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ACP-2020-024

E-7 Wedgetail Operating Areas

STAGE 3A

CONSULTATION STRATEGY

V1.0



Ministry
of Defence

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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 ISTAR FHQ.

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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.

Revision Number	Affected part	Revised By	Notes
Initial Issue V1.0		Project Lead	

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Introduction

This document forms part of Stage 3 of the Airspace Change Proposal ACP-2020-024, which seeks to secure suitable non-segregated airspace to operate the E-7 Wedgetail aircraft.

In order to meet the operational and training requirements for the E-7 the following assumptions were agreed at Stage 1:

- The areas will be non-segregated.
- The defined areas will allow interaction on the NATS equipment to ensure controllers are alerted to potential confliction.
- Confliction resolution will be tactically managed against the specific aircraft, not the airspace.
- The airspace will define the scope of the area where the E-7 has non-deviating status, which is similar to how the E-3D operated.
- The levels required for the areas will be fully contained in Class C airspace.

The CAA accepted the Sponsor's submission at the Stage 2 'DEVELOP AND ASSESS' Gateway on 17 April 2023 and redacted versions of all submission documentation can be found on the portal¹.

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 26 May 23.

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.

¹ [Airspace change proposal public view \(caa.co.uk\)](https://www.caa.co.uk/air-traffic/air-traffic-management/air-traffic-management-proposals/air-traffic-management-proposals-public-view)

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- **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). The main virtual portal will be Citizen Space. The Sponsor will deal directly via MS Teams/Email with NATS and Eurocontrol who are the main Stakeholders. All records/issues raised with these organisations during the CONSULT phase will be published on Citizen Space for transparency and openness.
- Information is presented in a jargon-free way and is accessible to both aviation professionals and the general public alike. The main Stakeholders from Stage 1 and 2 were identified as NATS and Eurocontrol. They should be conversant with the vast majority of aviation terminology. A comprehensive Glossary should cover all other eventualities.
- 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.

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Additionally, the Sponsor has used the most up-to-date and credible data available within the consultation documentation. This includes open-source 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 was submitted to the CAA and uploaded to the Portal. The SoN articulates the requirement to facilitate E-7 Wedgetail operating areas.
1B	Stage 1B saw the Sponsor propose and then engage on a set of DESIGN PRINCIPLES (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.
2A	Stage 2A saw the development and assessment of several airspace change options. Engagement was sought on the initial options in the OPTIONS DEVELOPMENT documentation which was sent to stakeholders for comment.
2B	As part of Stage 2B the Sponsor compiled a document set that formed part of the OPTIONS APPRAISAL . 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).

Section 1 – Audience

1.1 The sponsor believed that there was a case for limited stakeholder involvement at Stages 1 and 2 of the ACP. The only external stakeholder was identified as NATS with the MOD being informed and consulted via the Defence Airspace and Air Traffic Management (DAATM) organization. The Sponsor intends to continue consultation with NATS throughout the Stage 3 CONSULT process but will also consult with other interested parties on specific issues.

1.2 During the Stage 2 process it became apparent that engagement was required with Eurocontrol as several of the proposed E-7 operating areas, primarily in the North Sea and on the East Coast of the UK, could affect flow control between the UK UIR and adjoining overseas FIRs/UIRs. An inaugural meeting was conducted with Eurocontrol and NATS in Sep 22. Further consultation will be conducted with Eurocontrol throughout the Stage 3 CONSULT process to determine what, if any impact, this ACP will have on adjoining FIRs/UIRs.

1.3 The Sponsor had not considered the BGA to be an interested party in this ACP as the base height of all the proposed E-7 operating areas was FL270. However, there is a Gliding Site just south of RAF Lossiemouth in the vicinity of one of the operating areas that has vertical limits of Surface to Unlimited. Whilst operations above FL270 will be infrequent the BGA will be consulted about this site and any others that may be of relevance. Email correspondence with the BGA was initiated in February 2023.

1.4 The Sponsor has reviewed the full list of NATMAC members and assessed that, with the exception of NATS, the MOD and the British Gliding Association (BGA), this ACP would have no impact on the wider membership.

1.5 Any other interested parties will be actively consulted with during the Stage 3 CONSULT process as and when their interest becomes apparent via Citizen Space or direct contact with the Sponsor via email or letter.

1.6 The MOD deemed at Stage 1 that the following parties would have no interest in this ACP

- GA community – Operating levels (FL270 – FL350) and controlled airspace.
- The Airlines – Not Segregated airspace.
- Aerodromes – Operating levels (FL270 – FL350).
- Local communities – Expect to see no change to noise or air pollution (FL270 – FL350).

1.7 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*
Military Aviation Authority (MAA)	Defence Airspace and Air Traffic Management (DAATM)	Swanwick Mil

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 via [Citizen Space](#) (primary method) , MS Teams and email.

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 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 and Consultation Full Options Appraisal (Phase II) and sent a reminder 2 weeks prior to the consultation end date. As a result of the limited Stakeholder Engagement agreed at Stages 1 and 2 the Sponsor envisages all consultation will be electronic.

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 these communities. The consultation strategy will therefore employ a variety of consultation methods with stakeholders. This will include:

2.3.1 Online consultation. Targeted emails will direct stakeholders to the Citizen Space portal in order to read/distribute the consultation material and respond. The use of Citizen Space ensures openness and transparency.

2.3.2 Virtual consultation. The Sponsor will arrange for a number of virtual meetings with Eurocontrol and NATS, commencing mid-June 2023. This will cater for dispersed geographic locations and/or potential group discussion.

2.4 Consultation responses will be encouraged via Citizen Space however email or a written method of submitting responses will also be offered:

- Email: [REDACTED]
- Letter: FAO: [REDACTED]
ISTAR FHQ
RAF Waddington
Lincoln
LN5 9NB

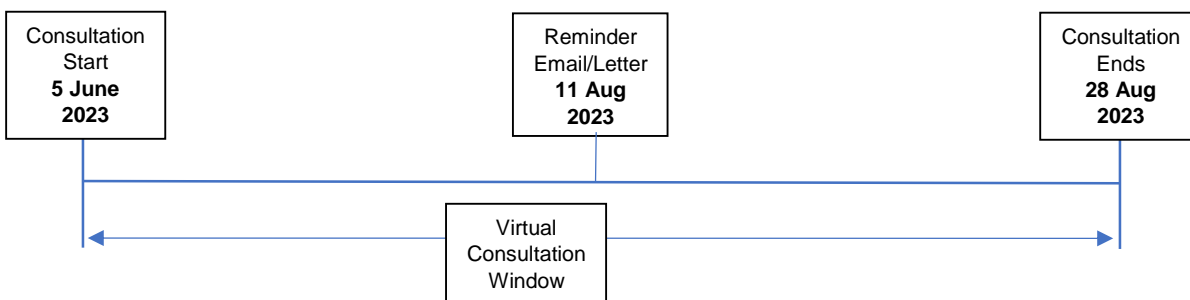
Contingency Planning

2.5 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 may 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.

2.6 Any unexpected events or challenges throughout the consultation period may also lead to a request to extend the consultation period to facilitate additional virtual events. Should this be the case details will be published on Citizen Space and targeted emails sent to Stakeholders.

Consultation Timeline

2.7 The consultation timeline can be found below. Dates are based on the proposed start-date of 5 June 2023, 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.



Section 3 – Material

Consultation Documentation

- 3.1 The following documentation will be presented for stakeholders to read:
- Frequently Asked Questions. 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. This will be updated via Citizen Space.
 - Consultation Document. The main document will provide a more comprehensive breakdown of the single airspace option (Option 1) 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 digest more technical detail.

Online Portal

3.2 Citizen Space will be the primary method of providing online 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

3.3 Hard copies of all consultation documentation will be available by request for stakeholders unable to access the online material. 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.

3.4 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 be outlined in the launch email.

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:

- 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.
- E-7 Wedgetail In Service Date (ISD) is Q4 2024 therefore there is no requirement to compress the consultation period.

4.2 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 5 June 2023 to 28 Aug 2023**.

Section 5 – Post-Consultation

Collate and review responses

5.1 On completion of consultation the Sponsor will review all responses and categorise them into those that may impact the ACP and those that do not. Analysis, categorisation and the production of the Sponsor’s Stage 3D submission will then be sent to the CAA for review.

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 27 October 2023 as part of Stage 4. This is in order to comply with the timeline agreed with the DECIDE gateway planned for 12 January 2024.

Stage/Step	Description	Gateway Date
3C	Consultation Launch	5 June 2023
	Reminder to Stakeholders	11 August 2023
3D	Collate and review responses from consultation.	28 August 2023
4A	Update design	11 September 2023
4B	Submit Airspace Proposal to the CAA	27 October 2023
5	DECIDE Gateway	12 January 2024
6	IMPLEMENT into AIRAC 04/2024	April 2024