

Cotswold Airport (Kemble) Airspace Change Proposal for a Defined Approach Procedure



Consultation Strategy
CAP 1616 - Step 3a

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Key References:

- A. Kemble Stage 2, Step 2a- Design Options [for engagement].
- B. Stage 2, Step 2a – Post Engagement Options Design Principle Evaluation
- C. Stage 2, Step 2a – Post Engagement Options Design Principle Evaluation Document Review.
- D. Stage 2, Step 2b – Options Appraisal (Phase 1 Initial)
- E. Civil Aviation Authority CAP 1616, 2nd Edition– Airspace Design dated Nov 2018.
- F. Department for Transport - Air Navigation Guidance 2017 dated Oct 2017.
- G. Department for Transport – TAG Unit A3 – Environmental Impact Appraisal dated Dec 2015.
- H. Summary of Stage 2a Engagement Feedback.
- I. Cotswold Area of Outstanding Natural Beauty Management Plan 2018-2023.
- J. Civil Aviation Authority CAP 1524 - Information on aviation’s environmental Impact dated 2017.
- K. Stage 3, Step 3b – Consultation Strategy
- L. Cabinet Office Consultation Principles 2018
- M. The Gunning Principles

STEP 3A – CONSULTATION STRATEGY

INTRODUCTION

1 Cotswold Airport (Kemble) is currently working through its Airspace Change Proposal following the CAA’s CAP1616 ACP process. It embarked on this project in November 2017 and over time has progressed through a number of Gateways as evidenced on the CAA Portal. <https://airspacechange.caa.co.uk>

1.2 Entering the key Consultation phase will afford all identified stakeholders, and members of the wider public who become aware, to familiarise themselves with the proposal, understand effects if any on them and express their opinions concerning new PBN approaches to runways 08 and 26. It will allow Cotswold Airport to gather information and to understand views about the effect of the proposals. In turn, we hope consultees will provide relevant and timely feedback to us though we appreciate there may be differing views between various stakeholder groups.

1.3 This consultation strategy document details how Cotswold Airport has assessed the needs for effective airspace change consultation and decided upon ways to best achieve this; it should be read with the Consultation Document and the Full Options Appraisal. The structure and content of this document is guided by the following:

- a) CAP1616 Stage 3, Step 3a paras 150 to 165 and Appendix C, in particular C30 to C32 including Table C1: Best practice consultation principles.
- b) Cabinet Office Consultation Principles, and
- c) The Gunning Principles.

These two Principles are attached in the Appendices.

1.4 Since the start of Cotswold Airport’s project in 2017 to introduce defined approaches to both ends of the runway, a clear policy of engagement has been adopted. This wasn’t novel as the airport’s management already had well-established lines of communications with many of the people and organisations that now form the core target

audience of this consultation. By reference to both the Cabinet Office and Gunning Principles it can be seen that Cotswold Airport unconsciously met all those relevant principles, which has resulted in the sound basis for consultation using the strategy outlined below.

2 Objectives

2.1 CAP 1616 states in Appendix C Consultation and Engagement at C32 - *“The fundamental principles of effective consultation 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’s development.”*

2.2 Cotswold Airport recognises the importance of this and has decided its objective is to hold a stakeholder consultation. It does not intend to garner the feedback of the general public, just those stakeholders it has identified. [See Appendix E]

2.3 Cotswold Airport are seeking a dialogue with stakeholders allowing the widest opportunity for responses having given them as much information as possible upon which to base their comments or preferences concerning the options presented. Cotswold Airport will gather views and understand respondents’ feelings about the proposals by providing consultees with easy ways to give meaningful feedback within the time allowed.

2.4 As noted elsewhere, two important guiding principles from the Cabinet Office and Case Law have proved invaluable and appear throughout the document. Due consideration of this guidance has led strategy development and Cabinet Office principles B, D, F and G figure prominently in the following proposal.¹ CAP1616 Appendix C Table C1 has also informed how we will tailor the consultation.

2.3 The companion Consultation Document available via the CAA Consultation website, <https://consultations.caa.co.uk> has been designed to help to ensure ACP consultation documentation/material is presented in an open, fair and transparent manner, easily understandable by both the general public and aviation professionals alike. It will help all stakeholders to understand clearly and assess the likely effect on them with enough time to clarify any misunderstandings before responding with their opinions within the consultation period. It will give clear guidance how everyone who wishes to will be able to respond.

3 Summary of Engagement Activity Undertaken to Date

3.1 This section highlights some key activities undertaken following the CAA’s Assessment meeting held in June 2018 at which the Statement of Need was accepted.

3.2 The first action was to brief community leaders from local Parish Councils who arranged for copy, written by Cotswold Airport, to be included within printed Parish Magazines. Further meetings were held to garner their opinions on a number of Design Principles which some ranked in order of their own priorities. Key to ensuring full consultation, which will include this group, is non-digital communications. At present plans cover a number of printed options and channels to be discussed below.

¹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/691383/Consultation_Principles_1_.pdf

3.3 Turning to aviation-specific groups, an Open Day was held at the Control Tower on Thursday 9th August 2018 to which all existing contacts were invited. A number of those attending expressed opinions about the proposals but left matters at that. Apart from those, excellent dialogue followed especially with the glider clubs nearby and RAF Brize Norton ATC. Both will be important parts of the consultation and we expect a number of responses through the official channel. The gliding community proved most willing to engage and the Design Principles and Options were shaped as a result of their input.

3.4 Through the CAA's National Air Traffic Management Advisory Committee (NATMAC), Cotswold Airport reached out to engage with everyone on that committee; our strategy will include them again and direct contact where possible during the consultation will be made to encourage responses. Furthermore, meetings and phone conversations have also taken place with RAF Brize Norton, RAF Fairford, Swindon Borough Council and the proprietor of Cloudbase Paragliding based at Redlands Aerodrome (since closed). Bristol Airport ATC again whilst welcoming took no further part in the process.

3.5 In order to have something to discuss with stakeholders, without suggesting a solution, broad areas were depicted overlaying a map of the Cotswolds. These areas indicated where aircraft currently lined up on each runway direction and highlighted the fact that arrivals came from both the north and south before turning onto final approach. As discussions progressed with the Gliding Community it became clear that any defined routes that moved aircraft towards gliding sites at Nymphsfield and Aston Down would be problematic and so these comments were fed into the very first options appraisal.

3.6 The Cotswold Area of Outstanding Natural Beauty (AONB) sits beneath some of the possible routes which may become defined. In a series of conversations, it became clear that plans to regularise such routes, thus reducing the random scatter currently seen, supports their own AONB Management Plan.

3.7 During the planning phase for engagement, when thinking about types of audiences, Cotswold Airport recognised the need to consider people who may not be aware of aviation matters perhaps because of their distance from the airport. However, the very low density of population surrounding Cotswold Airport, the small number of movements envisaged and existing background levels of activity from many other players in the vicinity meant that identifying and pursuing everyone wouldn't yield benefits commensurate with the effort. Nevertheless, consultation will widen the level of engagement so far and enable all stakeholders to express their opinion. We will ask all stakeholders for their postcode within the survey questions to then better understand their opinions within a geographical context of the proposed approaches.

4 Audience

4.1 Cabinet Office Principle F states that '*Consultations should be targeted*' and Principle G that '*Consultations should take account of the groups being consulted.*' When considering the broad spectrum of people and organisations that are Cotswold Airport's audience the notion of winners and losers alluded to in that document was hard to envisage as Cotswold Airport had embarked upon the project with only positive benefits in mind; no one part of that audience spectrum was targeted to be negatively affected.

4.2 Aviation Stakeholders

4.2.1 As mentioned in para 3.4 this group were readily accessible being mostly based on site or operating close by. Although NATMAC will provide a ready means by which many aviation stakeholders can be informed, other groups will be contacted directly. Cotswold Airport is for instance a Corporate Member of AOPA and will use the LAA magazine, Flyer and Pilot Magazine (online and/or print versions) for press releases. The Target List can be found in Appendix E.

4.3 Non-Aviation Stakeholders including Seldom Heard Groups

4.3.1 Because of the nature of aircraft operations at Cotswold Airport, large and medium sized jet arrivals already conform to straight in approaches which take them over nearby local villages. It is believed these stakeholders would see minimal changes to our overall movements and in this context a comparatively minor increase in in-scope arrivals. The audience for engagement activities was already defined at Stage 1, step 1b Design Principles as evidenced in the Appendices and none of this existing audience will be discarded [Principle G]. In the earliest stages of engagement, we also identified audiences beyond first points of contact such as residents of local villages requiring extra effort to contact. The strategy includes residents under the final approach not connected to the internet who will be informed through local Parish councils.

4.4 Local Parish/District/County Councils and MPs

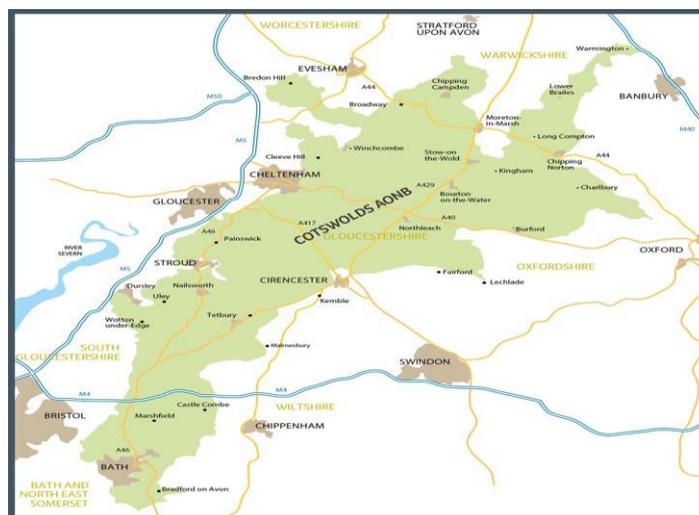
4.4.1 Regular meetings with Parish Councils have occurred for many years conducted in a spirit of openness and cooperation. The communities were engaged at a very early stage of this process and the parish councils kept abreast of our progress through CAP 1616 through email and telephone conversations.

4.4.2 A wider list of councils and authorities has been compiled. All will be contacted in advance, so they know about the consultation prior to its launch on the 10th February 2020. This will either be a full airport liaison meeting, their diaries allowing or via email to the chair and community liaison officer.

4.4.3 Lastly, the rise in importance of the All-Party Parliamentary Group on General Aviation (APPG-GA) previously spearheaded by the Right Honourable Grant Shapps, MP means this group has been added to the growing list. Now that the recent General Election is settled all local MPs with constituencies in the vicinity will also be consulted.

4.5 Nearby environmentally sensitive areas

4.5.1 The map below shows the boundary of the Cotswold Area of Outstanding Natural Beauty. It is the only known environmentally sensitive area lying under proposed routings and hence the Cotswold AONB management team will be consulted. Should any other organisation or location be identified these too will be consulted.



4.5.2 Along the way, new people and organisations have either become known or have made contact and these have been subsumed within the wider list for consultation [Principle F]. This list is attached in the Appendices.

5 Approach

5.1 Notification of consultation

5.1.1 This strategy has been developed to help ensure all consultees receive information in a way that suits them. Generally, this will be via email though printed media will be employed too.

5.1.2 Cotswold Airport will use the list of target consultees to make email contact in advance of the opening date for the consultation. In parallel, the online presence of both Flyer, LAA and Pilot magazine will be used to pass information to the aviation community and information will be placed on the Cotswold Airport website www.cotswoldairport.com/gnss which in turn will direct enquirers to the CAA Consultation website. The Airport's Facebook Page and Twitter account will also announce the ACP consultation start, with a weblink to the site. Printed material will be distributed via local Parish Councils. We will also place an announcement that the consultation is live within our AV8 restaurant, with a link to direct customers to the citizen space ACP portal.

5.2.3 Using these methods of communication will aim cover a very large number of the people and organisations Cotswold Airport has identified as being important to process. However, it is recognised that vigilance throughout the period will be required to identify gaps in coverage.

5.2 Access and response to consultation

5.2.1 All Consultation materials will be made available for stakeholders to download via Citizen Space through which the formal consultation will be undertaken. A questionnaire will be provided through Citizen Space through which responses to the consultation may be submitted. This will also be included for separate printing within the consultation document as a separate annex for Parish Councils. For those stakeholders that do not have access to the internet, a printable feedback form will be available on request from the consultation team for written responses to be returned to at:

Airspace Change Consultation Department
The Control Tower
Cotswold Airport
Kemble
Gloucestershire
GL7 6BA

5.2.2 During the Consultation it is expected the majority of feedback from stakeholders will be received through the CAA portal. When written responses are received these responses will be uploaded onto the portal. The CAA will publish the responses, moderated where necessary, each week and Cotswold Airport will offer answers to any queries if not covered by the FAQs. FAQs will be added to if patterns of questioning emerge.

5.3 Consultation monitoring

5.3.1 It's clear that there will be a ripple effect once the consultation period opens and that social media can and will play a part in broadening the audience base. Cotswold Airport has plans to participate across all platforms with agility to spread the message that an opportunity exists signposting the way into the Consultation Portal. Furthermore, staff will be on hand to answer phone calls, monitor social networks and emails during the consultation period as well as responding to comments on the portal as they arise. Cotswold Airport is confident that a wide an audience for the consultation has been identified with plans to suit each groups' preferred method on contact.

5.4 Risk of consultation failing

5.4.1 The risk of this consultation failing is thought to be driven by two main factors. Firstly, that we receive little or no responses. To mitigate this, a reminder will be sent out 30 days before the deadline and a final reminder 1 week prior to the consultation closing. Secondly, that within the first 4 weeks of the consultation period, stakeholders express a need for more time to consider the proposal.

5.4.2 Accounting for engagement so far, the relatively small size and impact of this proposal and that the stakeholder list remains the same as during engagement, the risk of failure is assessed as low to nil.

6 Materials

6.1 In terms of materials, CAP 1616, Appendix C, Table C1 has precisely shaped the Consultation Document. At only 23 pages it describes the proposal using a balanced combination of text and diagrams. This includes basic information about the effect of wind direction on aircraft take-off and landing with more detailed technical material accessed through hyperlinks. It has been designed for printed distribution where necessary and plans are in hand to make hard copies available for the local Parish Councils and where the public visit the Airport.

6.2 Cotswold Airport believes that many local residents living outside of the final approach track are interested in overflight and visual intrusion. As part of the 'What are we proposing' page, graphics showing the random scattering of aircraft routing in a sample period is compared and contrasted with the options. This is designed to help enable their comprehension without the need to understand air traffic control procedures and provide a clear 'Am I affected?' reference point. Also, a Frequently Asked Question bank is in course of preparation which will be available to stakeholders/consultees when viewing the consultation through the portal. The necessity to add to the bank in response to patterns of responses has been identified.

6.3 Visitors to Cotswold Airport are a regular day-to-day occurrence not only by pilots and their passengers but also members of the public. Cotswold Airport welcomes the public and provides an area from which to view activities along with catering facilities in the newly renovated and relaunched AV8 restaurant. An info point within the restaurant is planned which will provide people looking at it with an overview of the consultation and show how best to respond online though printed response forms will also be available.

7 Length of Consultation

7.1 The standard consultation period extends to 12 weeks but could be longer if certain circumstances prevail such as Christmas and New Year holidays. However, a shorter 8-week period is proposed in this case.

7.2 Cotswold Airport believes that most people likely to respond to a formal consultation request have been identified through engagement and pre-existing contacts. Due to the relatively small local populations, the level of engagement thus far, the small size and assessed impact of this proposals, we have opted to reduce the consultation period from the 12 weeks recommended in CAP 1616 to a scaled and proportionate 8 week period, commencing Monday 10th February 2020 and closing Monday 6 April 2020 and prior to the Easter Holidays (Starting on Good Friday, 10 April 2020)

7.3 To help ensure this length of consultation is appropriate a targeted communications plan will run contemporaneously encouraging stakeholders to respond as quickly as possible. A reminder will be sent out 30 days before the deadline and a final reminder 1 week prior to the consultation closing. The possibility of issues arising which may force an extension has been acknowledged. Should this occur, accounting for the Easter break will add additional extra time.

8 Post Consultation

8.1 Assessment and submission

8.1.1 After the consultation period closes, Cotswold Airport will collect, analyse and categorise all responses that have been received during the consultation for the CAA to approve its categorisation of those responses. Cotswold Airport will then confirm which design will be taken forward to the next stage of the process. Should it be required in light of feedback Cotswold Airport will update the design of the preferred option to account for feedback during consultation.

8.1.2 There is a remote possibility that a completely new option emerges. Should this happen Cotswold Airport will decide on its merits and discuss with the CAA whether this requires another consultation.

8.1.3 Cotswold Airport will then submit-

A. A Consultation Response Document setting out the approach to categorisation, the preferred option to be taken forward and any design changes resulting from consultation responses. This will be made available four weeks after closure.

B. The next stage of work, as described in the latest version of CAP 1616.

8.1.4 Cotswold Airport will continue to place all documents on the Portal once the CAA confirms the consultation is complete with no requirement for further work and inform consultees via email (or their preferred method of communications).

8.1.5 Cotswold Airport will submit its formal Airspace Change Proposal to the CAA.

8.1.6 Once the Formal submission has been submitted, CAA will notify The Department of Transport.

8.1.7 Cotswold Airport acknowledges that following the publication of a redacted version of the Sponsor's final proposal, any stakeholder may submit a 'call in' requesting that the final decision about these changes is made by the Secretary of State for Transport rather than the CAA. Stakeholders can review the airport's proposal to assess whether or not it meets any of the call-in criteria and have 28 days from the publication date of the redacted proposal.

8.2 Decision and implementation

8.2.1 Cotswold Airport wishes to make its approaches available before the end of 2020. With new guidance and direction from the DfT to CAA, the shorter Consultation period and better access to Gateway capacity the September AIRAC cycle has been identified to ensure notification achieves this goal.

8.3 Post Implementation and Reversion Capability

8.3.1 The CAA are required to start a Post Implementation Review (PIR) one year after the introduction of the new procedures. Cotswold Airport will cooperate fully with this assessment.

8.3.2 Cotswold Airport will highlight in the Consultation the reversibility of the change should the PIR indicate this is required. A reversion to the current method of operation for the approach to the Airport for In-scope aircraft may result in a temporary stop to using the approach developed in this proposal or even that the proposed approaches are withdrawn completely. In this instance, the airport will revert to its current operational methods.

9 Conclusion

9.1 Cotswold Airport has used best endeavours throughout this CAP1616 ACP to meet the Regulator's expectations. Arriving at this important milestone has taken an Herculean effort for the small team whilst managing a busy aerodrome. Hopefully, that effort and commitment to the process from first principles to this Gateway are reflected not only in this strategy document but all output submitted so far. When taken with the Full Appraisal and Consultation documents the Cotswold Airport believes this consultation will be properly launched, managed and reviewed.

Appendix A

Statement of Need (From Stage 1 of the CAP 1616 process)

Cotswold Airport (Kemble) is a large aerodrome 4.5 nm SW of Cirencester near RAF Fairford (10nm) and RAF Brize Norton (19nm). It is licensed by the CAA and an air traffic zone (ATZ) 2nm radius is established around it with an air traffic service (ATS) provided during notified hours by qualified aerodrome Flight Information Safety Officers (FISOs). Operations are limited due to the lack of ground-based navigation aids to Visual Meteorological Conditions (VMC) by day and, at certain times of the year, in the dark. The airfield logged 32,698 movements in 2017 which equates to a non-seasonally adjusted average of 2500 take-offs and landings per month, the majority of which are made by based general aviation (GA) light aircraft. Year on year increases of larger airliner aircraft, arriving for end of service recycling, and corporate/VVIP jet aircraft are changing the traffic mix; this trend is expected to continue as major stakeholders' business increases for inter alia airliner salvage, ongoing maintenance under an EASA approved Part 145 scheme and private flying.

Issue: Currently, without a defined instrument approach procedure (IAP), suitably equipped larger aircraft, including those operated by The Royal Flight, determine their own approach path onto either end of our runway 08/26 whilst flying under instrument flight rules (IFR) in poor weather and/or in the dark. Their crews rely on Air Traffic Control radar service from RAF Brize Norton to position them on to a visual final approach to the runway in use at Kemble. This generates an inherent safety risk, which without a defined approach cannot be fully mitigated.

Opportunity: Satellite technology managed by Europe and the USA, which provides GPS navigation freely available to all, can deliver internationally recognised all weather IAPs. Whilst these Signals in Space (SiS) can be used by many of our customers' aircraft with new technology equipment on board, to make good use, a design for IAPs has to be created, validated and published internationally. Defined IAPs would help enable greater regularity and enable existing mitigated risks to be reduced further to as low as reasonably practicable (ALARP). The route which inbound aircraft follow will be the same as at present but with greater accuracy laterally and vertically through improved descent angles thus bringing a new level of assurance to the approaches. Benefits including reducing the effect of noise on surrounding residents and the reduction in CO2 emissions will be published. This proposed change is not intended to significantly increase traffic, extend opening hours nor provide GPS instrument approach training.

Appendix B List of stakeholders

CAP 1616 Engagement - Stakeholder contact list. Developed from December 2017 to August 2018

Name	Appointment	Method of Engagement	Remarks
Other Local Aerodromes and Local Gliding Airfields			
Sqn Ldr	SATCO, RAF Brize Norton and Fairford	Meeting	Senior ATC Officer (inc Fairford)
Flt Lt	ATC, RAF Brize Norton	Meeting	ACP Sponser for RAF Brize Norton
Flt Sgt	ATC, RAF Brize Norton	Meeting	LOA Kemble/RAF Brize Norton
	Nympsfield Gliding Club	Open House	
	Aston Down - Cotswold Gliding Club	Email and Open House	
	Bristol Airport	Meeting	Operations, ATC Planning
	Bristol Airport	Meeting	GM NATS
	Oaksey Park Airfield	Open House	Airfield Manager
Local Communities/Councils/Parish Councils			
	Kemble Parish Council	Meeting	Costwold Airport Liasion Officer
	Kemble Parish Council	Meeting	Chair
	Crudwell Parish Council	Meeting	
	Gloucestershire County Council	Meeting	
	Cirencester District Council	Meeting	
General Public	All	Via Website and Open House	www.cotswoldairportapproach.com
	Ashley & Culkerton PC	Meeting	
Executive Jet or Helicopter Operators/ Cat D Aircraft			
	Starspeed	Meeting	
	CEO Air Salvage International	Meeting	
	GCAM Maintenance Manager	Meeting	
	Executive Jet operator pilot (based)	Email	
	Merlin Motorsport -Executive Jet Owner	Email	
Capt	Chief Pilot - Queens Helicopter Flight	Email	
Ops/Chief Pilot	Signum Aviation- Executive Jet Operator	Email	
	Volantair- Executive Jet Operator	Email	
Ops/Chief Pilot	Lux Aviation (Royal Flight)- Executive Jet Operator	Email	
Ops/Chief Pilot	Air Hamburg- Executive Jet Operator	Email	
Ops/Chief Pilot	Zenith Aviation- Executive Jet Operator	Email	
	Pilot - Quinnesette (PC12 Executive Jet)	Email	
	The little Jet Company- Executive Jet Operator	Email	
Ops/Chief Pilot	Xclusive Jets- Executive Jet Operator	Email	

Appendix C

The Cabinet Office Consultation Principles 2018

A. Consultations should be clear and concise

Use plain English and avoid acronyms. Be clear what questions you are asking and limit the number of questions to those that are necessary. Make them easy to understand and easy to answer. Avoid lengthy documents when possible and consider merging those on related topics.

B. Consultations should have a purpose

Do not consult for the sake of it. Ask departmental lawyers whether you have a legal duty to consult. Take consultation responses into account when taking policy forward. Consult about policies or implementation plans when the development of the policies or plans is at a formative stage. Do not ask questions about issues on which you already have a final view.

C. Consultations should be informative

Give enough information to ensure that those consulted understand the issues and can give informed responses. Include validated impact assessments of the costs and benefits of the options being considered when possible; this might be required where proposals have an impact on business or the voluntary sector.

D. Consultations are only part of a process of engagement

Consider whether informal iterative consultation is appropriate, using new digital tools and open, collaborative approaches. Consultation is not just about formal documents and responses. It is an on-going process.

E. Consultations should last for a proportionate amount of time

Judge the length of the consultation on the basis of legal advice and taking into account the nature and impact of the proposal. Consulting for too long will unnecessarily delay policy development. Consulting too quickly will not give enough time for consideration and will reduce the quality of responses.

F. Consultations should be targeted

Consider the full range of people, business and voluntary bodies affected by the policy, and whether representative groups exist. Consider targeting specific groups if appropriate. Ensure they are aware of the consultation and can access it. Consider how to tailor consultation to the needs and preferences of particular groups, such as older people, younger people or people with disabilities that may not respond to traditional consultation methods.

G. Consultations should take account of the groups being consulted

Consult stakeholders in a way that suits them. Charities may need more time to respond than businesses, for example. When the consultation spans all or part of a holiday period, consider how this may affect consultation and take appropriate mitigating action, such as prior discussion with key interested parties or extension of the consultation deadline beyond the holiday period.

H. Consultations should be agreed before publication

Seek collective agreement before publishing a written consultation, particularly when consulting on new policy proposals. Consultations should be published on gov.uk.

I. Consultation should facilitate scrutiny

Publish any response on the same page on gov.uk as the original consultation, and ensure it is clear when the government has responded to the consultation. Explain the responses that have been received from consultees and how these have informed the policy. State how many responses have been received.

J. Government responses to consultations should be published in a timely fashion

Publish responses within 12 weeks of the consultation or provide an explanation why this is not possible. Where consultation concerns a statutory instrument publish responses before or at the same time as the instrument is laid, except in very exceptional circumstances (and even then publish responses as soon as possible). Allow appropriate time between closing the consultation and implementing policy or legislation.

K. Consultation exercises should not generally be launched during local or national election periods.

If exceptional circumstances make a consultation absolutely essential (for example, for safeguarding public health), departments should seek advice from the Propriety and Ethics team in the Cabinet Office. This document does not have legal force and is subject to statutory and other legal requirements.

Appendix D

The Gunning Principles

The *Gunning* principles are that:

- (i) consultation must take place when the proposal is still at a formative stage;
- (ii) sufficient reasons must be put forward for the proposal to allow for intelligent consideration and response;
- (iii) adequate time must be given for consideration and response; and
- (iv) the product of consultation must be conscientiously taken into account.

BBAC - [REDACTED]
BBGA - [REDACTED]
BGA - [REDACTED]
BHA - [REDACTED]
BHPA - [REDACTED]
BMAA / GASCo - [REDACTED]
BMFA – [REDACTED]
BPA - [REDACTED]
Airspace4All - [REDACTED]
GAA - [REDACTED]
GATCO – [REDACTED]
HCAP - [REDACTED]
Heavy Airlines - [REDACTED]
Isle of Man - [REDACTED]
LAA - [REDACTED]
MAA - [REDACTED]
MoD DAATM - [REDACTED]
NATS - [REDACTED]
NATS – [REDACTED]
Navy Command HQ – [REDACTED]
PPL/IR – Group Mailbox
UKAB - [REDACTED]
UKFSC - [REDACTED]
USAFE (3rd AF-DOF) – [REDACTED]
Non-Aviation Stakeholders
Kemble Parish Council
Ashley & Culkerton Parish Council
Crudwell Parish Council
Gloucestershire County Council
Cirencester District Council
Swindon Borough Council
Cotswold Area of Outstanding Natural Beauty
Local Constituency MPs
[REDACTED] (Conservative) North Swindon
[REDACTED] (Conservative) South Swindon
[REDACTED] (Conservative) North Wiltshire
[REDACTED] (Conservative) Cheltenham
[REDACTED] (Conservative) The Cotswolds
[REDACTED] (Conservative) Stroud, the Valleys and Vale
[REDACTED] (Conservative) Gloucester
[REDACTED] (Conservative) Wantage
[REDACTED] (Conservative) Witney
All Party Parliamentary Group – General Aviation (APPG-GA)

Appendix F

Consultation Record Sheet

Consultee Details	Feedback & Date	Our Comments / Mitigation
Aviation Stakeholders		

Consultee Details	Feedback & Date	Our Comments / Mitigation
Parish, District & County Councils		

Consultee Details	Feedback & Date	Our Comments / Mitigation
Non-Aviation Stakeholders		

Consultee Details	Feedback & Date	Our Comments / Mitigation
MPs		