

## CAA Engagement Assessment

Title of airspace change proposal	Replacement of DTY 3N/4P SIDs with SAPCO 1N/1P SIDs
Change sponsor	Manchester Airports Group (MAG)
Project reference	ACP-2023-039
Account Manager	
Case study commencement date	04/09/24
Case study report as at	30/09/24
<p><b>Instructions</b></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>	

Executive Summary
<p>On 1st June 2023 the Manchester Airports Group (MAG), as the change sponsor, submitted a Statement of Need (SoN) proposing the re-alignment and truncation of the East Midlands Airport (EMA) DTY 3N/4P Standard Instrument Departures (SIDs) to terminate at waypoint SAPCO. In the SoN it was proposed that the DTY 3N/4P SIDs were truncated ahead of the RNAV Substitution of Eligible Conventional Procedures (ACP-2024-009). Following the Assessment Meeting the proposal was designated, by the CAA, a Level 3 Permanent ACP. Several SIDs at other airports (including MAG's Manchester Airport) have been truncated leading to a positive effect on airline fuel burn, with minimal impact on Air Traffic Control (ATC) procedures and no impact on non-aviation stakeholders. As a result of these SID truncations, there was no change to the lateral track or vertical profile from what was previously published and flown. Replacement of the DTY 3N/4P with SAPCO 1N/1P SIDs will provide the same benefits as have been experienced from truncations.</p> <p>Aside from the 'Do nothing Option' there were two viable options. Truncate at DTY D23 on the extant DTY 3N/4P SIDs or replace the DTY 3N/4P SIDs with SAPCO 1N/1P SIDs. The preferred and recommended option was the third option, to replace the DTY 3N/4P SIDs with SAPCO 1N/1P SIDs. Replacing the DTY 3N/4P SIDs with SAPCO 1N/1P SIDs will have no impact on the actual lateral track or vertical profile flown below 7,000ft and will provide the same environmental benefits as truncating at DTY D23.</p>

*The engagement delivered was audience led with MAG suggesting that engagement be concentrated on local aviation stakeholders and NATMAC members. There was one round of engagement taking 6 weeks (42 days) from the 16th of May 2024 to the 27th of June 2024, during which emails were sent to all affected stakeholders. The evidence received after engagement showed operators welcomed the change and its purpose.*

*In a meeting on Wednesday 21st August 2024, later confirmed by e-mail, CAA advised MAG that the ACP-2023-039 was no longer considered a re-alignment and truncation of the EMA DTY 3N/4P Standard Instrument Departures (SIDs). MAG were advised that from this point forward ACP-2023-039 should be regarded as a replacement of the EMA DTY 3N/4P SIDs with new SAPCO 1N/1P SIDs. CAA confirmed that ACP-2023-039 remained a CAP1616 Level 3 change. As dialogue and engagement had been completed with all stakeholders, MAG highlighted that at future meetings with stakeholders, they would highlight the alteration in title and description emphasising that the intention to finish the SIDs at SAPCO, engaged upon, remained unchanged.*

PART A – Summary of Airspace Change Process to date		
A.1	<a href="https://caa.co.uk">Airspace change proposal public view (caa.co.uk)</a>	
A.2	Stage 1 DEFINE Gateway	N/A
A.2.1		
A.3	Stage 2 DEVELOP & ASSESS Gateway	N/A
A.3.1		
A.4	Stage 3 CONSULT Gateway	N/A
A.4.1		
A.5	Stage 4 UPDATE & SUBMIT	05/09/24
A.5.1	<i>The sponsor submitted all the required documentation to enable regulatory assessment to commence.</i>	

PART B – Engagement Assessment	
B.1	AUDIENCE

B.1.1	Did the engagement target the right audience?	YES
	<p><i>According to the engagement strategy document, the change sponsor identified the main stakeholders who needed to be engaged with who included:</i></p> <p><i>Aviation stakeholders; -</i></p> <ul style="list-style-type: none"> <li><i>Air Traffic Control (ATC) at both East Midlands Airport (MAG colleagues) and the London Area Control Centre at Swanwick (NATS En Route Ltd).</i></li> <li><i>Airlines operating aircrafts from East Midlands Airport.</i></li> <li><i>NATMAC members.</i></li> </ul> <p><i>Appendix 11 shows a list of about 45 of these stakeholders (25 airlines and 20 NATMAC members).</i></p> <p><i>As the ACP is a level 3 change, sponsor stated that it would have no effect on local communities and little effect to aviation stakeholders other than those operating into and out of East Midlands Airport (EMA). MAG therefore suggested that engagement needed to be concentrated on local aviation stakeholders and NATMAC members. They determined that in the aviation community, affected stakeholders are those controlling aircraft, flight planning or flying aircraft departing East Midlands Airport on the DTY 3N/4P SIDs.</i></p> <p><i>Sponsor advised that operators of flying schools and other GA traffic do not typically use (and are unlikely to use) SIDs. Their slow ground speed and desire/preference to fly by Visual Flight Rules makes use of SIDs prohibitive. The change proposed would therefore in no way affect access to or operation to/from EMA for these operators. Therefore, they were not included in the stakeholders list.</i></p> <p><i>Although the engagement document talks about community stakeholders and states that since mid-2023 sponsor has reported to the quarterly East Midlands Airport Independent Consultative Committee (ICC) and presented to their sub-committee Monitoring, Environment, Noise and Track (MENT) meetings plus updated Parish Councillors at the EMA six-monthly meetings, the specific details of these stakeholders were not included in any of the engagement material and or on the stakeholder list.</i></p>	
B.1.2	Please provide a summary of responses below	
	<p><i>Sponsor provided a summary of responses on Appendix 12 V2 showing 11 responses and an additional separate email response from NATS during the engagement period making a total of 12 responses. 11 of the responses received showed operators welcomed the change and its purpose and were either supportive due to the fuel/flight savings or indifferent to the change. Clarification was sought from 1 of the stakeholders on the distribution of mail/stakeholders contacted which was responded to the satisfaction of the stakeholder concerned. Feedback at meetings showed that stakeholders understand that the ACP will result in no change to the lateral or vertical position of aircraft (below 7,000ft) arriving at or departing from EMA and are content with the approach taken.</i></p>	



B.2	APPROACH	
B.2.1	Did the change sponsor engage stakeholders in a suitable way?	YES
	<p><i>Yes, the change sponsor engaged stakeholders in a suitable way and shared their approach as outlined in the engagement strategy V1 document. The strategy outlined how EMA maintains regular dialogue with stakeholders, particularly those using or living near the airport. Engagement was via a circulated email, hybrid meetings, and similar forums. One round of engagement occurred over 42 days, during which emails were sent to all affected stakeholders.</i></p> <p><i>While the original statement of need focused on truncating rather than replacing the DTY 3N/4P SIDS, MAG clarified in their V2 strategy document that they would address this change in title and description at future stakeholder meetings. A clarification question was raised by the CAA on when and how MAG would update stakeholders on these changes. In response, MAG reiterated that EMA maintains ongoing dialogue with stakeholders, including regular meetings with the Consultative Committee (and its sub-groups), as well as the twice-yearly PLG sessions. These "business as usual" meetings, along with interactions with local councillors and ad hoc discussions with airlines, will be the platform for communicating updates.</i></p>	
B.2.2	What steps did the change sponsor take to encourage stakeholders to engage in the consultation?	
	<ul style="list-style-type: none"> <li><i>The change sponsor states that they maintained dialogue with stakeholders through quarterly meetings of the Independent Consultative Committee (ICC), bi-monthly sessions with the Airlines Operators Committee, and twice-yearly meetings of the Pilot Liaison Group (PLG). They also had regular meetings with local councillors and occasional discussions with airlines.</i></li> <li><i>Since mid-2023, sponsor has reported to the ICC and participated in their Monitoring, Environment, Noise, and Track (MENT) sub-committee meetings. Evidence of minutes has been provided to support this activity.</i></li> <li><i>At the April 2024 PLG meeting, stakeholders were informed of the proposal and its rationale. MAG explained that they had already used these forums to discuss the intent of the ACP and assured that updates would continue through these groups. As a result of ongoing engagement on the FASI ACPs, an up-to-date stakeholder list of relevant operational parties was developed.</i></li> <li><i>MAG also shared that they supplemented their presentation to the Pilot Technical Group with direct emails to airlines operating from EMA, inviting feedback and questions.</i></li> <li><i>Slides were presented to Parish Councillors on the Parish Engagement Forum on 22<sup>nd</sup> April 24 (Appendix 15) and meeting minutes of the EMA six-monthly Forum meeting held on the 9<sup>th</sup> of July 2024 (Appendix 14).</i></li> <li><i>Sponsor followed up discussions with stakeholders with an email sent on the 16-05-2024 that gave a summary on the proposal. Sponsor used slides for presentations to aviation stakeholders (Appendix 8) and to community stakeholders such as ICC &amp; MENT Subcommittee (Appendix 9 and Appendix 13) during the engagement.</i></li> <li><i>On Wednesday 5th June 2024 an e-mail was sent advising NATMAC members of NERL's requested change to the ACP to extend the Upper ATS Route UY53 to match Y53 between SAPCO and DTY. According to sponsor, this email also acted as a useful prompt to</i></li> </ul>	

	<p><i>stakeholders of the initial email and that their 'window' for response was closing. However, this email doesn't indicate closing window for engagement, is undated and doesn't show recipients or address other stakeholders other than NATMAC.</i></p> <ul style="list-style-type: none"> <li><i>MAG later in its submission mentioned that they met with the Parish Forum in September 2024 and have upcoming Consultative Committee and MENT sub-group meetings coming up. They are also awaiting confirmation of a November PLG meeting date. MAG assured the CAA that they will provide stakeholders with the latest information on the ACP during these sessions.</i></li> </ul>	
B.2.3	Was the change sponsor required to respond to any unexpected events and/or challenges?	NO
	<p><i>The sponsor did not mention any unexpected events and/or challenges, and none have been identified during the assessment of their submission.</i></p>	
B.3	MATERIALS	
B.3.1	What materials were used by the change sponsor during the consultation?	
	<p><i>Change sponsor did not share their materials with the CAA for comment in advance of conducting the engagement activity, however the materials clearly articulate what is being proposed and the impacts of the proposal.</i></p> <p><i>The sponsor's engagement materials shared with stakeholders included slides used in presentations;</i></p> <ul style="list-style-type: none"> <li><i>to aviation stakeholders (Appendix 8)</i></li> <li><i>community stakeholders (Appendix 9) MENT (Appendix 13) and Parish Forum stakeholders (Appendix 15)</i></li> </ul> <p><i>The slides provided details on the expected benefits of the proposal, the current airspace situation, the proposed changes, the potential impacts and how to participate.</i></p> <p><i>Sponsor followed up the initial discussions with stakeholders with an email that summarised the proposal.</i></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
	<p><i>The sponsor clearly set out their rationale for pursuing the ACP in their engagement document providing stakeholders with sufficient information to help them understand the current situation and determine what the likely impact of the preferred option would be on them if it was approved and implemented.</i></p>	
B.4	LENGTH	
B.4.1	Please confirm the start/end dates and the duration of the engagement below	

	<i>The engagement started on the 16<sup>th</sup> of May 2024 and closed on the 27<sup>th</sup> of June 2024. A duration of 42 days (6 weeks). Sponsor further stated that from engagement at PLG, the principal stakeholders had 64 days to respond.</i>	
B.4.2	What was the justification for the duration?	YES
	<i>The sponsor gave their rationale for the period in the engagement strategy highlighting that a 28-day AIRAC cycle is used in the industry to provide a reasonable margin for the stakeholders to comment, give feedback or a notice.</i>	
B.4.3	Was the period of engagement proportionate?	YES
	<i>Yes, based on sponsor's rationale, the scope and level of this ACP, the period of 42 days is acceptable and proportionate.</i>	
B.5	GENERAL	
B.5.1	Was the conduct of the engagement aligned with the engagement strategy?	YES
	<i>Yes, the engagement was completely aligned to the strategy and the sponsor did what they had said they would in the strategy.</i>	
B.5.2	Has the change sponsor correctly identified all the issues raised during the engagement and accurately captured them in the consultation response document?	YES
	<i>Yes, all issues have been correctly identified and accurately captured.</i>	
B.5.3	Does the summary of engagement detail the change sponsor's response to the identified issues? Is the change sponsor's response to the issues raised appropriate/adequate?	YES
	<p><i>The sponsor has summarised what stakeholders said on a 1 paged document known as 'Replies from stakeholders' found in appendix 12. Here sponsor has identified all the comments raised and responded appropriately.</i></p> <p><i>The appendices include details of engagement activities, presentation slides and materials, agendas and minutes, and email responses received as raw evidence by the sponsor to support the stakeholder engagement; -</i></p> <ul style="list-style-type: none"> <li><i>• 1 email sent on the 16<sup>th</sup> of May 2024 that summarised the proposal (Appendix 10).</i></li> <li><i>• 1 email to NATMAC members dated 5th June 2024 advising stakeholders of NERL's requested change to the ACP (Appendix 16)</i></li> <li><i>• 11 replies from stakeholders who replied with their comments that mainly support the proposal (Appendix 12)</i></li> <li><i>• 1 response from NATS supporting the change.</i></li> </ul> <p><i>West Atlantic UK Ltd requested confirmation that the new SIDs are planned to be regular RNAV SIDs like EGBB's COWLY 2Y and not GNSS required SIDs like EGSS's CLN 2E. MAG reassured the stakeholder that in the event of non-GNSS equipped aircraft being cleared on a RNAV substituted procedure or a total failure of the GNSS equipment onboard the aircraft, they would be able to continue to fly the procedures as per their coded overlays.</i></p>	




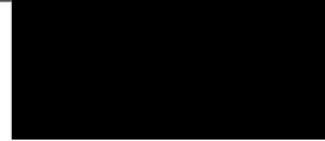


	<p><i>The rest of the evidence received showed operators welcomed the change and its purpose. The benefit derived will be dependent upon the flight/fuel planning of the operator which is often determined worldwide. Sponsor has also advised that feedback received at meetings showed that stakeholders understand that the ACP will result in no change to the lateral or vertical position of aircraft (below 7,000ft) arriving at or departing from EMA and are content with the approach taken.</i></p> <p><i>The original proposal apart from the alteration in title/description emphasising that the intention to finish the SIDs at SAPCO, engaged upon, remains unchanged.</i></p>	
B.5.4	Does the engagement response document detail the change sponsor's response to the identified issues?	YES
	<p><i>After reviewing the raw engagement response data, the CAA is satisfied that the sponsor has accurately captured all the feedback on the engagement response document.</i></p>	
B.5.5	Is the formal airspace change proposal aligned with the conclusions of the engagement response document?	YES
	<p><i>The sponsor identified the right audiences and provided a rationale for selecting them. He has also explained the approach used for engagement using emails and other forums as deemed necessary.</i></p> <p><i>Sponsor engaged for 6 weeks and has given a good rationale for pursuing this duration of engagement.</i></p> <p><i>For audit trail purposes sponsor has provided all raw evidence in terms of email correspondence which show that stakeholders are supportive to the proposal.</i></p>	
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?	YES
	<p><i>Public evidence session not required.</i></p>	
B.6	RECOMMENDATIONS/CONDITIONS/PIR DATA REQUIREMENTS	
B.6.1	Are there any Recommendations which the change sponsor <b><u>should try</u></b> to address either before or after implementation (if approved)? If yes, please list them below.	NO
	<p><i>None</i></p>	
B.6.2	Are there any Condition(s) which the change sponsor <b><u>must fulfil</u></b> either before or after implementation (if approved)? If yes, please list them below.	NO

	<p><b><u><i><b>GUIDANCE NOTE:</b></i></u></b> Conditions are something that the change sponsor <b><i>must fulfil</i></b> either before or after implementation, if indeed the airspace change proposal is approved. If their proposal is approved, change sponsors <b><i>must</i></b> observe any condition(s) contained within the regulatory decision; failure to do so <b><i>will usually</i></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>	
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.	NO
	<p><i>None, as a PIR is not required for this change.</i></p>	
	<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>	

PART C – Engagement Assessment Conclusion(s)		
C.1	Does the engagement meet the CAA's regulatory requirements, the Government's guidance principles for consultation and the Secretary of State's Air Navigation Guidance, and the identified engagement requirements for this level 3 permanent airspace change?	YES
	<p><i>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. I am satisfied that these principles have been applied by the change sponsor during the engagement. I am also satisfied that the change sponsor has conducted this engagement in accordance with the requirements of CAP 1616.</i></p>	



PART D – Consultation Assessment sign-off			
	Name	Signature	Date
Consultation assessment completed by Airspace Regulator (Engagement and Consultation)			30/09/24
Consultation assessment conclusions approved by Principal Airspace Regulator			09/12/2024