

CAA Consultation Assessment

Title of airspace change proposal	BHL UK SAR UAS Trial	
Change Sponsor	Bristow Helicopters Ltd (BHL)	
Project Reference	ACP-2020-001	
Case Officer	[REDACTED]	
Case study commencement date	20/02/2021	
Case study report as at	22/02/2021	
<p><i>Instructions</i></p> <p>In providing a response for each question, please ensure that the 'status' column is completed using the following options:</p> <ul style="list-style-type: none"> • YES • NO • PARTIALLY • N/A <p>To aid the SARG Lead it may be useful that each question is also highlighted accordingly to illustrate what is:</p> <p>resolved YES not resolved PARTIALLY not compliant NO</p>		
Executive Summary		
<p>BHL is the change sponsor of a proposed airspace trial designed to facilitate the test and evaluation of UAS in the search and rescue (SAR) role. Based from Caernarfon Airport the complex will also support activity designed to evaluate emerging conspicuity and collision avoidance technology aimed at providing potential options for wider UAS integration in non-segregated airspace.</p> <p>The consultation on this airspace change proposal (ACP) invited aviation stakeholders in the vicinity of Caernarfon Airport, the Llyn peninsula and Snowdonia National Park to participate to influence the design and the operating procedures of the developing proposal.</p>		
PART A – Summary of Airspace Change Process to date		
A.1		
A.2	Stage 1 DEFINE Gateway	
A.2.1	N/A	

A.3	Stage 2 DEVELOP & ASSESS Gateway	
A.2.1	N/A	
A.3	Stage 3 CONSULT Gateway	
A.3.2	N/A	
A.4	Stage 4 UPDATE & SUBMIT	
A.4.1	The change sponsor formally submitted their trial proposal on 14 December 2020.	
PART B – Consultation Assessment		
B.1	AUDIENCE	
B.1.1	Did the consultation target the right audience?	YES
	<p>CAP 1616, paragraph 316 requires a change sponsor proposing a trial to consult with aviation stakeholders (defined as airspace users, air navigation service providers and airports only).</p> <p>The consultation material was circulated to a total of 38 organisations and individuals via email. The aviation consultees included NATMAC, the MoD via DAATM, NATS, local military and civilian aerodromes (and their users), local airspace users and the national bodies representing UK GA interests who may be affected by the proposed changes - General Aviation Alliance (GAA), the British Gliding Association (BGA), and the British Hang Gliding and Paragliding Association. The emergency services were also consulted (NPAS and West Wales Air ambulance).</p> <p>A full list of stakeholders within these outlined categories can be found in Annex 1 of the consultation feedback report.</p> <p>Based on the stakeholders listed in Annex 1 and the submitted stakeholder correspondence evidence it is concluded that the sponsor targeted the appropriate audience for this type of airspace change.</p>	
B.1.2	Please provide a summary of responses below	

Of the 38 organisations consulted, 28 provided responses and 10 did not respond.

Of the 28 responses, a total of 10 initial objections were received. When categorised four objections were submitted in total – these objections have now been satisfied through engagement with the stakeholders, modifications to the proposal and signed letters of agreement (LoAs).

Categorisation of objections

Several of the objections were made up of individual responses that duplicated those submitted by their representative national associations, specifically the BGA, the BHPA and the GAA. Once categorised by association three main objections remained from the GA community. Following consultation meetings with representatives from the BGA, the BHPA and the GAA, including some of the local stakeholders, BHL reached agreement with all through LoAs.

The MoD via DAATM also registered an objection, however it was caveated agreement would be reached via LoA.

The table below provides further clarity on the way in which objections were categorised.

Objector	Nature of objection	Representing Authority
Snowdon Glider V12 Outdoors BHPA	Freedom of Access to Airspace (OA3) Commercial Impact	BHPA
BGA Cotswold Gliding Club Nympsfield (Bristol and Gloucestershire GC)	Freedom of Access to Airspace (OA3)	BGA
RAF Valley DAATM	Airspace Management, deconfliction with regional military flight operations	DAATM/MoD

	Individual GA Pilot	Freedom of Access to Airspace/ future concepts of operation.	GAA	
	<p>All other consultation responses supported the BHL proposal.</p> <p>Summary</p> <p>Most of the responses from the targeted aviation stakeholders were positive and supported the trial. Many of the initial concerns came from the hang gliding, gliding and para gliding community based in the region of OA3 (these concerns were categorised as freedom of access to airspace OA3). RAF Valley via DAATM also raised concerns around airspace management/deconfliction with military flight operations - however it is agreed these can be mitigated through LoA.</p> <p>At the time of submission all stakeholders who participated in the engagement associated with the proposal were supportive of the trial progressing, having been satisfied with modifications to the design and that appropriate mitigations were in place (outlined in signed letters of agreement).</p>			
B.2	APPROACH			
B.2.1	Did the change sponsor consult stakeholders in a suitable way?			YES
	<p>Taking into consideration COVID-19 circumstances it was appropriate and reasonable for the change sponsor to conduct their consultation focussing on the use of online methods. The consultation was launched and conducted by email; a postal address was also provided as an option for response.</p> <p>In response to stakeholder objections, BHL held online meetings with various GA stakeholders and RAF Valley to discuss concerns and offer the opportunity to reach a compromise and agreement.</p> <p>Through this additional engagement during the consultation period, it was agreed that revisions would be made to the proposed airspace – these are detailed within the final airspace design submission along with agreed LoAs. Evidence of the discussion at these meetings has been provided and all parties are satisfied at time of submission.</p>			

For reference, the change sponsor has outlined the agreed changes to the proposal (following engagement) in the below table which is contained within their submission:

Representing Authority	Nature of concerns	Agreed Solution
BHPA	Freedom of Access to Airspace Commercial Impact	Reduction of OA3 from 4nm to 3nm LoA
BGA	Freedom of Access to Airspace	Reduction of OA3 from 4nm to 3nm LoA
DAATM	Airspace Management, Deconfliction with Regional Military Flight Operations	LoA
GAA	Freedom of Access to Airspace/ future concepts of operation.	Reduction of OA3 from 4nm to 3nm LoA

B.2.2

What steps did the change sponsor take to encourage stakeholders to engage in the consultation?

The emails launching the consultation were sent on 19 October 2020 and the consultation closed on 16 November 2020.

Over the four-week consultation period the sponsor proactively contacted key stakeholders to hold additional meetings during the consultation period to provide clarity on the proposal, gave the opportunity to address any concerns and offered a forum for solutions and compromise to be reached.

The change sponsor has provided evidence of these meetings within their submission, and has summarised these additional steps in the table below:

Stakeholder	Meeting Date	Notes
Caernarfon Airport (DAAIS)	23/09/2020	Pre-submission discussion
	21/10/2020	Airport Management Meeting
Snowdon Gliders	29/10/2020	Team meetings (recorded)
BHPA	06/11/2020	LoA content agreement
	23/11/2020	
V12 Outdoors	29/10/2020	Teams meetings (recorded)
	06/11/2020	
Mona Flying Club	13/11/2020	Tele conference
GAA	13/11/2020	Teams meetings (recorded)
	23/11/2020	LoA content agreement
BGA	13/11/2020	Teams meetings (recorded)
	23/11/2020	LoA content agreement
RAF Valley (DAAIS/DACS)	23/09/2020	Pre-submission notification
	25/09/2020	RAF Valley response
	06/10/2020	Pre-submission discussion
	04/11/2020	LoA content meeting (booked)




B.2.3	Was the change sponsor required to respond to any unexpected events and/or challenges?	YES
	The change sponsor responded to challenges raised from several key stakeholders. Additional meetings were held with these stakeholders during the consultation period as outlined in section B.2.2 above.	
B.3	MATERIALS	
B.3.1	What materials were used by the change sponsor during the consultation?	
	<p>The change sponsor produced a consultation document which was clear, well-structured and of appropriate length (30 pages). Abbreviations were clearly explained, images and charts were of good quality/size and there was also a useful section on the UAS to be operated (Schiebel S-100). The objectives of the trial were clearly outlined, and the proposed design and operations were clearly explained. The change sponsor provided a feedback questionnaire that could either be returned by email or via a postal address.</p> <p>The consultation document was also supported by a presentation. All materials were uploaded to the portal for reference during the consultation period under Step 1.</p> <p>In addition to this the change sponsor held supporting meetings with key stakeholders during the consultation period detailed in B.2.2.</p>	
B.3.2	Did the materials provide stakeholders with enough information to ensure that they understood the issue(s) and potential impact(s) on them?	YES
	<p>Yes – and this was evident through the initial objections to the proposal.</p> <p>The change sponsor specifically asked the following question in their feedback questionnaire on impacts to ensure that stakeholders understood and could articulate the impacts of the proposal on them:</p> <p><i>‘What if any impact will this airspace proposal have on your activities?’</i></p> <p>This question was used by GA and RAF Valley to outline and explain their initial concerns with the proposal and the feedback was used by the change sponsor as the basis to inform further planned engagement with relevant parties. Further clarity was provided to stakeholders through supplementary meetings, the agreed LoAs show that stakeholders understand the impact this proposal has on them and are content with the mitigations put in place by</p>	

	the revisions and adaptations to the final submission.	
B.4	LENGTH	
B.4.1	Please confirm the start/end dates and the duration of the consultation below	
	The emails launching the consultation were sent on 19 October 2020 and the consultation closed on 16 November 2020 (four weeks in total).	
B.4.2	If duration was less than 12 weeks, what was the justification?	YES
	BHL has engaged extensively in the past with impacted aviation stakeholders under the legacy CAP722/1616 which was used to inform their engagement approach on this ACP. The one-month consultation period was proportionate to the impact of this proposal and no concerns were raised by stakeholders about the length of time to provide meaningful responses to the consultation.	
B.4.3	Was the period of consultation proportionate?	YES
B.5	GENERAL	
B.5.1	Was the conduct of the consultation aligned with the consultation strategy?	N/A
	N/A – there is no specific requirement to produce a consultation strategy for a trial.	
B.5.2	Has the change sponsor categorised the responses in accordance with CAP 1616?	N/A
	N/A – there is no specific requirement to produce a categorisation report for a trial.	
B.5.3	Has the change sponsor correctly identified all the issues raised during the consultation and accurately captured them in the consultation response document?	YES
	The change sponsor has correctly identified and captured the issues raised from the feedback they have included within their submission.	
B.5.4	Does the consultation response document detail the change sponsor's response to the identified issues?	YES
	The change sponsor has outlined within their consultation feedback report, their responses to the initial objections outlined in	

	section B.1.2. The change sponsor has made adaptations and changes to their proposal in response primarily to the issues and concerns raised by the GA community and RAF Valley. Letters of Agreement reached <ul style="list-style-type: none">Between BHL and the BGA, the GAA and the BHPA – outlining the terms of an agreement to be entered into the respect of agreed standard operation procedures for OA3Between BHL and RAF Valley	
B.5.5	Is the change sponsor's response to the issues raised appropriate/adequate?	YES
	Please see operational assessment where this question is addressed in full.	
B.5.6	Is the formal airspace change proposal aligned with the conclusions of the consultation response document?	YES
B.6	RECOMMENDATIONS/CONDITIONS/PIR DATA REQUIREMENTS	
B.6.1	Are there any Recommendations which the change sponsor <u>should try</u> to address either before or after implementation (if approved)? If yes, please list them below.	N/A
B.6.2	Are there any Condition(s) which the change sponsor <u>must fulfil</u> either before or after implementation (if approved)? If yes, please list them below.	YES
	Yes, all Letters of Agreement have been drawn up and signed.	
B.6.3	Are there any specific requirements in terms of the data to be collected by the change sponsor for the Post Implementation Review (if approved)? If yes, please list them below.	N/A
PART C – Consultation Assessment Conclusion(s)		
C.1	Does the consultation meet the CAA's regulatory requirements, the Government's guidance principles for consultation and the Secretary of State's Air Navigation Guidance?	YES

	<p>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. I am satisfied that these principles have been applied by the change sponsor during the consultation. I am satisfied that the change sponsor has conducted this consultation in accordance with the requirements of CAP 1616 and they have demonstrated that the Gunning Principles have been considered throughout this consultation exercise.</p>
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PART D – Consultation Assessment Sign-off

	Name	Signature	Date
Consultation assessment completed by Principal Airspace Regulator – Engagement and Consultation			

PART E – Manager Airspace Regulation – Comment/Decision

Comment/Decision:

Name	Signature	Date
