**ACP-2020-092**

**INCLUSION OF FJA INTO UK AIP**

**STAGE 3A**

**CONSULTATION STRATEGY**

**V2.1**



**Responsible Authors of this Document**

The Sponsor for this Airspace Change Proposal is the Ministry of Defence (Mod). The project team is drawn from the Joint Training Exercise Plans Staff (JTEPS).

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Only responsible authors may implement amendments via the Project lead. All revisions will be listed and detailed in the table below.

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| **Revision**  **Number** | **Affected part** | **Revised By** | **Notes** |
| V1.0 |  | Project Lead | Initial Issue. |
| V2.0 | 1.3.1 NATMAC stakeholder list match Stage 1 & 2 for consistency.  1.3.2 Additional Stakeholders added due to proximity of neighbouring airspace and local Spaceport Stakeholders with ACP submissions.  2.8 Consultation dates altered due to CAA review.  4.1 Consultation period mitigations added due to Christmas and New Year period.  4.2 Consultation date altered.  5.4 Consultation dates altered.  All – Removal of the military parlance ‘kinetic & non kinetic’. | Project Lead | Amendments after CAA Gateway Review. |
| V2.1 | 2.2.2 ‘FAQ’ added to copies of docs.  3.2 Wording altered for clarity on how to request hard copies.  3.4 Link to the Citizen Space Portal added for clarity.  3.5 Wording altered for clarity on how to request hard copies.  All – Date of Consultation changed to 7th December 2022 | Project Lead | Amendments after CAA Gateway Review. |

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**Introduction**

This document forms part of Stage 3 of the Airspace Change Proposal ACP-2020-092, which seeks to secure suitable segregated airspace to use during Exercise Joint Warrior (Ex JW). A highly complex, multi-domain collective training exercise, preparing aircrews for operational service hosted twice annually – Spring and Autumn.

In order to meet the complex training objectives of Defence during Ex JW, segregated airspace is required that is:

* Within reach of Navy Forces, more specifically a Carrier Strike Group (with embarked 5th generation air systems) operating within Deep Water, which through the development of the scenario is likely to span hundreds of miles.
* Provides a sufficient mixture of overland and overseas areas which offers exercise planners flexibility to create more complex scenarios across both environments, for necessary littoral operations.
* Crucially caters for ranges within the area, which allows for necessary Air-Land integration.
* Is of large enough size to accommodate representative operational numbers. In order for UK Danger Areas to comply with both the UK’s Airspace Modernisation Strategy and Free Route Airspace (FRA), every danger area requires a “parent” danger area in the UK AIP in order for Flight Buffer Zones to be applied and thus enable FRA. In an increasingly busy UK airspace, segregated airspace of a large enough size and in a suitable location will not exist after FRA is implemented and current solutions are untenable to deliver the required needs of Defence.

The CAA accepted the Sponsor’s submission at the Stage 2 ‘DEVELOP AND ASSESS’ Gateway on 31st May 2022 and redacted versions of all submission documentation can be found on the portal[[1]](#footnote-2).

The aim of this document is to demonstrate to the CAA a comprehensive consultation strategy that satisfies the requirement for detailed consultation as part of stage 3 of the CAP1616 airspace change process. This consultation strategy forms part of a wider submission that will be send to the CAA before the Stage 3 ‘CONSULT’ Gateway that is planned for 25 Nov 22.

CAP 1616 provides ‘best practice consultation principles and a foundation format for this document. It will include the following chapters:

* **Summary of engagement activity undertaken to date.** This section will summarise all engagement that has been conducted throughout Stage 1 and 2.
* **Audience.** This will outline the stakeholders already identified based on their impact (either positive or negative) or perceived interest in the proposal.
* **Approach**. This will detail the methods the Sponsor will use to inform stakeholders and provide a timeline of consultation activities. It will also outline how the Sponsor will contingency plan for unexpected events.
* **Materials.** This will detail what products will be created to enable stakeholders to provide informed responses. Specifically, it will outline the different materials that are to be developed in order to make the information as assessable to a range of audiences.
* **Length.** This section will propose the start and end of the consultation period.

**Objectives**

The objectives of this consultation strategy will be primarily guided by the Gunning Principles. The Gunning Principles are principles that set out the legal expectations surrounding formal consultation. The Cabinet Office Consultation Principles 2018 will also feed into the approach and materials used for this strategy.

The four Gunning Principles for effective consultation are:

1. Consultation should occur when proposals are at a formative stage.
2. The consultation should give sufficient reasons for any proposal to permit intelligent consideration.
3. The consultation should allow adequate time for consideration and response.
4. The product of consultation must be conscientiously taken into account.

The Sponsor is seeking to meet all of these principles when developing the consultation strategy. The MOD is seeking to maintain a dialogue with all stakeholders identified to date whilst ensuring that any new stakeholders are able to fully understand the proposal in order to ensure meaningful feedback is gathered.

The following high-level objectives will underpin the development of the consultation strategy:

* Material must be as accessible as possible for all category of stakeholder. This includes different types of material as well as different methods of delivery and dissemination (physical or virtual).
* Information is presented in a jargon-free way and is accessible to both aviation professionals and the general public alike.
* Consultation is long enough to ensure that all stakeholders have had a chance to respond. This is particularly pertinent for organisations who may meet irregularly and will not be able to respond quickly.

These principles will ensure that consultation is thorough, reaches the correct audience and employs the correct methods of consultation to generate valuable contributions that will aid in the development of the proposal.

Additionally, the Sponsor has used the most up-to-date and credible data available within the consultation documentation. This includes open source electronic conspicuity data and the latest CAA aeronautical charts.

**Summary of Engagement Activity Undertaken to Date**

Engagement has been undertaken throughout Stage 1 and 2 of this ACP. The table below summarises the activity to date. Each document referenced can be found by clicking on the appropriate hyperlink:

|  |  |
| --- | --- |
| **ACP Stage** | **Engagement Activity Summary** |
| 1A | A [SoN](https://airspacechange.caa.co.uk/documents/download/3402) was submitted to the CAA and uploaded to the Portal. The SoN articulates the requirement to facilitate the re-introduction of the FJAs and was repeated on documents in Stage 2 to ensure any new stakeholders were made aware. |
| The minutes of the [ASSESSMENT MEETING](https://airspacechange.caa.co.uk/documents/download/3824) between the Sponsor and the CAA were uploaded to the Portal. The assessment meeting is to allow the Sponsor and CAA to discuss the SoN and consider whether or not the proposal falls within the CAP 1616 formal airspace change process. |
| 1B | Stage 1B saw the Sponsor propose and then engage on a set of [DESIGN PRINCIPLES](https://airspacechange.caa.co.uk/documents/download/3840) (DPs). The purpose of the DPs are to agree a criteria that airspace design options must be judged against. The draft DPs were sent to stakeholders and feedback sought. A [meeting](https://airspacechange.caa.co.uk/documents/download/3859) post submission was held between the Sponsor, NATS and DAATM prior to releasing [V2.0 of the DPs](https://airspacechange.caa.co.uk/documents/download/3877). |
| 2A | Stage 2A saw the development and assessment of several airspace change options. Engagement was sought on the initial options in the [OPTIONS DEVELOPMENT](https://airspacechange.caa.co.uk/documents/download/4482) documentation which was sent to stakeholders for comment. An [ENGAGEMENT SUMMARY](https://airspacechange.caa.co.uk/documents/download/4484) document was also included outlining the engagement methods, stakeholder identification and justification for a proportional engagement period. |
| Additionally, all options developed were then qualitatively assessed in the [DESIGN PRINCIPLE EVALUATION](https://airspacechange.caa.co.uk/documents/download/4485) which was uploaded to the Portal before commencement of Stage 2B. |
| 2B | As part of Stage 2B the Sponsor compiled a document set that formed part of the [OPTIONS APPRAISAL](https://airspacechange.caa.co.uk/documents/download/4487). This included an Environmental Assessment and Safety Assessment. This appraisal then assessed the airspace option against a baseline ‘do nothing’ situation and outlined the relative differences in impact on each option (both positive and negative).  Subsequently, an [INITIAL OPTIONS APPRAISAL ASSESSMENT](https://airspacechange.caa.co.uk/documents/download/4550) was then released by the CAA. |

**Section 1 – Audience**

1.1 A comprehensive list of stakeholders were identified at Stage 1 of the ACP. As the ACP has progressed a number of other aviation and local community stakeholders have been added. The Sponsor intends to conduct consultation primarily with this set of stakeholders. This list is the most up-to-date available and has been expanded at each stage as new stakeholders have been identified.

1.2 Additionally, the Sponsor will conduct wider consultation with the general public, principally through the use of Citizen Space and the CAA Airspace Change Portal. Further detail can be found in Section 2.

1.3 Stakeholders have been broken down into the following groups below:

**1.3.1 NATMAC**. NATMAC *‘assists the Safety and Airspace Regulation Group (SARG) in the development of airspace policies, configurations and procedures in order that due attention is given to the diverse requirements of all users of United Kingdom airspace, civil and military’*. As a non-statutory advisory body sponsored by SARG, the National Air Traffic Management Committee will be consulted in order for views at a national level to be captured. Additionally, there was an assumption that NATMAC organisations, as national over-arching bodies, would cascade information to representatives at an appropriate level as they saw fit.

|  |  |  |
| --- | --- | --- |
| **NATMAC** | | |
| Airlines UK | Airspace4All | Airport Operators   Association |
| Airfield Operators Group | Aircraft Owners and Pilots Association | Airspace Change   Organising Group |
| Association of Remotely Piloted Aircraft Systems UK | Aviation Environment Federation | British Airways |
| BAe Systems | British Airline Pilots Association | British Balloon and Airship Club |
| British Business and   General Aviation   Association | British Gliding Association | British Helicopter   Association |
| British Hang Gliding and Paragliding Association | British Microlight Aircraft Association | General Aviation Safety Council |
| British Model Flying Association | British Skydiving | Drone Major |
| General Aviation Alliance | Guild of Air Traffic Control Officers | Honourable Company of Air Pilots |
| Helicopter Club of Great Britain | Heavy Airlines | Iprosurv |
| Isle of Man CAA | Light Aircraft Association | Low Fare Airlines |
| Military Aviation Authority | NATS | PPL/IR (Europe) |
| QinetiQ | United States Air Force Europe |  |

**1.3.2 Additional Stakeholders.** Due to the proximity of neighbouring airspace to the FJAs, the Scottish Upper Area (North) in fig 1, the addition of the following airspace users will be added as stakeholders:

|  |  |  |
| --- | --- | --- |
| Deeside Gliding Club (Aboyne) | The Scottish Gliding Centre (Portmoak) | The Highland Gliding Club (Easterton) |
| Cairngorm Gliding Club (Feshiebridge) |  |  |

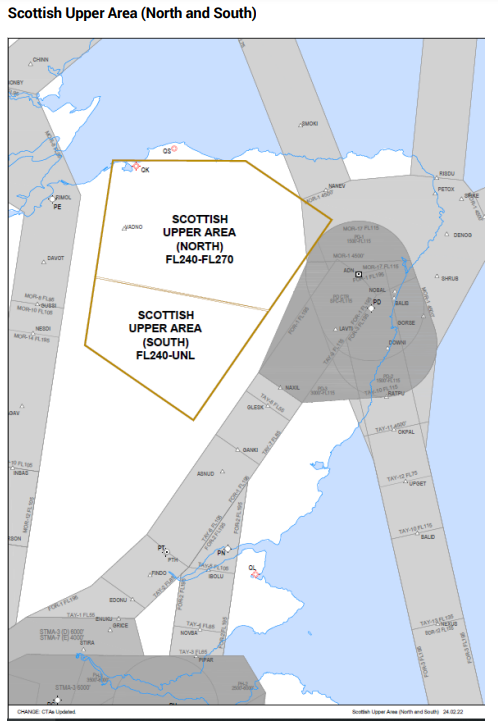


Fig 1 – Scottish Upper Areas

Additionally since Stage 2, Spaceport Stakeholders have been identified from the following ACP submissions and have been included:

[ACP-2017-79](https://airspacechange.caa.co.uk/PublicProposalArea?pID=92) – Shetland Space Centre Satellite Vertical Launch Safety Area

[ACP-2019-04](https://airspacechange.caa.co.uk/PublicProposalArea?pID=125) – Space Hub Sutherland

[ACP-2021-012](https://airspacechange.caa.co.uk/PublicProposalArea?pID=344) – Spaceport 1 Scolpaig North Uist

[ACP-2021-058](https://airspacechange.caa.co.uk/PublicProposalArea?pID=402) – HyImpulse Sounding Rocket Launch from Saxa Vord Spaceport - Shetland

|  |  |  |
| --- | --- | --- |
| Highlands and islands Enterprise | Hylmpulse | Shetland Space Centre |
| QinetiQ |  |  |

**1.3.3 Internal MOD stakeholders.** MOD stakeholders were identified by Defence Airspace and Air Traffic Management (DAATM) through the Military Airspace Users Working Group (MAUWG) contact list.

|  |  |  |
| --- | --- | --- |
| **Internal MoD Stakeholders (\*via DAATM)** | | |
| HQ 1 Group\* | HQ 2 Group\* | 11 Gp A7\* |
| 19 Sqn\* | 78 Sqn\* | 2 Group DAAM\* |
| Military Aviation Authority  (MAA) | Defence Airspace and Air Traffic Management (DAATM) | Navy Command HQ |

**Section 2 – Approach**

**Notification of Consultation**

2.1 The overarching aim of the Sponsor is to ensure that all impacted stakeholders are able to suitably participate in consultation. Notification of consultation will be varied, utilising various electronic means as well as physical publications, in order to reach a maximum number of potentially interested parties (including those without internet access). This broad approach of notification aims to meet the intent of CAP1616 and the requirement to include seldom-heard groups in consultation[[2]](#footnote-3).

2.2 The following methods of notification will be applied:

2.2.1 Existing stakeholders will be notified of consultation via email following a successful CONSULT gateway. This email will inform stakeholders of the consultation material, start and finish dates as well as the methods of responding. Additionally, reminders will be sent to existing stakeholders post new year break (3rd January 2023) as well as two weeks prior to the consultation end date.

2.2.2 Stakeholders that cannot be reached by email will be written to with copies of the Consultation Document, Consultation Full Options Appraisal (Phase II) and FAQ, and sent a reminder post new year break (3rd January 2023) as well as 2 weeks prior to the consultation end date.

**Methods of Consultation**

2.3 As a Level M2 (which is anticipated either not to affect civil operations or not to affect civil operations such that the distribution of traffic changes below 7,000 feet) there is no requirement to consult with communities. The consultation strategy will therefore employ a variety of consultation methods with stakeholders. This will include:

2.3.1 Online consultation. This will be the primary consultation method. Targeted emails and written publications will all direct stakeholders to the Citizen Space portal in order to read/distribute the consultation material and respond.

2.3.2 Virtual consultation. If requested by the stakeholders, a number of virtual meetings would be held throughout the consultation period. This is aimed primarily at NATMAC organisations and MoD stakeholders in order to cater for geographic locations and/or potential group discussion. Virtual meetings can be set up by emailing or writing to the change sponsor as per para 2.4. These will be held on weekday.

2.4 Consultation responses will be encouraged through email (address below) in order to collate and manage however a written method of submitting responses will also be offered:

* Email: [air-fastjetareasproposal@mod.gov.uk](mailto:air-fastjetareasproposal@mod.gov.uk)
* Letter: FAO: Sqn Ldr Steve Blakemore

JTEPS

The Old Iron Foundry

6 Queen Street

HMNB Portsmouth

PO1 3HL

**Contingency Planning**

2.5 The predominant contingency to plan against is a resurgence in COVID-19. With recent relaxation in the rules and abolition of laws surrounding the pandemic it is hoped that the consultation could receive significantly more uptake by planning physical consultation – However, with corporate guidelines making some workspaces COVID-19 secure, it is still preferred to maintain online consultation/virtual meetings where possible.

2.6 Should it be deemed that the consultation has either not provided the Sponsor with appropriate material or stakeholders sufficient opportunity to respond a contingency plan will be enacted to extend the consultation period and conduct additional meetings in order to generate the required feedback. This plan will be enacted in consultation with the CAA.

2.7 Any unexpected events or challenges throughout the consultation period will also lead to an extended consultation period to facilitate additional virtual events.

**Consultation Timeline**

2.8 The consultation timeline can be found below. Dates are based on the proposed start-date of Wednesday 7th December 2022, making sure they have sufficient time to receive and, if necessary, promulgate material to others before commencing direct consultation. Virtual events will be arranged and planned should stakeholders require them up until the Consultation end date.

Reminder Email/Letter

**3 Jan 23**

Christmas

Break

**23 Dec 22 –**

**2 Jan 23**

Consultation

Start

**7 Dec 22**

Reminder Email/Letter

**2 Feb 23**

Consultation

Ends

**24 Feb 23**

Virtual Consultation Window

**Section 3 – Material**

**Consultation Documentation**

3.1 The following documentation will be presented for stakeholders to read:

* Frequently Asked Questions. Available on Citizen Space, the FAQ section will aim to answer both aviation-specific questions as well as address general themes received during previous engagement. This will be a separate document that will be updated as required throughout the consultation period should trends begin to develop with feedback questions.
* Consultation Document. The main document will provide a more comprehensive breakdown of both airspace options as well as background information on the ACP. It will also include a glossary of terms.
* Full Options Appraisal Phase II (FOA). As part of the Stage 3 gateway the Sponsor will produce a FOA. This will be available for consultees to read should they wish to read more technical detail.

Should stakeholders wish to make or receive FAQ representation offline, they can do so by writing to the change sponsor direct at the details laid out in para 2.4.

**Soft Copies**

3.2 The initial consultation email to stakeholders will include links to the Citizen Space online portal as well as include soft copies of the consultation documents laid out in para 3.1.

**Online Portal**

3.3 Citizen Space (located [here](https://consultations.airspacechange.co.uk/mod/inclusion-of-fja-into-uk-aip/)) will be the primary method of providing online ‘soft copy’ material to stakeholders. It will host all material outlined above and include an online feedback form. It will also provide a link to the CAA Airspace Change Portal to allow stakeholders to refer to Stage 1 and 2 documentation.

**Physical Material**

3.4 Hard copies of all consultation documentation will be available by request for stakeholders unable to access the online material within the Citizen Space portal located [here](https://consultations.airspacechange.co.uk/mod/inclusion-of-fja-into-uk-aip/). All documentation will include a hard copy of the feedback form and can be returned by post to the address outlined at para 2.4.

3.5 Requests for hard copies are to be made via the email address or by post address outlined at para 2.4. Hard copies will then be sent by post. The process for requesting hard copies will also be outlined in the launch email and on the Citizen Space Portal.

**Section 4 – Length of Consultation**

4.1 The Sponsor will look to conduct a 12-week consultation as a result of a number of factors with potential impact over the Christmas and New Year period:

* Previous engagement has identified that some stakeholders hold meetings on a monthly basis thereby limiting the opportunities for organisations to formally discuss the proposal as a collective.
* Owing to the upcoming Christmas holidays, a 12-week consultation will ensure all stakeholders have had sufficient time to receive documentation, attend a consultation event (if desired) and respond.
* The FJAs were extant up until Dec 2021. The majority of impacted stakeholders for the airspace, FL245 and above, will have already operated with them active within UK airspace.
* Stakeholders have been engaged from the beginning of the proposal (August 2021), with positive feedback being received.
* Survey responses will be reviewed post Christmas and New Year period (~6 working days). Reminders to stakeholders will be sent on Tuesday 3rd January 2023 and another Thursday 2nd February (3 weeks prior to consultation ending).

4.2 Therefore it is the intent of the Sponsor to start consultation as soon as is practicable from the CONSULT gateway. In order to provide a short period of time post-Gateway decision for any minor rectification the Sponsor would like to propose a consultation period **from Wednesday 7th December 2022 to Friday 24th February 2023.**

**Section 5 – Post-Consultation**

**Collate and review responses**

5.1 On completion of consultation the Sponsor will review all responses and categorise for analysis. As with previous engagement feedback responses will be categorised into responses directly relating to the ACP and more general feedback that does not.

5.2 All original responses will be analysed and sent to the CAA with a redacted version uploaded to the Portal (including raw data).

**Stage 4 – Update and Submit**

5.3 The Sponsor will consider whether, in light of feedback received during consultation, airspace design options need significant re-design that would warrant further consultation with stakeholders.

5.4 Provided additional consultation is not required the Sponsor will begin to draft the final submission to the CAA for submission prior to 17th March 2023 as part of Stage 4. This is in order to comply with the timeline agreed with the DECIDE gateway planned for the 2nd June 2023.

|  |  |  |
| --- | --- | --- |
| Stage/Step | Description | Gateway Date |
| 3B | CONSULT Gateway | 5th December 2022 |
| 3C | Consultation Launch | 7th December 2022 |
|  | Reminder to Stakeholders | 3rd January 2023 |
|  | Reminder to Stakeholders | 2nd February 2023 |
| 3D | Collate and review responses from consultation. | 24th February 2023 |
| 4A | Update design | 3rd March 2023 |
| 4B | Submit Airspace Proposal to the CAA | 17th March 2023 |
| 5 | DECIDE Gateway | 2nd June 2023 |
| 6 | IMPLEMENT into AIRAC 09/2023 | 9th June 2023 |

1. [Airspace change proposal public view (caa.co.uk)](https://airspacechange.caa.co.uk/PublicProposalArea?pID=319) [↑](#footnote-ref-2)
2. [CAP1616 Page 49, Para 167](https://publicapps.caa.co.uk/docs/33/CAA_Airspace%20Change%20Doc_Mar2021.pdf) [↑](#footnote-ref-3)