Project Palamon:
Progress Update - August 2022

Issue 1.0 − 15 August 2022

Context

In response to the CAA's Final Decision on Project Palamon (CAP2100)[1], 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 second 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 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. Airspace Deployment 6 (AD6) was delivered as planned on 24 February 2022; although it is too early for a formal Post Implementation Review, anecdotally, the change has 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, including improvements to the multilateral "customer look-ahead calls" to facilitate the two-way sharing of information. These calls include the review of general delay attribution events, with delay attribution for individual airspace progressed on a bilateral basis. NERL is now reporting service performance outcomes on a quarterly basis, including performance against the Oberon indicators. NERL remains on track to provide the updated staffing resilience plan in January 2023, which will take into account the feedback received from the CAA, airlines and airport stakeholders on earlier iterations and will provide an updated view of supply and demand. NERL has made good progress on the accepted recommendations as detailed below.

Update on the Recommendations

1.   Staffing Resilience

The composition of returning traffic is being closely monitored to understand if and where there may be material differences following the pandemic that require a corresponding change to our resource planning to maintain targeted performance. Given this uncertainty, as we have entered our first busy summer since 2019 and in line with the clear priority expressed by our customers during the NR23 consultation, we are prioritising staffing resilience in the operation. Given the general levels of disruption across the aviation supply chain, both in the UK and across the rest of Europe, this is creating significant volatility in the presentation of traffic within each day, which in turn increases the challenge of optimally balancing supply.

Our training programme continues to deliver both new controllers and additional validations into Terminal Control (TC) Approach. As of the end of July 2022, the number of validations

---

[1] CAA, Investigation under s.34 of the Transport Act 2000: Project Palamon – Final Decision, 25th February 2021

supporting the approach control functions of the London airports (compared to Summer 2019) were: Heathrow 43 (43), Gatwick 35 (30), Stansted 36 (26), Luton 32 (24) and London City 30 (31). In terms of outturn performance over the last few months, the proportion of NERL attributable delay attributed to TC staffing is much lower than during 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:

Training efficiency

We noted in our February update that we had enhanced our Part Task Trainer (PTT − lower fidelity simulation) at Swanwick and this had been supporting extension training during the very low traffic volumes with Covid-19. This is continuing to support and provide additional capacity for extension training across the approach sectors in TC and has now also been expanded to support training delivery in Area Control (AC).

We are continuing to develop requirements for investment in training and simulator capability to reduce dependency on the live environment. This would further assure the ability of the training 'pipeline' to deliver sufficient valid controllers into our operation, to provide greater agility to adapt our supply to meet material changes in traffic, and to potentially reduce the duration and cost per trainee. We have included this project within our NR23 business plan.

In our previous update we noted that the opportunity was being explored to jointly train Stansted and Luton approach as initial validations for *ab initio* controllers following the implementation of AD6. A joint Unit Endorsement Course (UEC) commenced in May. As briefed in our February update and included here for reference, the targeted benefits for gaining both validations at the same time include:

- Increased resilience immediately upon validation.
- Reduced future training demand, as extension training for the second validation will no longer be required.
- Reduced overall training time, due to the co-located nature of the sectors and the greater understanding of the wider task that undertaking training on both concurrently should provide.
- Greater assured and more flexible training delivery, with a wider pool of on-the-job training instructors (OJTIs) available with both sectors being trained.

Progress against these benefits will be monitored as the trainees advance to "on-the-job" training in the live environment and towards achieving validation which is forecast in Q3 2023 for this cohort.

Flexible Deployment of Resource: Standardisation of Procedures

In our February update, we outlined work underway to standardise and where possible 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.

Meetings have now been held with NATS representatives at Heathrow, Stansted and London City. Both Heathrow and London City were happy that there were no significant differences and any minor alterations that are required (which are more akin to editorial updates in the way that information is presented) will be done when the capacity of the respective teams allows.

Following a workshop with Stansted, they are reviewing and considering our proposals where alignment opportunities were identified, and we await their response.

As well as continuing to progress with Stansted, the focus in the coming months will be to undertake reviews with Luton and Gatwick. Our aim remains to conclude the overall process by the end of the year.

Flexible Deployment of Resource: Operational staff deployment

As noted in our Staffing Resilience Plan, our objective is to manage supply to the level required to achieve the target service performance. As forecasts evolve and certainty emerges both prior to and during NR23, our resource planning processes will identify adjustments to address shortfalls or surpluses against the optimum. We intend to continue to engage with customers through the Service and Investment Plan (SIP) process on the evolution of traffic and associated service implications.

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, including more flexible arrangements to bolster our operational workforce with ATCOs whose main role is outside of the operation, for example in training or supporting airspace changes.

2. Airspace Change

Following the CAA's approval of the Airspace Change Proposal (ACP) in support of AD6, NERL completed the Operational Conversion Training and associated transition activities in line with the project plan, resulting in a successful implementation on 24th February 2022.

During the whole transition period, lasting for 20 days after implementation, only 220 minutes of delay were generated as a consequence of applying a regulation to the flow of air traffic through that region to ensure safe operations whilst the changes became embedded.

The transition went smoothly with only a small number of flight planning anomalies surfacing during the first few days of operation. NERL has continued to engage with London Luton Airport and its customers operating in the new airspace in order to support briefings and help improve airline flight planning and fuel management practices.

Whilst it is too early yet to conduct any meaningful post implementation review of the change, the operation has adapted well to the revised operating arrangements. Anecdotally, the intended operational benefits from the change are being observed due to the establishment of a dedicated hold for London Luton Airport simplifying the management of both London Luton and London Stansted arrivals in the vicinity of the airports.

Since the introduction of AD6, daily and weekly traffic levels have not yet risen to those experienced during Summer 2019. Nevertheless, the design is regularly tested due to the frequent 'bunching' of arrival flights. This concentration of flights is being managed far more effectively with the new airspace design compared with the previous arrangements it replaced.

By separating the streams of London Luton and London Stansted arrivals, especially from the east, holding for either airport has been virtually non-existent since implementation. On those days when

holding has been required, including an occasion when a runway was unavailable due to blockage for more than two hours, the AD6 design mitigated the impact of this as the aircraft holding for London Luton were completely separate from the inbounds to London Stansted and so the latter flows were unaffected and could land without any delay. This reflects the increased resilience across the operation as a benefit of the change.

The operations teams are also reporting reduced operational complexity especially in the previous TC Essex region, now Stansted Radar, and in turn this has provided operational safety improvements.

So far the change is proving effective in reducing operational complexity and with significantly reduced delay attribution in the region compared to 2019 operations.

A formal Post Implementation Review will be initiated in Q1 2023 to assess the overall impact of change. NERL plans to share the findings with the CAA and other stakeholders via existing consultation and communication processes, such as the Service and Investment Plan.

It is proposed that once the AD6 Post Implementation Review is completed, and assuming the outcome of the review is positive, that this Recommendation should be considered closed.

Any future airspace development in the region will be managed and progressed as an integral part of the Future Airspace Strategy Implementation Programme.

3.   Engagement with Stakeholders

Following the re-introduction of monthly "customer look ahead calls", NERL has continued to evolve the effectiveness of these sessions by enhancing the information available and including additional input from Eurocontrol NM on the broader network picture for greater context. Feedback from these sessions remains positive and they are recognised as a key part of NERL's engagement with airlines. They provide a single, regular forum for the sharing and discussion of key ATM, airline and airport issues relating to the month ahead. To complement the forward-looking nature of these calls, NERL has also introduced a retrospective look back at the service performance for the year to date to provide greater transparency and context on service performance. The data presented during these calls are published by NERL for its customers on the Customer Gateway website.

NERL continues to conduct more frequent bi-lateral meetings with airline customers, taking advantage of the opportunity provided through virtual meetings. Additionally, over the past six months NERL has been able to re-introduce face-to-face engagement activity with airline customers, when appropriate. NERL recognises that while the virtual meeting platform has provided many benefits, it does not replace the value of a meeting in person. As this is now more achievable, NERL has conducted in person sessions with Ryanair, British Airways, jetBlue and American Airlines. Some sessions planned with other airlines have had to be cancelled at short notice due to emerging operational pressures as flying activity has stepped up over spring and summer.

NERL has undertaken a review of the possibility of re-introducing multi-lateral forums to bring together the airline community on key topics at in-person events. Feedback from airlines has indicated that there is currently insufficient appetite and/or ability for them to support such an event, but we will continue to test the requirement and appetite for a such an event in the future.

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.

This summer, we are participating in a trial with the Performance Review Commission, which is assessing the introduction of new delay codes. The trial is due to conclude in the Autumn, and we anticipate being able to provide more information later in the year.

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 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

NERL reports performance data, including Oberon indicators within its quarterly Condition 11 report, as agreed with the CAA. This reporting will continue and forms part of the annual service standards statement consultation with customers and agreement with the CAA. Therefore, it is proposed that further updates against this recommendation are not necessary and this recommendation can now be closed.

7.   Reporting on Resilience Planning

This second 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 will meet other parts of the recommendation in the updated staffing resilience plan, produced on an annual cycle, with the next version scheduled for January 2023. In producing that document, we will take account of feedback from the CAA and from airline and airport stakeholders on previous iterations of the staffing resilience plan.

In addition to this reporting, we have engaged closely with airline customers and airports during 2021 in developing and consulting on our business plan for the NR23 regulatory period 2023-27. This includes presenting evidence on the projected range of demand for en route service as traffic levels are forecast to recover, 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). We have also discussed with customers options for investing in more simulator training capacity, to enhance the agility of our operational training for ATCOs and thereby enable us to respond more quickly to emerging demands across the UK ATM network. Further supporting evidence on these issues is presented as part of our NR23 business plan submission.