



Ministry
of Defence

ACP-2021-078

**ENABLING REMOTELY PILOTED AIRCRAFT SYSTEM
OPERATIONS FROM RAF FAIRFORD - HALE**

STEP 3A CONSULTATION STRATEGY

Version 2

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ACP-2021-078 Revision History-Consultation Strategy	
Page/Paragraph	Change
Pg. 8 NATMAC Table edited	Added: New NATMAC list indicates DAATM. Other MoD entities are included by name
Pg 8. para. 2 (added)	The Sponsor has determined that contacting individual properties will not be needed as the ACP is assessed to have no impacts below 7,000 feet and thus is expected to have no impacts on individual properties
Pg. 9 New Table	Added: Airline Stakeholder Table
Pg. 10 Individual Table	Added: Johnny Salmon
Pg. 11 Added under: Methods of Consultation	Added: The Sponsor has determined that, through engagement in previous Stages, it understands the potentially impacted and interested stakeholders of this ACP and has the resources required to conduct consultation without the need of a third-party intermediary.
Pg. 11 Added under: Notification of Consultation	Added: The consultation materials and information about this ACP will also be included in Citizen Space and on the ACP Portal. The Sponsor is confident that these are sufficient methods of publicising this ACP. As a Level M2 change, this ACP is expected to primarily impact aviation stakeholders. As such, other methods were not deemed necessary to reach potentially impacted stakeholders or other potentially interested parties
Pg. 11 Added under: Methods of Consultation	Added: The Sponsor is confident that advertising these events via email and via Citizen Space are sufficient methods of publicising them. As a Level M2 change, with impacts expected primarily to aviation stakeholders, other methods were not deemed necessary to reach potentially interested parties
Pg. 12 Added under: Methods of Consultation	Added: The Sponsor understands that stakeholders may request to provide feedback in other formats. In these cases, the Sponsor will consider these requests and strive to comply with them to the maximum extent practicable. These requests can be made via the email address or mailing address above.
Pg. 12 Added under: Methods of Publicising Events	Added: The Sponsor is confident that advertising these events via email and via Citizen Space are sufficient methods of publicising them. As a Level M2 change, with impacts expected primarily to aviation stakeholders, other methods were not deemed necessary to reach potentially interested parties
Pg. 12 Added under: Virtual Consultation	Added: Full web address added for Citizen Space.
Pg. 12 Added under: Virtual Consultation	Added: The Sponsor understands that stakeholders may request consultation materials in other formats and will consider these requests and strive to comply with them to the maximum extent practicable.

Pg. 12 para (added)	Added: The Sponsor understands that stakeholders may request to provide feedback in other formats. In these cases, the Sponsor will consider these requests and strive to comply with them to the maximum extent practicable.
Pg 13 para. Consultation Timeline and Timeline Table	Changed: Consultation window to 11 Oct 2023-21 Nov 2023
Pg. 13 para. 2 (added)	Added: If consultation is extended, stakeholders will be notified via email and the notice of extension will be posted on Citizen Space and the ACP Portal.
Pg. 14 Added Alternative Formats para.1	Added: The Sponsor understands that stakeholders may request consultation materials in other formats and will consider these requests and strive to comply with them to the maximum extent practicable
Pg. 14 Added Alternative Formats para.2	This request can be made via email (USAFE3.A3AA.USAFE_AIRSPACE@us.af.mil) or by mail at the address in Section 3.

Introduction

This document forms part of Stage 3 of the Airspace Change Proposal ACP-2021-078, which seeks to enable regular Beyond Visual Line of Sight (BVLOS) operation of High Altitude Long Endurance (HALE) Remotely Piloted Air Systems (RPAS) from RAF Fairford.

The CAA accepted the Sponsors' submission at the Stage 2 "DEVELOP AND ASSESS" Gateway on 29 July 2022, and redacted versions of all submission documentation can be found on the Portal.

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 CAP 1616 airspace change process. This consultation strategy forms part of a wider submission that will be sent to the CAA in time for the Stage 3 "CONSULT" Gateway that is planned for 29 September 2023.

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 who may be impacted or may have interest in the proposal.

Approach

This will detail the methods the Sponsor will use to inform stakeholders and provide a length and 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 accessible as possible to a range of audiences.

Post-Consultation

This section will outline the actions to be taken after the end of the consultation period.

Objectives

The objectives of this consultation strategy will be guided by the Gunning Principles. The Gunning Principles are principles that set out the legal expectations surrounding formal consultation. They consist of four principles, which if followed, are designed to make consultation fair and lawful:

- **Gunning 1** – Consultation must be at a time when proposals are still at a formative stage.
- **Gunning 2** – Sufficient reasons must be put forward for any proposal to permit “intelligent consideration” and response.
- **Gunning 3** – Adequate time is given for consideration and response.
- **Gunning 4** – The product of consultation is conscientiously taken into account by the decision maker(s).

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

- Seek the highest level of participation from the stakeholder audience. This will include direct engagement in both physical and virtual methods and may involve the use of intermediaries to reach seldom-heard groups.
- Develop materials that will allow both aviation professionals and the general public to understand the proposal and the impacts.
- Ensure adequate time is allowed for consultation so that the proposal can be considered and responded to in a comprehensive manner.

Section 1 – Summary of Engagement Activity Undertaken to Date

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

Engagement Timeline Overview

Date	Action	Remarks
12 Nov 21	Sponsor email address and Stage 1A documentation (SoN) published on CAA ACP portal.	
9 Dec 21	Engagement letter emailed to stakeholders	Feedback requested by 10 Jan 22
20 Jan 22	Email to all stakeholders extending the engagement period	Feedback requested by 10 Feb 22.
10 Feb 22	Engagement period finished	18 responses received
9 Mar 22	Oxfordshire RAUWG Presentation	51 Attendees
26 Apr 22	Formal engagement with Brize Norton ATC	F2F at RAF Brize Norton
27 Apr 22	Formal engagement with 78 Sqn	F2F at NATS Swanwick
5 May 22	Engagement letter and feedback form emailed to stakeholders.	Feedback requested by 1 Jun 22
24 May 22	Formal engagement with NATS	F2F at NATS Swanwick
1 Jun 22	Feedback deadline	16 responses
7 Jun 22	Follow up engagement with London Oxford Airport	Via Microsoft Teams
7 Jun 22	Follow up engagement with VOWH Flight Centre	Via Microsoft Teams
8 Jun 22	Follow up engagement with BGA	Via Microsoft Teams
9 Nov 22	Engagement with NATS on airspace design	Via Microsoft Teams
29 Nov 22	Engagement with NATS on airspace design	F2F at NATS Swanwick
24 Jan 23	Engagement with NATS on airspace design	Via Microsoft Teams
9 May 23	Engagement with NATS on airspace design	Via Microsoft Teams
6 Jun 23	Engagement with NATS on airspace design	Via Microsoft Teams
27 Jun 23	Engagement with NATS on airspace design	Via Microsoft Teams
1 Aug 23	Engagement with NATS on airspace design	Via Microsoft Teams
5 Sep 23	Engagement with NATS on airspace design	Via Microsoft Teams

Section 2 – Audience

The Sponsor has selected aviation stakeholders from an area within a radius of approximately 30 miles from RAF Fairford and has used the National Air Traffic Management Advisory Committee (NATMAC) as a means of broader engagement. The Sponsor has verified that the NATMAC list below is the most up-to-date version. This list will be used as the basis for consultation along with the stakeholders listed in the following tables.

The Sponsor has determined that contacting individual properties will not be needed as the ACP is assessed to have no impacts below 7,000 feet and is thus expected to have no impacts on individual properties.

NATMAC Stakeholders		
Airlines UK	Airport Operators' Association (AOA)	Airfield Operators' Group (AOG)
Aircraft Owners and Pilots Association (AOPA)	Airspace Change Organising Group (ACOG)	Association of Remotely Piloted Aircraft Systems UK (ARPAS UK)
Aviation Environment Federation (AEF)	British Airways (BA)	BAe Systems
British Airline Pilots' Association (BALPA)	British Balloon and Airship Club	British Business and General Aviation Association (BBGA)
British Gliding Association (BGA)	British Helicopter Association (BHA)	British Microlight Aircraft Association (BMAA)
British Skydiving	Drone Major	General Aviation Alliance (GAA)
Guild of Air Traffic Controllers (GATCO)	Honourable Company of Air Pilots (HCAP)	Helicopter Club of Great Britain (HCGB)
Heavy Airlines	Isle of Man CAA	Light Aircraft Association (LAA)
Low Fare Airlines	Military Aviation Authority (MAA)	Ministry of Defence - Defence Airspace and Air Traffic Management (MoD DAATM)
National Air Traffic Services (NATS)	Navy Command HQ	PPL/IR Europe
UK Airprox Board (UKAB)	UK Flight Safety Committee (UKFSC)	United States Visiting Forces (USVF), HQ United States Country Rep-UK (HQ USCR-UK).

Local Aviation Stakeholders		
Bath, Wilts and North Dorset Gliding Club	Bristol & Gloucestershire Gliding Club / Nympsfield Airfield	Bristol Airport
Charlton Park Airfield	Clench Common Microlight Site, Marlborough	Cotswold Airport (Kemble)
Cotswold Gliding Club / Aston Down Airfield	Dalton Barracks, Abingdon	Draycott Aerodrome, Swindon
Enstone Airfield	Gloucestershire Airport	London Oxford Airport
Membury Airfield	Oaksey Park Airfield, Malmesbury	RAF Benson
RAF Brize Norton	RAF Little Rissington	RAF Weston-on-the-Green
Rendcomb Airfield	RLC Silver Stars, South Cerney	South Cerney, Cloudbase Paragliding
Vale of the White Horse Gliding, Sandhill Farm	West Wales Airport	Wiltshire Microlight Centre, Calne
Bidford Gliding & Flying Club	Ledbury Airfield	Shobdon Airfield
FLYER		

Airline Stakeholders		
Air Canada	Air France	Ethiopian Airlines
European Air Transport	FedEx	Jet2
Lufthansa	Ryanair	TUI Airlines
United Airlines	UPS	West Atlantic Cargo Airlines

Local Authority Stakeholders		
Fairford Town Council	Cotswold District Council	Swindon Borough Council
Vale of White Horse District Council	West Oxfordshire District Council	Gloucester City Council
Gloucestershire County Council	Oxfordshire County Council	Warwickshire County Council
Wiltshire County Council	Worcestershire County Council	

Other Local and National Organisations		
Campaign to Protect Rural England	Cotswold AONB	County Land and Business Association
Environment Agency	Local Resilience Forum	Natural England

Individuals		
Ben Fawkes	Rob Wendes	Adrian Whitmarsh
Jonny Salmon		

Section 3 – Approach

Notification of Consultation

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 when requested, in order to reach a maximum number of potentially interested parties. This broad approach to notification aims to meet the intent of CAP 1616 and the requirement to include seldom-heard groups in consultation.

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, reminder emails will be sent to existing stakeholders two weeks prior to the consultation end date.

The consultation materials and information about this ACP will also be included in Citizen Space and on the ACP Portal. The Sponsor is confident that these are sufficient methods of publicising this ACP. As a Level M2 change, this ACP is expected to primarily impact aviation stakeholders. As such, other methods were not deemed necessary to reach potentially impacted stakeholders or other potentially interested parties.

Methods of Consultation

The Sponsor has determined that, through engagement in previous Stages, it understands the potentially impacted and interested stakeholders of this ACP and has the resources required to conduct consultation without the need of a third-party intermediary.

As a Level M2 change the Sponsor will primarily consult with other users of the airspace as well as ATS providers. This will include:

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

Physical Consultation- Physical meetings will be held to enable consultation with ATS providers. Additional physical meetings may be scheduled as required. The following physical events are planned:

- 1x Meeting with RAF Brize Norton
- 1x Meeting with NATS
- 1x Meeting with 78 Squadron (Swanwick Military)

Virtual Consultation- Two virtual meetings will be held to allow stakeholders to provide feedback. These meetings will primarily be aimed at aviation stakeholders and NATMAC organisations not geographically close to the RAF Fairford or otherwise unable to make any physical events. Additional virtual meetings may be scheduled, as required. The following virtual events are planned:

- 24 October 2023 at 1300 via Microsoft Teams Meeting with a dial-in option
- 2 November 2023 at 1800 via Microsoft Teams Meeting with a dial-in option

For both physical and virtual meetings, stakeholder feedback will be recorded via detailed meeting minutes that describe what was discussed and the feedback provided.

The Sponsor understands that stakeholders may request online and/or physical meetings in other formats and will consider these requests and strive to comply with them to the maximum extent practicable.

Consultation responses will be encouraged through the Citizen Space portal that can be reached at the address below.

<https://consultations.airspacechange.co.uk/mod-daاتم/enabling-rpas-operations-from-raf-fairford>

The following methods of submitting responses will also be offered.

- Email (having completed the response form attached to the consultation document):
USAFE3.A3AA.USAFE_AIRSPACE@us.af.mil
- By Mail (hard copy feedback forms available upon request)

USAFE-UK
Unit 4840
RAF Mildenhall Bury St Edmunds
Suffolk IP28 8NF
OFFICIAL BUSINESS

The Sponsor understands that stakeholders may request to provide feedback in other formats. In these cases, the Sponsor will consider these requests and strive to comply with them to the maximum extent practicable. This request can be made via the email address or by mail at the address above.

Method of Publicising Events

Details for all events will be found on Citizen Space. All event details will also be outlined in the launch email, which will allow national bodies and local authorities to disseminate details as necessary.

The Sponsor is confident that advertising these events via email and via Citizen Space are sufficient methods of publicising them. As a Level M2 change, with impacts expected primarily to aviation stakeholders, other methods were not deemed necessary to reach potentially interested parties.

Contingency Planning

Should COVID-19 or some other disruption limit the planned physical events, the Sponsor will replace any planned physical events with a virtual one.

Should it be deemed that the consultation has either not provided the Sponsor with appropriate material or stakeholders sufficient opportunity to respond, the consultation period will be extended in order to generate the required feedback. This plan will be enacted in consultation with the CAA.

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

If consultation is extended, stakeholders will be notified via email and the notice of extension will be posted on Citizen Space and the ACP Portal.

Consultation Timeline

The Sponsor intends to conduct a 6-week consultation instead of the standard 12-week consultation period. This decision was made due to the determination of no impacts to civil traffic below 7,000 feet and the extensive engagement already undertaken with other users of the airspace as well as ATS providers.

The Sponsor intends to start consultation as soon as practicable from the CONSULT gateway. In order to provide a short period of time post-Gateway for any minor rectification, the Sponsor would like to propose a consultation period from **11 October 2023 - 21 November 2023**.

The consultation timeline can be found below. Events have been planned to ensure stakeholders have sufficient time to receive and, if necessary, promulgate material to others before commencing direct consultation.

Consultation Timeline

Date	Activity	Location
29 Sep 2023	Stage 3B Consult Gateway	
11 Oct 2023	Stage 3C Consultation Launch	CAA ACP Portal
11 Oct – 21 Nov 2023	Public promotion	Citizen Space and email
24 Oct 2023	Virtual Consultation	Microsoft Teams with a dial-in option
2 Nov 2023	Virtual Consultation	Microsoft Teams with a dial-in option
7 Nov 2023	Reminder to Stakeholders	Email
21 Nov 2023	Consultation closes	

Section 4 – Materials

Consultation Documentation

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 Consultation Document will provide the overall view of the options presented, along with information required for stakeholders to understand how it might impact their activities.
- **Full Options Appraisal (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 details.

Online Portal

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

Virtual briefings will be conducted with a PowerPoint presentation. This will be made available on the Citizen Space portal and can also be requested by email or mail at the addresses in **Section 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 in **Section 3** above.

Requests for hard copies are to be made via the email address in **Section 3** of this document or by post. Hard copies will then be sent by post. The process for requesting hard copies will be outlined in the launch email.

Alternative Formats

The Sponsor understands that stakeholders may request consultation materials in other formats and will consider these requests and strive to comply with them to the maximum extent practicable.

These requests can be made via email (USAFE3.A3AA.USAFE_AIRSPACE@us.af.mil) or by mail at the address in **Section 3**.

Section 5 - Post- Consultation

Collate and Review Responses

On completion of consultation, the Sponsor will review all responses and categorise them 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.

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

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.

Provided additional consultation is not required, the Sponsor will begin to draft the final submission to the CAA as part of Stage 4 DECIDE Gateway planned for **8 December 2023**.