

# CAA Engagement Assessment

Title of airspace change proposal	OSEP [Operational Service Enhancement Project]: Improved connectivity through new and/or amended ATS routes/waypoints
Change sponsor	NATS NERL
Project reference	ACP-2021-061
Account Manager	[REDACTED]
Case study commencement date	31 <sup>st</sup> October 2024
Case study report as at	20 <sup>th</sup> November 2024

### Instructions

In providing a response for each question, please ensure that the 'status' column is completed using the following options:

- YES
- NO
- PARTIALLY
- N/A

To aid the SARG Lead it may be useful that each question is also highlighted accordingly to illustrate what is:

resolved YES not resolved PARTIALLY not compliant NO

### Executive Summary

This airspace change proposal, submitted by NATS En-Route Ltd (NERL) aims at improving the connectivity of the ATS route network and airspace structures between the London and Amsterdam FIRs, above FL175 (17,500 feet), over the North Sea. The change sponsor has identified a series of small-scale changes within this area of airspace that are intended to improve the connectivity between the UK ATS route network and adjacent FIR boundaries whilst improving fuel efficiency and reducing greenhouse gas emissions. It will also seek to reduce pilot/controller workload where practicable by improving flight plan predictability.

These small-scale changes consist of:

1. Realignment of the East Anglia Military Training Area (MTA) (eastern corner). This would facilitate:
  - Optimise northbound route structure FL245+ = approx. 98 tonnes p.a. enabled fuel savings
  - Optimise southbound route structure FL245+ = approx. 110 tonnes p.a. enabled fuel savings

Other changes not dependant on the East Anglia MTA revisions proposed:

2. Optimise westbound route structure at KOLAG = approx. 118 tonnes p.a. enabled fuel savings
3. Optimise westbound route structure at NAVPI = reduced complexity for LTMA inbounds

Following the Stage 1 Gateway, which was passed on the first attempt, the change sponsor developed a set of design options for each of the small-scale changes listed above, consisting of a current baseline scenario/do nothing, alongside a proposed set of scenarios that aim to deliver each of the above. It was agreed with the change sponsor that due to the nature of the proposal, a targeted period of engagement on these design options could be undertaken with relevant aviation stakeholders, rather than a full Stage 3 consultation. All stakeholders who were identified and contacted at Stage 1, were asked for feedback on these options over a three-week period, commencing on 19<sup>th</sup> December 2024. The engagement material that was sent to all stakeholders, outlined in detail the proposed design options, and how these would potentially benefit existing users. The engagement material did not however, provide an analysis of each option against each of the design principles that were devised at Stage 1, although an analysis of this was included in the submission, and a document containing all of the design principles was uploaded to the portal, prior to the period of engagement.

In addition to this, the change sponsor also undertook additional meetings and presentations with certain stakeholders who were considered to be key, prior to and after the engagement period had ended. Evidence was also included in the submission of the change sponsor being proactive in identifying and contacting additional relevant stakeholders who may also be affected.

The fundamental principles of an effective engagement as per CAP1616 include targeting the right audience, communicating in a suitable way, and giving them the tools to make informative contributions. I am satisfied that these principles have been applied by the change sponsor throughout the engagement period, and as per the requirements outlined in CAP1616.

PART A – Summary of Airspace Change Process to date		
A.1	<a href="#">Airspace change proposal public view</a>	
A.2	Stage 1 DEFINE Gateway	27.10.2023
A.2.1	Passed on the first attempt, as the CAA was satisfied that the change sponsor had met the requirements of the process up to that point and approval was given to progress to the next stage of the process.	
A.3	Stage 2 DEVELOP & ASSESS Gateway	N/A
A.3.1	Stage 2 Gateway not undertaken. The change sponsor undertook a three-week period of engagement from 19 <sup>th</sup> December 2023.	
A.4	Stage 3 CONSULT Gateway	N/A

A.4.1	Not undertaken, as this is a scaled ACP.	
A.5	Stage 4 UPDATE & SUBMIT	05.09.2024
A.5.1	The change sponsor submitted the Submission Document (which included the Engagement Strategy), along with the Engagement Evidence Document to the CAA, in order for the regulatory assessment to commence.	

PART B – Engagement Assessment		
B.1	AUDIENCE	
B.1.1	Did the change sponsor target the right audience?	YES
	<p>The change sponsor produced a submission document which included an Engagement Strategy in section 5 that listed all stakeholders who were engaged with, how they were identified, and a rationale for identifying them. As the changes proposed are above FL175, the change sponsor targeted the engagement with stakeholders who were considered to be appropriate and most affected by this proposal.</p> <p>Targeted stakeholders remained the same as at Stage 1 and prior to Stage 2, the change sponsor categorised these stakeholders into two groups: ‘Key Stakeholders’ and ‘Other Stakeholders’ as follows:</p> <p><b>Key Stakeholder Groups (ANSPs, MoD)</b> Maastricht Upper Area Control (MUAC), LVNL (Dutch ANSP) and DAATM</p> <p><b>Other Stakeholder Groups (Airlines, NATMAC members, Airports)</b> <b>Airlines:</b> KLM, Aer Lingus, Lufthansa, Jet2, Ryanair, Delta, TUI, easyJet, Wizzair and Emirates. <b>NATMAC members:</b> Airlines UK, Heavy Airlines, Low Fare Airlines and Guild of Air Traffic Control Officers (GATCO). <b>Airports:</b> Luton, Stansted and Cambridge (including Marshalls of Cambridge who are based at the airport). It should be noted that these airports were engaged with separately after the formal period of engagement ended.</p> <p>These amounted to a total of 21 stakeholders. Key stakeholders were considered by the change sponsor to be most impacted by the proposal and were subjected to face-to face meetings and briefing sessions to discuss aspects of the design. This took place between December 2023 and June 2024.</p> <p>Stakeholders that fell within the ‘Other Stakeholder Groups’ were identified as follows: Airlines: the change sponsor used flight plan data for the key routes in the area to identify the ten listed airlines who mostly use this area of airspace. NATMAC members: the change sponsor only engaged with the above four listed members, due to their usage of the upper airspace which lies within this this proposal. Airports: Luton, Stansted and Cambridge Airports were engaged with separately on the</p>	

	basis of the change sponsor proposing truncations to the Standard Arrival Routes (STARs) for Luton and Stansted Airports. Traffic using Cambridge Airport utilise the Stansted STARs.
B.1.2	Please provide a summary of responses below
	<p>Copies of the responses that had been submitted, were included within the Engagement Evidence document and the change sponsor summarised the responses received within tables 5 and 6 of the submission document. Seven responses were summarised within these tables; however, further analysis appears to suggest that eight had been submitted, as the change sponsor included KLM's response within an email dated: 4<sup>th</sup> June 2024. Whilst this was after the formal engagement period, other responses received outside of the engagement period had also been included within tables 5 and 6.</p> <p>Six of the stakeholders identified above were listed as having provided comments (LVNL, MUAC, DAATM/MoD, Luton Airport, EasyJet and Emirates). The Lead Operator Cabinet Panel was also listed as providing comments and further analysis of the Engagement Evidence document, appears to show these comments arising from a meeting that took place via Microsoft Teams between the change sponsor and airlines that formed this panel (Delta Air Lines, EasyJet, Ryanair, United Airlines and Virgin Atlantic).</p> <p>Within these tables, each response was categorised into the following:</p> <ul style="list-style-type: none"> <li>• Component 1: Engagement feedback for the East Anglia Military Training Area (EAMTA) and adjacent route revisions (facilitating the realignment of the northbound and southbound route structures to the east of the MTA)</li> <li>• Component 2: Engagement feedback for the optimisation of westbound structure at KOLAG COP.</li> </ul> <p>The feedback form asked whether stakeholders supported these design options (either as agree, disagree, neutral, or N/A) with a box included for any further comments. However, not all responses were submitted using the feedback form. Responses received were as follows:</p> <p><u>EasyJet:</u> Feedback was neutral but supported the optimisation of the westbound route structure at KOLAG, as this change above FL200 should not impact domestic traffic and should reduce the amount of regulation applied.</p> <p><u>Emirates:</u> Feedback on all the options was neutral, with no further comments submitted on the feedback form.</p> <p><u>Luton Airport:</u> Supported all the options and considered that flights above FL200 will have little impact on Luton's arrivals and will potentially improve fuel usage.</p>

	<p><u>DAATM/MoD:</u> Support the proposed change in shape of the EAMTA to facilitate a new DCT between DOLAS and NAVPI.</p> <p><u>LVNL (Dutch ANSP):</u> New waypoint ENZEN (new COP) reserved for use and has been approved for use by ICAO. EHRD/EHEH/EHBD traffic will run MONIL-DCT-ENZEN as proposed. DCT will be used AMGOD to ENZEN for outbound EHLE traffic, no ATS route. As a 'Key Stakeholder' engagement has been ongoing, with meetings taking place outside of the engagement period. The feedback summarised by the change sponsor appears to be from these meetings, and the minutes have been included in the Engagement Evidence document.</p> <p><u>MUAC:</u> Appears to support the proposal. Noted that KOLAG is not flight plannable and will be removed from the DUTCH AIP. L60 is published up to FL660, and MUAC will require a system / map update to reflect the changes. As a 'Key Stakeholder' engagement has been ongoing, with meetings taking place outside of the engagement period. The feedback summarised by the change sponsor appears to be from these meetings, and the minutes have been included in the Engagement Evidence document.</p> <p><u>Lead Operator Carrier Panel:</u> Appears to support the proposal and agreed that these proposals were valuable. The shorter the routing, the better, with these small benefits all adding up over time. This feedback was from a presentation that took place with the change sponsor on 24<sup>th</sup> June 2024.</p> <p><u>KLM:</u> Appears to support the proposal and indicates that flights via KOLAG after the change could save fuel and also indicated that savings if routing via BERGI-L60-ELDIN-XETRA-SOPEK instead of via KOLAG will save approximately 110,000 kgs fuel annually. This feedback was included in an email from the change sponsor after the engagement period had ended and has been included within section EE8 of the Engagement Evidence document.</p>		
B.2	APPROACH		
B.2.1	<table border="1"> <tr> <td data-bbox="340 1161 1774 1217">Did the change sponsor engage stakeholders in a suitable way?</td> <td data-bbox="1774 1161 2016 1217">YES</td> </tr> </table>	Did the change sponsor engage stakeholders in a suitable way?	YES
Did the change sponsor engage stakeholders in a suitable way?	YES		
	<p>Emails were sent to all stakeholders at the start of the engagement period and included weblinks to the engagement material (in the form of a slidepack) that outlined in detail, the four design options that are being proposed, along with a response form. Given the change sponsor engaged with targeted aviation stakeholders, this was deemed appropriate. Key stakeholders were engaged with more extensively through meetings and separate presentations that are documented in the Engagement Evidence document.</p>		

B.2.2	What steps did the change sponsor take to encourage stakeholders to engage in the engagement?	
	<p>Although this was a targeted engagement, the change sponsor proactively engaged with key stakeholders through meetings that were held prior to, during and after the period of engagement. Once it had become apparent that the Standard Arrival Routes (STARs) for Luton and Stansted Airports would have been affected, the change sponsor added these as key stakeholders, along with Cambridge Airport. The engagement material was modified and sent to MUAC, Luton, Stansted and Cambridge Airports and the Lead Operator Carrier Panel after the engagement period ended, to encourage further awareness of the proposal and encourage further responses.</p> <p>During the period of engagement, the change sponsor sent a reminder email on 2<sup>nd</sup> January 2024 to encourage responses. It was made clear within the submission document, that whilst only the listed stakeholders were contacted for feedback, responses were welcomed from any individual or organisation which considers the change might impact them by publishing the engagement material on the portal.</p>	
B.2.3	Was the change sponsor required to respond to any unexpected events and/or challenges?	N/A
	No. The change sponsor has not mentioned any unexpected events and/or challenges, and none have been identified.	
<b>B.3</b>	<b>MATERIALS</b>	
B.3.1	What materials were used by the change sponsor during the engagement?	
	<p>The emails sent by the change sponsor at the start of the engagement period contained a very brief summary of the proposal including a snapshot of a map showing the airspace structures between the London and Amsterdam FIRs. The email contained a weblink to a slidepack presentation that articulated the current design options in greater detail that will aim to deliver the operational service enhancements that NATS are seeking in this proposal, as outlined in the Executive Summary.</p> <p>Individual slides within the pack contained further details on each design option, including charts showing the current routing and proposed design option, details of the engagement period and how feedback can be submitted (with a link to a feedback form) were also included on the email. There was not an analysis of each option against each of the design principles that were devised at Stage 1, although the design principles were uploaded to the portal, prior to the period of engagement commencing and were also included in the submission. The follow-up email sent on 2<sup>nd</sup> January 2024 attached the slidepack and included the weblink to the feedback form.</p>	
B.3.2	Did the materials provide stakeholders with enough information to ensure that they understood the issue(s) and potential impact(s) on them?	YES
	The text within the email was very brief, although there was a clear weblink to the slidepack presentation that contained details of each of the options that were listed above. These were presented in a clear and accessible way that included charts	

	<p>showing current and proposed new routing traffic flows for each option, along with fuel and CO2 data. Enough information was provided that enabled stakeholders to submit meaningful responses. The slidepack was slightly modified to brief MUAC, Luton and Stansted Airports, with the slidepack also being slightly modified when being sent to Cambridge Airport to include Luton's, Stansted's STARs which apply to Cambridge traffic.</p>	
<b>B.4</b>	<b>LENGTH</b>	
B.4.1	Please confirm the start/end dates and the duration of the engagement below	
	<p>The engagement period commenced on 19<sup>th</sup> December 2023 and ended on 10<sup>th</sup> January 2024 (a period of just over three weeks that included the Christmas and new year holiday). During the design options development, revisions were proposed to the STARs for Luton and Stansted Airports and the change sponsor recognised that these impacted airports should be engaged with. The change sponsor engaged with these airports on 19<sup>th</sup> March, with feedback requested by 28<sup>th</sup> March.</p> <p>Cambridge Airport and Marshalls of Cambridge (which are based at the airport), were also identified as additional stakeholders by the change sponsor after the formal engagement period and were contacted separately on 3<sup>rd</sup> June 2024, with feedback requested by 24<sup>th</sup> June.</p> <p>A screenshot of the emails sent by the change sponsor to Luton, Stansted and Cambridge Airports, along with the slidepack has been included in section EE6 of the Engagement Evidence document.</p>	
B.4.2	If duration was less than 12 weeks, what was the justification?	YES
	<p>CAP1616h does not suggest a timescale for engagement, although the extent of the engagement required will depend on local circumstances and the scale and impact of the airspace change proposal. Any period of engagement should be fully justified within the final submission. The change sponsor's rationale for a three-week period of engagement, was due to the change being limited to routes above FL175, its operational and environmental benefits in terms of reducing fuel burn and CO2, and the same stakeholders being engaged with at Stage 1, (who were considered by the change sponsor to be of relevance to the proposal). Most stakeholders therefore had prior knowledge of the proposal.</p>	
B.4.3	Was the period of engagement proportionate?	YES
	<p>Whilst the three-week period of engagement was conducted over the Christmas and new year period, the engagement period was considered to be proportionate and appropriate, due to the type and scale of the proposal.</p> <p>The change sponsor was proactive in contacting Luton, Stansted and Cambridge Airports for feedback after the formal period of engagement had taken place and stakeholders who were categorised by the change sponsor as being 'key stakeholders', were also invited to additional face-to-face briefings, along with follow-up meetings to discuss design and implementation issues. These took place between the MoD, MUAC and LVNL, from December 2023 to June 2024. A record of these meetings has been included within sections EE2-EE4 of the Engagement Evidence document, as part of the submission.</p>	

B.5	GENERAL	
B.5.1	Was the conduct of the consultation aligned with the consultation strategy?	N/A
	As this is a Level 3 airspace change proposal, the change sponsor is not required to submit a consultation strategy. However, The period of engagement was conducted in line with the Engagement Strategy, which was contained within Section 5 of the submission document. The strategy outlined all of the stakeholders who were engaged with (including Luton, Stansted and Cambridge Airports who were separately notified after the engagement had taken place), the engagement activity that has taken place to date and a brief summary of the engagement material that was sent to all stakeholders.	
B.5.2	Has the change sponsor categorised the responses in accordance with CAP 1616?	N/A
	As this is a scaled Level 3 airspace change proposal where a Stage 3 consultation did not formally take place, the change sponsor was not required to submit a categorisation of responses.	
B.5.3	Has the change sponsor correctly identified all of the issues raised during the engagement and accurately captured them in the engagement response document?	PARTIALLY
	The responses submitted on the feedback forms from Luton Airport, Emirates and EasyJet were accurately summarised within tables 5 and 6 of the submission document, along with the engagement response from the Lead Operator Cabinet Panel. However, the post engagement response from KLM that was taken into account by the change sponsor was not included within the summary tables (despite it being mentioned in paragraph 6.3.3 of the submission document), and the responses from MUAC and LVNL could have been elaborated further as these were from ongoing engagement, prior to and after the engagement period.	
B.5.4	Does the engagement response document detail the change sponsor's response to the identified issues? Is the change sponsor's response to the issues raised appropriate/adequate?	YES
	<p>The submission document did not contain responses from the change sponsor to each of the individual comments that were submitted. Questions that arose from MUAC and LVNL during the various meetings that took place between them and change sponsor, were largely dealt with during those meetings, or during any follow-up meetings.</p> <p>The change sponsor stated under both these tables that the feedback received did not impact any of the proposed routing structures. Whilst KLM's feedback was missing from the engagement summary feedback in tables 5 and 6 of the submission document, having reviewed the summaries provided and the copies of the responses that were included within the Engagement Evidence document, this assessment by the change sponsor would appear adequate, given this is a pre-scaled Level 3 assessment.</p>	
B.5.5	Is the formal airspace change proposal aligned with the conclusions of the consultation response document?	YES



	The evidence included within the submission document and Engagement Evidence document, show that the formal airspace change proposal is aligned with its conclusions.	
B.5.6	Was a Public Evidence Session required for this proposal? If yes, was any new evidence presented which could alter the conclusions of the consultation response document and/or formal airspace change proposal submission?	N/A
	As this is a Level 3 airspace change proposal, there is no requirement to holding a Public Evidence Session.	
B.6	<b>RECOMMENDATIONS/CONDITIONS/PIR DATA REQUIREMENTS</b>	
B.6.1	Are there any Recommendations which the change sponsor <b>should try</b> to address either before or after implementation (if approved)? If yes, please list them below.	YES
	<p><b><i>GUIDANCE NOTE:</i></b> Recommendations are something that the change sponsor <b>should try</b> to address either before or after implementation, if indeed the airspace change proposal is approved. They may relate to an area in which the change sponsor is reliant upon a third party to actually come to an agreement and consequently they do not carry the same 'weight' as a Condition.</p> <p>The change sponsor should include a summary of KLM's response within tables 5 and 6 that are included under section 5.6 of the submission document.</p>	
B.6.2	Are there any Condition(s) which the change sponsor <b>must fulfil</b> either before or after implementation (if approved)? If yes, please list them below.	YES
	<p><b><i>GUIDANCE NOTE:</i></b> Conditions are something that the change sponsor <b>must fulfil</b> either before or after implementation, if indeed the airspace change proposal is approved. If their proposal is approved, change sponsors <b>must</b> observe any condition(s) contained within the regulatory decision; failure to do so <b>will usually</b> result in the approval being revoked. Conditions should specify the consequence of failing to meet that condition, whether that be revoking the ACP or some alternative.</p> <p>The change sponsor shall inform the stakeholders of the decision (when published), and what will happen next.</p>	
B.6.3	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.	YES
	If the proposed change is approved for implementation, the change sponsor must ensure that all inquiries and complaints data from stakeholders are collected and presented to the CAA.	
	<b><u>STAKEHOLDER OBSERVATIONS</u></b>	

	<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>
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<b>PART C – Engagement Assessment Conclusion(s)</b>		
C.1	Does the engagement meet the CAA’s regulatory requirements of the pre-scaled level 3 process?	YES
	<p>The fundamental principles of effective engagement are targeting the right audience, communicating in a way that suits them, and giving them the tools to make informative, valuable contributions to the proposal’s development. I am satisfied that these principles have been applied by the change sponsor before, during and after the engagement. I am also satisfied that the change sponsor has conducted this engagement in accordance with the requirements of CAP 1616 and that the engagement has:</p> <ul style="list-style-type: none"> <li>• Taken place when the proposal was at a formative stage – evidenced by the Engagement Strategy.</li> <li>• Presented the engagement material clearly and outlined the potential impacts that needed to be considered – evidenced by the engagement material in the form of a slidepack that was sent to all stakeholders listed in the Engagement Strategy.</li> <li>• Provided a sufficient timeframe to allow considered responses – evidenced by a three week engagement period and further opportunities for engagement.</li> <li>• Taken into account the product of the engagement – evidenced by the responses received that are contained within the Engagement Evidence document. The CAA agrees with the change sponsor to move forward with the options that are outlined in Section 6 of the submission document.</li> </ul>	

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Level 3 ACP

<b>PART D – Engagement Assessment sign-off</b>			
	<b>Name</b>	<b>Signature</b>	<b>Date</b>
Engagement assessment completed by Airspace Regulator (Engagement and Consultation)	[REDACTED]	[REDACTED]	20.11.2024
Engagement assessment conclusions approved by Principal Airspace Regulator	[REDACTED]	[REDACTED]	04/12/24