have sight of these.
- 6.6 A standard environmental analysis focussing on the fuel/ CO₂ impacts has been completed for the proposed change. No analysis relating to noise or local air quality has been completed because of the scaling of this proposal, as mentioned above in Section 1.5. We contend that the environmental analysis requirements for this proposal should be scaled equivalent to a Level 2 change i.e. CO₂ emissions only.
- 6.7 After the consultation, a consultation feedback document will summarise the themes and NATS' response to issues raised – this may involve making changes to the design. The feedback document will be available for download via the CAA portal, and the ACP will be written based on the final design described in the feedback report.

7. Length

- 7.1 The timeline for this proposed airspace change is fixed by an agreed target implementation date of 7th November 2019. This fits in with the overall NATS change programme including target AIP and AIRAC dates.
- 7.2 Typically, an airspace change consultation would have a 12-week duration. That period would push the timeline for implementation beyond the target implementation date and potentially impact upon other projects. This is accounting for the fixed periods of CAA decision-making and AIS data lead time for a single AIRAC cycle. We are therefore requesting a consultation period of 11-weeks.
- 7.3 We feel that a duration of 11 weeks for this targeted consultation would be sufficient given the pre-consultation engagement activities we have undertaken with our stakeholders. There have been significant stakeholder engagement activities including focussed design workshops and a consistent open dialogue throughout. We are confident that our stakeholders are already in a well-informed position to respond to the consultation, on designs which they have influenced. We will also inform all stakeholders a few days prior to the consultation launch as an additional prompt. See Section 3 for a summary of engagement activities undertaken and Annex A on Page 11 for a list of the stakeholders we have routinely engaged with.
- 7.4 Subject to passing the consult gateway, NATS intend to commence the consultation on Thursday 31/01/2019 and subsequently close it on Thursday 18/04/2019.

8. Reversion Statement

- 8.1 NATS considers this consultation to be the 'do minimum' option. The 'do nothing' option would still require Birmingham traffic to tactically leave CAS, and the Heathrow OCK to BNN stack-swaps would still create a highly complex situation.
- 8.2 Should the proposal be approved and implemented, it would be extremely difficult to revert to the pre-implementation state. This is due to the introduction of new permanent CAS and ATS Routes which operators would begin to flightplan via and use; rather than the routes or tactical scenarios currently used. The proposed changes would permanently and significantly change the airspace structure.
- 8.3 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 a RAD restriction. For a permanent reversion, the changes would have to be reversed by incorporating this into an appropriate future AIRAC date; of which there are only four a year.

9. Conclusion and Next Steps

- 9.1 There are four design options which are being proposed for this airspace design, as listed in Section 1.7. NATS preferred option is Design Option 1B.
- 9.2 The proposed and preferred option for the airspace design is Design Option 1B. Full descriptions of other options ^(Ref 5) and the details of how Option 1B was decided upon as the preferred option ^(Ref 6) can be found in the airspace change documentation published on the CAA website ^(Ref 1). Work has been ongoing on the specific route details of Design Option 1B, and the CO₂ analytics data uses the latest iteration. This analysis will provide the required information for the Full Options Appraisal.
- 9.3 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; given advance notice that the consultation would last 11 weeks subject to CAA approval; and primed them for that turnaround. We have made it clear that there is scope to change the proposal based on their feedback.
- 9.4 Subject to passing the Stage 3 Gateway Assessment, we will finalise the consultation material, set up the appropriate online consultation web page and launch the consultation via email.

10. Annex A: List of Stakeholders

Links to the consultation will be placed on the NATS Customer Website and also on the NATS public website.

The consultation is most relevant to the stakeholders listed below – who will all be emailed PDF copies of the consultation material, and sent links to the consultation feedback website - but is not exclusive to this list.

Any individual or organisation may submit a response; however we are only specifically targeting the organisations discussed in this document.

Key Stakeholders:

A4A	Airspace 4 all (formally FASVIG)
BAATL	Birmingham Airport Air Traffic Limited
BAL	Birmingham Airport Limited
GAA	General Aviation Alliance representing a partnership of GA organisations
HAL	Heathrow Airport Limited
IAG GBS	International Airlines Group Global Business Services
MoD	Ministry of Defence via Defence Airspace & Air Traffic Management (DAATM) MoD RAF Brize Norton MoD RAF (U) Swanwick

The following air operators were targeted:

AAL	American Airlines
ACA	Air Canada
BAW	British Airways
BEE	Flybe
DAL	Delta Airlines
EXS	Jet2
RYR	Ryanair
STK	Stobart Air
TCX	Thomas Cook
TOM	Thomson
TUI	TUI Group
UAL	United Airlines
VIR	Virgin Atlantic

Other Stakeholders:

Members and organisations of the NATMAC (National Air Traffic Management Advisory Committee): AOA, AOPA, ARPAS-UK, AEF, BA, BAE Systems, BALPA, Airlines UK, BBAC, BBGA, BGA, BHPA, BMAA, BMFA, BPA, BHA, GAA, GATCO, HCGB, Heavy Airlines, Honourable Company of Air Pilots, LAA, Light Airlines, Low Fares Airlines, PPL/ IR (Europe)

Please note that we will not engage with individual organisation multiple times, where they exist both as a known stakeholder for this consultation and within the NATMAC.

GA Airfields:

EGBE	Coventry
EGBJ	Gloucester
EGBO	Halfpenny Green
EGBP	Cotswold Kemble
EGBS	Shobdon
EGTK	Oxford
EGBW	Wellesbourne

Local Airfields: EGNX East Midlands

11. Annex B: Engagement Evidence

- Follow-up invitation to Develop & Assess meeting on 27/09/18, sent to GA and MoD stakeholders (18/09/18)
- Develop & Assess meeting held with GA and MoD stakeholders, Brettenham House London (27/09/18)
- Notes from Develop & Assess meeting on 27/09/18 sent to GA and MoD stakeholders for review (02/10/18)
 - o Follow-up email for final comments sent (09/10/18)
- Invitation to Develop & Assess meeting on 16/10/18, sent to Birmingham Airport stakeholders (03/10/18)
- Invitation to Develop & Assess meeting on 16/10/18, sent to airport operators and airlines (10/10/18)
- Develop & Assess meeting held with airport operator and airline stakeholders, Heathrow Hyatt Hotel (16/10/18)
- Invitation to simulations sent to IAA stakeholders (19/10/18)
- Notes from Develop & Assess meeting on 16/10/18 sent to airport operators and airlines for review (23/10/18)
 - o Follow-up email for final comments sent (02/11/18)
- Latest design concepts sent to GA and MoD stakeholders, prior to Stage 2 Step 2A and 2B submission (30/10/18)
- Airline briefing on SAIP AD5 at NAMEUR meeting in Frankfurt (23/10/18)
- Engagement with Jet2 representatives at Swanwick Centre (25/10/18)
- Engagement with North Atlantic carriers on proposed AD5 Heathrow offload route and CAS changes (02/11/18)
- Engagement with military on the proposed TRA 002 changes (05/11/18)
- Engagement with TUI on proposed AD5 changes (08/11/18)
- SAIP AD5 project briefed Bristol Airport on the proposed changes, via calls (31/10/18)
- SAIP AD5 project briefed Cardiff Airport on the proposed changes via a WebEx (12/11/18)
- SAIP AD5 project update presented at the Airspace and Flight Efficiency Partnership (AFEP) Meeting (14/11/18)
- Stage 2 submission email sent to airline stakeholders (16/11/18)
- Stage 2 submission email sent to airport operator stakeholders (16/11/18)
- Stage 2 submission email sent to GA stakeholders (16/11/18)
- Stage 2 submission email sent to MoD stakeholders (16/11/18)
- AD5 simulation held at Birmingham Airport which NATS attended (16/11/18)
 - o An email summarising the key points from the simulation was sent by NATS (16/11/18)
- Update on the latest relevant AD5 work and an invitation to attend simulations was sent to IAA stakeholders (19/11/18)
- Update on the latest AD5 work and invitation to sims was sent to Bristol and Cardiff Airport stakeholders (21/11/18)
- Update on the latest AD5 work sent to representative from IAG GBS (23/11/18)

End of document