

# Project Palamon: Progress Update - February 2023

Issue 2 – 23 February 2023



**NATS**

## Context

In response to the CAA's Final Decision on Project Palamon (CAP2100)<sup>1</sup>, and as recommended by the CAA, we committed to provide six-monthly updates on the actions being progressed to address the seven recommendations set out in the Final Decision. This is the third update to the CAA.

## Summary of Progress

In its formal response to the CAA (August 2021), NERL committed to increase staffing resilience of services within the London Terminal Manoeuvring Area (TMA), by increasing both the headcount and number of validations held by controllers and to identify ways to deploy them in a more flexible manner and to train them more efficiently; this update sets out the good progress that has been made on these areas. NERL has also provided an updated staffing resilience plan (January 2023) including an updated view of supply and demand. Swanwick Airspace Improvement Project - Airspace Deployment 6 (SAIP AD6) was delivered as planned on 24 February 2022; although it is too early for a formal Post Implementation Review (PIR), through the summer of 2022 the change appears to have achieved the aim of safely increasing airspace capacity to better service demand to traffic operating at London Luton and London Stansted airports. Our commitment to engage effectively with customers continues. NERL is now reporting service performance outcomes on a quarterly basis, including performance against the Oberon indicators. NERL has made good progress on the accepted recommendations as detailed below.

## Update on the Recommendations

### 1. Staffing Resilience

Our training programme continues to deliver both new controllers and additional validations into Terminal Control (TC) Approach. As of the end of December 2022, the number of validations supporting the approach control functions of the London airports (compared to summer 2019) were: Heathrow 42 (43), Gatwick 36 (30), Stansted 36 (26), Luton 32 (24) and London City 28 (31). These validations are held across 121 controllers, a c.6% increase from summer 2019.

We have continued to develop initiatives under the themes of training efficiency and flexible deployment of resource. The sections below outline key progress since our last update and should be read in conjunction with NERL's latest staffing resilience plan published in January 2023:

<sup>1</sup> CAA, Investigation under s.34 of the Transport Act 2000: Project Palamon – Final Decision, 25th February 2021

## Training efficiency

Our Part Task Trainer (PTT – lower fidelity simulation) at Swanwick continues to be utilised for both initial and extension training across the unit. With greater traffic stability however compared to the volumes experienced during Covid-19, demand for this facility for these ends has since reduced. The PTT is still a key delivery tool to support our operational staff and is currently aiding the delivery of the West Airspace Project ahead of early 2023 deployment.

We continue, as per our August 2022 update, to develop requirements for investment in training and simulator capability to reduce dependency on the live environment. This remains part of our NR23 business plan and we await the CAA's final determination.

Training is ongoing for the initial cohort jointly training for initial validations on both Stansted and Luton, following the successful implementation of AD6. The benefits targeted by this changed approach were outlined in previous updates. This initial cohort are currently in the early phases of "on-the-job" training in the live environment and are forecast to achieve their initial validations in Q3 2023. Feedback received from trainees and the operational teams will be used to modify the approach to the delivery of future Unit Endorsement Courses (UECs) for Stansted and Luton (earliest opportunity currently early 2024) to ensure we maximise the potential of this approach.

## Flexible Deployment of Resource: Standardisation of Procedures

Work has continued to standardise and simplify the procedures for operating the Approach functions. This had been identified as beneficial for enabling controllers to train for additional sector validations more easily.

We noted in our last update the conclusion of initial consultations with Heathrow and London City and proposals made to Stansted. Due to the availability of suitably qualified staff at Stansted tower, we have been unable to progress this work in 2022. There has however been a commitment made to do this in the early months of 2023, with a view to agreed changes being progressed before the summer. Within the work undertaken to prepare for Gatwick returning to NATS, the unit specific instructions contained within their MATS Part 2 were reviewed. These were generally aligned with TC Approach. A few minor changes were identified and proposed, and these will be progressed when their resourcing permits. Liaison with Luton tower began in the autumn 2022 and opportunities are in the process of being agreed and progressed.

A significant area of alignment has concerned the handling of Visual Flight Rules (VFR) crossing traffic which has varied across the different units and had been identified by our training teams as one of the most challenging aspects of cross training the approach sectors. Agreement has been reached to align Luton's procedures with the current procedures that have proven to work well with Gatwick. We plan to introduce the same procedures with Stansted tower and those discussions are currently taking place. This consistency will be of benefit to TC controllers who hold more than one approach validation.

The second phase of this work, once the standardisation and simplification between individual airports and TC has completed, will be drawing the common procedures together into one section of the MATS Part 2. This has begun and the intention is to further progress this common section once all alignment changes through our consultations have been implemented. This is being targeted for completion by March 2024.

## Flexible Deployment of Resource: Operational staff deployment

As noted in our previous update, a portfolio of activities is being prioritised across the business to provide further mitigation for both supply and demand side risk in the coming years across the NERL operation.

These activities have continued to mature and now have two main areas of focus:

1. Short term actions for resilience in summer 23, but with benefits that will deliver throughout NR23. These include requesting double the monthly minima of attendances during the summer from those controllers whose primary role is non-operational but retain operational validations and returning time-bound flexible working contracts to full-time working during the summer peak months.

2. Longer term activities that we are exploring:

- a. changes to the way that we deploy operational staff both into the operation and to service non-operational activities, to make our supply more agile to meet fluctuations in both demands
- b. external recruitment of experienced controllers has begun, supplementing the supply of controllers we are delivering through training. As part of a first phase of recruitment, employment offers have been accepted by 6 external controllers as well as 3 from Western Radar. The resource market for UK rated ATCOs is severely limited, and is particularly difficult since Brexit. We are therefore working with the CAA to develop a UK approach to allow ATC licences issued by some non-UK nations to be recognised in the UK. This will allow us access to a significantly larger recruitment pool, and hence expand our ability to quickly recruit skilled and experienced ATCO staff.
- c. further transformation of the ATCO training process designed to deliver new ATCOs into the operation faster and with improved success rates
- d. how we can better support retention by providing greater flexibility to those ATCOs who are considering their transition to retirement, such as through reduced night shifts and flexible working options including moves to non-operational activities

As material benefits are realised for the resilience of our operational ATCO workforce, they will be shared through these updates.

## 2. Airspace Change

As reported in the previous Palamon Report update, the airspace change associated to the Swanwick Airspace Improvement Project, Airspace Deployment 6 (AD6), was implemented into operation on 24<sup>th</sup> February 2022. Since then, the change has embedded into routine operation and has provided benefit to the London Terminal Control air traffic management operation through the remaining months of 2022. From a Terminal Control operations perspective, the change has delivered its primary objective of reducing the complexity of the operation in support of both London Luton and London Stansted Airport arrivals through the segregation of their arrival flightpaths and the establishment of a new dedicated hold for London Luton Airport. The new London Luton Airport Hold complements the two original shared holds which now solely support London Stansted Airport arrivals. Notwithstanding the significant impact of COVID-19 on traffic demand in 2020 and 2021, the delay attributed to the TC Essex region, due to all causes, between the years 2019 and 2022 was as follows;

- 2019: 48,637 minutes;

- 2020: 8,824 minutes;
- 2021: 231 minutes, and;
- 2022: 0 minutes.

To fulfil the Airspace Change Process (CAP 1616), both London Luton Airport and NATS En Route Limited (NERL), as joint sponsors of the AD6 Airspace Change Proposal (ACP), are currently conducting data collection and analysis to support the final stage (Stage 7) of CAP1616, the Post Implementation Review (PIR). The data collection was planned to continue until the end of May this year, but the CAA have recently requested an extension until September 2023 which will be followed by a period of collation & analysis and then submission to the CAA. The CAA will then consider the submission and publish their outcome. The PIR is conducted at a minimum 12 months following the implementation of the airspace change. Given the PIR is a formal submission to the Civil Aviation Authority for assessment as to whether the main aims and expectations of the consultation and the ACP have been fulfilled then it is determined, for consistency, that the PIR outcome will provide the formal determination of the effectiveness of the change and will be reported in summary at the next appropriate Palamon Report update after the PIR assessment is concluded.

Further airspace change in the region post the AD6 change continues to be the focus of the programme delivering the Future Airspace Strategy Implementation (FASI). NERL is working closely with all airport sponsors to develop design options aiming to: *i.* modernise UK airspace and deliver benefit, i.e., reduced CO<sub>2</sub> emissions per flight; and *ii.* more efficient operations to accommodate future demand. This wider programme of lower-level airspace change that is focussed on supporting operations within the main Terminal Manoeuvring Areas in Scotland and across the Manchester and London regions is overseen by the Airspace Change Organising Group (ACOG) to support delivery of the jointly sponsored CAA and DfT's Airspace Modernisation Strategy. Initial planning activities indicate these larger scale changes are likely to deliver in the late 2020s and early 2030s. All sponsors of airspace change in this wider programme are still required to conduct activities and fulfil the obligations required of the CAP1616 process.

Given the reduction in delay seen in the TC Essex region since the implementation of AD6 and the existence of the Future Airspace Strategy Implementation programme and its oversight by the CAA and DfT, we will close Recommendation 2. This does not mean we will stop considering this airspace for development, but reflects the business as usual processes in place that regularly review all parts of our airspace.

### 3. Engagement with Stakeholders

NERL is keen to engage pro-actively and transparently with our customers and stakeholders and does this using a number of formal and informal channels, and the main channels are outlined below.

We continue to hold bilateral conversations with all airlines who are willing and able to meet, and through a busy and volatile year, NERL have used the appropriate engagement method for the relevant conversations. Where face-to-face meetings have been possible, we have done so and this has included taking opportunities to meet with international customers as they transit the UK. This has allowed NERL to reconnect with individual customers and focus on more strategic, longer term conversations, while still benefiting from the immediate and accessible nature of virtual customer engagement for more routine or tactical issues. NERL recognise the value of each approach and deploys a hybrid customer engagement management plan utilising face-to-face and virtual forums as appropriate.

With regard multilateral forums, NERL continues to engage with customers to identify the right time to re-integrate effective multilateral forums to raise, identify and discuss necessary areas for collaboration.

NERL continues to facilitate monthly customer look ahead calls with positive feedback on the value of bringing together key information in a single forum to inform strategic decisions for the month ahead.

With the importance of adequate reflection on summer 2022 and preparation for summer 2023, it has been agreed that the Operational Partnership Agreement (OPA) and Airspace & Flight Efficiency Partnership (AFEP) multilateral forums will take place, in person, in March 2023. To ensure these forums remain fit for purpose, a review of the Terms of Reference will be conducted to ensure they are the most efficient and effective use of resources for all parties involved.

NERL continues to explore the ability of providing customers with 'on-demand' access to appropriate customer specific data. A trial is being established with an airline to test the functionality and security of providing external access to a specific subset of NERL data. Once this trial has been proven NERL will expand the user access to this data which will deliver efficiency savings for NERL while also providing continuous access for customers to key performance data which is currently delivered via email and limited to the periodic nature of the reporting.

NERL has recently undertaken its annual customer satisfaction survey, reflecting on 2022. The results of this survey, along with the planned response to customer feedback, will be shared with customers.

Within the survey, we ask for feedback on our customer engagement, specifically asking our customers how they feel about our "Proactive engagement and provision of relevant and timely responses to queries". The feedback survey is structured such that our customers provide two quantitative responses, on a scale of 1 to 10.

- How important is this to your business?
- How well do NATS deliver this?

Then we provide a free text box for any supporting commentary.

We are in the process of drawing this year's survey to a close and the current indications are very positive, showing that proactive engagement remains important to our customers with an average score of 8.97 and they give our delivery an average score of 9.17. We believe these are extremely

encouraging results, with both scores showing an increase from the previous year, reflecting the continued and improved strength of our customer engagement.

The supporting comments provided by our airline customers, help emphasise the strength of feeling across the breadth of our customer base. The sentiment in these messages is something we are very proud of, and equally pleasing is the fact that the feedback is consistent across many different carriers, sizes of operations, geographic locations etc.

Along with the specific question referenced above, we also asked our customers to share with us any areas where they believe we could improve our customer engagement by asking the following "Is there anything that you feel is missing or could be improved from the customer engagement experience you receive from NATS?" We received some useful insights into how we can improve and we will look to put these into action in the near future. However, the most common theme in responses to this question was positive reinforcement of what we're currently doing.

On the strength of these results, the re-starting of our face to face OPA and AFEP meetings and in the knowledge that we have regular processes for reviewing and improving our customer engagement we will close the recommendation.

#### 4. Coding of Air Traffic Control Delay

NERL continues to follow the requirements within the Eurocontrol Network Manager (NM) Air Traffic Flow and Capacity Management (ATFCM) Operations Manual. We monitor our delay code attribution internally on a weekly basis and all delay codes are assessed for accuracy by Eurocontrol. In addition to the published performance report (Condition 11), NERL will offer an increased frequency of updates for delay attribution through the customer engagement opportunities described in our response to Recommendation 3. The monthly look-ahead will be the mechanism for the review of general delay attribution events and the airline specific bi-lateral meetings will provide delay attribution information for individual airlines.

During summer 2022, NERL participated in a trial conducted by the Performance Review Committee (PRC) to introduce two new delay codes. The PRC have published their findings in a Technical note<sup>2</sup>, where NERL provided the most extensive data set than any other ANSP.

The results of the trial were as NERL expected. A high percentage of delay attributed to capacity would have been attributed to the new "J" code, which captures capacity delays that could, in theory, be resolved by splitting the delayed sectors with the use of additional staff. The original capacity "C" code would then be used to capture the delay in elemental sectors only, where additional staff has no impact.

NERL does not support the use of the "K" code where adverse weather has further decreased capacity in a collapsed sector. The technical note uses the term, "Weather affected by staffing," which we believe to be misleading. As an example, the results for NERL London TC indicate that most of the weather delays would be attributed to the new "K" code on the basis that more sectors could be opened if staff were available. NERL experienced minimal staffing challenges in London TC during summer 2022, therefore the sector opening provided was sufficient to meet the demand. It cannot be assumed that opening more sectors would have improved the weather delays, particularly considering that opening more sectors in London TC during weather events may not be the safest solution, even if more staff were to be available. It can be preferable to use available staff as co-ordinators rather than opening extra sectors, which is not recognised by this process.

NERL accepts that the new codes provide transparency of regulating elemental sectors separately from collapsed sectors. It still does not, however, take into account the complexity of UK airspace, the ability for NERL to dynamically adjust sector opening to the traffic demand, or consider that maximum sector opening is not necessarily the most efficient way to manage the airspace.

NERL will continue to follow the current requirements within the Eurocontrol ATFCM Operations Manual until such a time when the new codes may be incorporated into the document and communicated to ANSPs with guidance on the consistent application in both the tactical and post-operational analysis phases.

<sup>2</sup> Technical Note - PRC trial with ANSPs to improve transparency in ATFCM operations | Aviation Intelligence Unit Portal ([ansperformance.eu](https://ansperformance.eu))



## 5. Sector information to Eurocontrol

NERL continues to meet the objective of this recommendation. NERL provides the information required by Eurocontrol Network Manager (NM) in the format it requests, and on a timely basis, to support NM activities.

We have recently established a high level Business to Business (B2B) connection with Eurocontrol to receive data from the Network Manager. This is the first step towards being able to exchange data with NM and provide dynamic sector opening information in line with the iNM digital transformation programme over the coming years.

## 6. Performance Data

Closed in last report.

## 7. Reporting on Resilience Planning

This third issue of our six-monthly reports meets part of the CAA's recommendation 7, to report on progress in maintaining a resilient service through adequate supply of operational staff across our network, as well as on steps to enhance airspace capacity and to engage more effectively with airline customers and airports on operational performance. We meet other parts of the recommendation in the updated staffing resilience plan, produced on an annual cycle, and most recently issued in January 2023.

In addition to this reporting, we have engaged closely with airline customers and airports during 2022 in developing and consulting on our business plan for the NR23 regulatory period 2023-27 in addition to the six-monthly Service and Investment Plan (SIP) consultation, with progress reports in the intervening quarters. This includes presenting evidence on the projected range of demand for en route service, versus the projected range of supply, as well as implications of traffic levels and the scale and pace of capital investment for service outcomes (in terms of delay and flight path efficiency).

The list below shows, in chronological order, where we have shared and discussed our staffing plans with customers since the issue of the Palamon Decision in February 2021:

- i. Palamon Decision Response (August 2021);
- ii. NR23 business plan prospectus and consultation (Autumn 2021)
- iii. Staff Resilience Plan Issue 1 (January 2022),
- iv. Palamon Update #1 (February 2022);
- v. NR23 Business plan submission (February 2022)
- vi. Palamon Update #2 (August 2022);
- vii. NERL response to CAA's Initial Proposals for NR23 (December 2022)
- viii. Staff Resilience Plan Issue 2 (end January 2023)

Over the last 18 months, much of the consultation on staffing has been through the NR23 process, and as that process is drawing to a conclusion, we will consider how and where it is best to continue that engagement.