Project Palamon:
Progress Update - August 2025

22 August 2025

Table of Contents

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 through to 2025 on the actions being progressed to address the eight recommendations set out in the Final Decision. This is our last planned update to the CAA, although we remain ready to respond to any further questions arising on the topics addressed by the Palamon investigation.

Summary of Progress

In its response to the recommendations of the CAA's Palamon investigation (August 2021), NATS (En Route) PLC (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 progress that has been made in these areas.

Our training programme has delivered an increase in controllers and validations, specifically a 10% increase in validations and 3% increase in controllers since summer 2019.

We have agreed with the CAA additional reporting in the quarterly Condition 11 report as part of the Service Standards Statement Consultation for 2024 onwards. This new delay coding proposal is now part of our regular Service Standard Statement reporting. The details of the new air traffic control delay coding are reported in Section 4 of this document.

---

[1] CAA (2021), Investigation under s.34 of the Transport Act 2000: Project Palamon – Final Decision, CAP 2100

Update on the Recommendations

1   Staffing Resilience

Summary

Our training programme continues to deliver new controllers and additional validations into Terminal Control (TC) Approach. At the end of July 2025, the number of validations supporting the approach control functions of the London airports [compared to summer 2019] were: Heathrow 37 [43], Gatwick 35 [30], Stansted 35 [26], Luton 31 [24] and London City 30 [31]. These validations are held across 118 valid controllers. Together, this amounts to a 10% increase in validations and a 3% increase in controllers since summer 2019.

These figures are the month-end snapshot before the submission of the Palamon progress report. Additional Approach validations are forecast for the coming months and are outlined in the training efficiency section below. Our operational supply versus demand forecasting for TC, which we share as part of the NERL ATC Staffing Resilience plan, models our supply in the Heathrow and non-Heathrow Approach functions as sufficient for the combined demand for the remaining years of NR23.

In addition to maintaining an increased headcount and validations, we have continued to enhance resilience by developing initiatives related to training efficiency and flexible resource deployment.

Please see below for further details on our progress since February 2025.

Training efficiency

We are forecasting several extension validations for existing controllers in the coming months. This includes 1 Luton validation in August and 2 Gatwick validations in September. We also expect a number of students to validate as new ATCOs in Spring 2026.

NATS has continued progressing the work with the CAA and the DfT to recognise non-UK Civil ATC licences. The DfT intends to put the amended legislation before Parliament late 2025 and workshops are planned throughout this year to engage industry stakeholders and share the CAA's proposed process.

Flexible Deployment of Resource: Operational staff deployment

Following our February 2025 update, we continue to apply our additional attendances agreement. This agreement benefits NATS with provisions to further target requests for additional attendances to specific validations/timeframes where required. It also enhances options that existed to provide flexibility to change agreed shifts. Between January and July 2025, this agreement has provided 540 additional shifts. This approach to securing the right level of operational resource to meet peak summer demand has been necessary as NERL restores its full training capacity following the necessary halt during the pandemic years, and before the flow of validated ATCOs into the operation reaches the level needed for the medium term.

Improvements continue to be prioritised across the business to further mitigate supply and demand risk across NERL operations in the coming years. We continue to explore:

- changing the way, 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 sources of demand
- further transformation of the ATCO training process designed to deliver new ATCOs into the operation with improved success rates.

Several of these mitigations require detailed engagement with the Prospect trade union, which remains ongoing. We will report on benefits realised in future editions of the staffing resilience plan.

2. Airspace Change

Closed in Update 3 – February 2023.

3. Engagement with Stakeholders

Closed in Update 3 – February 2023.

4. Coding of Air Traffic Control Delay

Engagement with Eurocontrol Network Manager, other ANSPs and airlines representatives has continued through attendance at the Delay Code Working Group. The proposal will be made to NETOPS on 15 October 2025.

The latest proposal is as follows (albeit not agreed yet by all stakeholders):

- J Code. Demand exceeds, or complexity reduces ATC capacity, where an increase of planned staffing could have mitigated the delay. A reason for the capacity reduction should be provided in the ANM remark, e.g., Structural Staffing, Traffic shift.
- S Code. An unplanned staff shortage reduces capacity after the pre-tactical plan has been finalised. e.g. Late Sickness.
- C Code. Demand exceeds or complexity reduces ATC capacity, where an increase of planned staffing could not have mitigated the delay. A reason for the capacity reduction should be provided in the ANM remark, e.g., Traffic Shift.

The working group will further debate and amend this proposal and, if approved by NETOPS, will continue through the governance approval at NDOP and NMB with a recommended implementation date.

Post-operational delay reporting

In the NR23 Provisional Decision, the CAA recommended the use of delay codes proposed by the Eurocontrol Performance Review Commission (PRC). These codes, however, have not yet been adopted by the Network Manager and are not available for selection on application of regulations.

We reached agreement with the CAA to provide additional reporting in the quarterly Condition 11 report as part of the Service Standards Statement Consultation from 2024 onwards. This new delay reporting provides further transparency on capacity delay (CE) and weather delay (WE) and is now part of our regular Service Standard Statement reporting.

5. Sector information to Eurocontrol

As reported in our last update, NERL continues to meet the objective of this recommendation.

NERL continues to provide the information required by Eurocontrol Network Manager (NM) in the format it requests, and on a timely basis, to support NM activities.

We maintain 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 Update 2 – August 2022.

7.   Reporting on Resilience Planning

This last issue of our six-monthly reports meets part of the CAA's recommendation 7, to report through to 2025 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.

In addition to this reporting, we engaged closely with airline customers and airports during 2021 in developing and consulting on our business plan for the NR23 regulatory period 2023-27, and subsequently on our evolving investment portfolio via 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)
   ix.   Palamon update #3 (February 2023)
    x.   NERL Condition 5 Certificate 2R 2023 (June 2023).
   xi.   Palamon update #4 (August 2023)
  xii.   Staff Resilience Plan Issue 3 (end January 2024)
 xiii.   Service and Investment Plan (SIP) consultation (January 2024)
 xiv.   Palamon update #5 (February 2024)
  xv.   Service and Investment Plan (SIP) consultation (June 2024)
 xvi.   Palamon update #6 (August 2024)
 xvii.   NERL Portfolio Update (October 2024)
xviii.   NATS Airspace and Flight Efficiency Partnership (AFEP) Meeting (November 2024)
 xix.   NERL Service and Investment Plan (SIP25) consultation (December 2024)
  xx.   Palamon update #7 (February 2025)
 xxi.   Service and Investment Plan (SIP) consultation (July 2025)

This is the last planned update report in response to the CAA's recommendations in the Palamon investigation. However, our customer engagements on similar resilience topics will continue via our regular SIP consultation.