



East Anglia Hub Wind Farms

ACP 2023 079

Engagement Strategy

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1 Engagement Strategy Overview

1.1 Introduction

This strategy forms part of the document set required to meet the requirements of the Civil Aviation Authority (CAA) Civil Aviation Publication (CAP) 1616h – Guidance on Airspace Change Process for Level 3 and Pre-Scaled Airspace Change Proposals and satisfies the Stage 3 Consult/Engage requirement in terms of the development of an engagement strategy. The CAA has confirmed the level for this airspace change would be Level 3 under the updated guidance provided in version 5 of CAP 1616.

The Change Sponsor (CS) has completed all the documents that are required up to Stage 2 of the CAP 1616h process. The CS will also submit this document to the CAA for review to satisfy the agreed Airspace Change Proposal (ACP) timeline. CAP 1616h has no Stage 3 gateway submission for this pre-scaled process. However, for the CS to execute their engagement strategy, it must first be approved by the CAA.

Redacted versions of all submission documentation can be found on the CAA Airspace Change Portal:

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

1.2 Document Structure

The aim of this document is to demonstrate that a comprehensive engagement strategy has been developed. This strategy must satisfy the requirement for engagement at Stage 3 of the CAP 1616h airspace change process. This engagement strategy also forms part of a wider submission that will be presented to the CAA in time for the Stage 4 'Update and Submit' Gateway. A date for this will be agreed between the CS and the CAA after this document is approved.

This engagement strategy will include sections that detail:

- Activity Undertaken – a summary of engagement activity undertaken to date during Stages 1 and 2.
- Stakeholder Audience – this will highlight the stakeholders already identified based on their input (either positive or negative) or perceived interest in the proposal.
- Engagement Approach – this will outline which methods the CS will use to inform stakeholders and provide a timeline of engagement activities. It will also outline the Sponsor's contingency plans for unexpected events and the products which will be created to enable stakeholders to provide informed responses, including materials that will be developed to ensure maximum accessibility for a range of audiences. This section will also include the start and end dates of the engagement period.

1.3 ACP Aim

The East Anglia Hub (EA Hub) is being developed by Scottish Power Renewables (UK) Ltd (SPR). This ACP is sponsored by SPR, who will be referred to in this document as the Change Sponsor (CS).

The CS has initiated the ACP in order to develop suitable mitigations that ensure aviation operations and air traffic control provision for both the National Air Traffic Services En-Route Ltd (NERL) and the Ministry of Defence (MOD) remain unhindered, despite the presence of the Wind Farms and associated Wind Turbine Generators (WTGs).

1.4 Engagement Strategy Objectives

The Gunning Principles¹ are a set of rules for public consultations and the CS will use these principles to inform the engagement strategy and guide its engagement activity. The CS will aim to ensure:

- 1. Proposals are still at a formative stage.**
 - A final decision has not been made, or predetermined, by the decision makers.
- 2. There is sufficient information to give 'intelligent consideration'.**
 - The information provided must relate to the consultation and must be available, accessible, and easily interpretable for consultees to provide an informed response.
- 3. There is adequate time for consideration and response.**
 - There must be sufficient opportunity for consultees to participate in the consultation. As this ACP has been downgraded to a level 3 ACP, the engagement period is 6 weeks, with an engagement reminder at 3 weeks. This allows an adequate length of time for consultees to respond.
- 4. Conscientious consideration must be given to the consultation responses before a decision is made.**
 - Decision makers should be able to provide evidence that they took consultation responses into account.

Following these principles, will ensure that engagement is thorough, reaches the correct audience and employs the correct methods to generate valuable contributions that will aid the development of the proposal. In order to conduct the necessary engagement activity, the CS had developed a set of strategic objectives that will guide its production of the required documentation in line with the Gunning Principles and the requirements of CAP 1616h. These objectives are to:

- Prepare engagement document(s), suitable for stakeholders to understand, interpret and comment on (Gunning Principle (GP) 2).

¹ <https://www.local.gov.uk/sites/default/files/documents/The%20Gunning%20Principles.pdf>

- Prepare the engagement questionnaire to encourage stakeholders to provide their opinion (GP 2).
- Engage with stakeholders who have been identified as part of and participated in Stage 2 stakeholder engagement (GP 1).
- Accept engagement responses from any individual or organisation (GP 3).
- Complete a 6-week engagement (subject to extensions if appropriate) (GP 3).
- Hasten stakeholders by email if they have not responded after 3 weeks to remind them of the deadline for engagement (GP 3).
- Provide a link to the information on the East Anglia Hub website, the CAA Airspace Change Portal and the Engagement Feedback Document. This will include reminders of the deadline for the engagement GP 3)
- Provide engagement documents on the CAA Airspace Change Portal (GP 2).
- Provide a Frequently Asked Questions (FAQ) document, published on the CAA Airspace Change Portal (GP 4).

2 Engagement Activity Undertaken to Date

2.1 Introduction

As per the guidance in CAP 1616h, a more limited range of targeted engagement activities has already been conducted. Specifically, key stakeholders have been involved in the development of the Design Principles, which, post engagement, remained unchanged.

The engagement undertaken during Stages 1 and 2 was at the stakeholder representative level, in accordance with CAP 1616h, and the documentation developed to date is detailed in Table 1 below:

2.2 Previous Stakeholder Engagement

ACP Stage	Engagement Activity Summary
1	A <u>Statement of Need</u> (SoN) was submitted to the CAA and uploaded to the Airspace Change Portal. The SoN articulates the desire by SPR to engage with relevant aviation stakeholders to ensure suitable mitigation is developed for the WTGs, so they do not impact aviation operations and air traffic control provision in the development area.
	The <u>Assessment Meeting</u> minutes between the CS and the CAA were uploaded to the Airspace Change Portal. The Assessment Meeting is conducted to allow the CS and CAA to discuss the SoN and consider whether the proposal falls within the CAP 1616 formal airspace change process.
2	<p>Stage 2 saw the CS propose and engage on a set of <u>Design Principles</u> (DPs). The purpose of the DPs is to agree on a criterion against which the airspace design options can be assessed. The draft DPs were sent to the stakeholders and feedback was actively sought.</p> <p>During this engagement, six responses were received. None of the responses caused any requirement to amend the proposed DPs which were therefore taken forward unchanged.</p> <p>Feedback from the stakeholders was collated and is contained within the <u>Design Principles: Stakeholder Engagement</u> documentation.</p>
2	Stage 2 saw the development and assessment of 17 options (including a 'Do Nothing' option) that could mitigate the wind farm installation, in line with the SoN and the DPs. In line with a Level 3 ACP, no further stakeholder engagement was carried out at this point.

ACP Stage	Engagement Activity Summary
	<p>As part of the Stage 2 activity, all options developed were qualitatively assessed in the <u>Design Principles Evaluation (DPE)</u> document which was subsequently uploaded to the Airspace Change Portal.</p> <p>A total of two design options were considered viable following the DPE assessment.</p>

Table 1 - Engagement Activity Summary.

3 Engagement Stakeholders - Audience

3.1 CAP 1616h Requirements

As per the requirements in CAP 1616h, the CS must identify relevant stakeholders, share the design options and take feedback into account. This ACP will utilise Appendix B of CAP 1616h as no part of the planned TMZs comes within 3nm of the UK mainland.

A list of stakeholders was identified at Stage 1 of the ACP and the CS intends to conduct further engagement with this set of stakeholders. In addition to the stakeholders previously engaged, the CS will contact minor aerodromes which may be affected by the development area of influence.

3.2 The Area

EA1N is situated 36 kilometres (km) east of the UK's Eastern coastline. EA2 is situated 10 km southwest of EA1N. EA3 is situated 70km east of Great Yarmouth. To ensure a comprehensive list of stakeholders was identified and given the chance to make comment, the CAA has provided the National Air Traffic Management Advisory Committee (NATMAC) list. As the areas out to sea could be used by any airspace user, the CS wishes to elicit comment specifically from those users who may be impacted by this ACP. Publicising this engagement using its various social media platforms, as well as through NATMAC, will ensure the CS can consider comments from as large an audience as possible.

3.3 The Audience – Aviation Stakeholders

For aviation stakeholders, the CS's believes the introduction of two Transponder Mandatory Zones (TMZs) will offer enhanced safety benefits whilst entailing minimal or no impact on aviation stakeholders and operating costs (including fuel burn). Stakeholders will be able to assess the impact on their operations from the images and analysis contained in the Engagement Document.

The aviation stakeholders that are directly contacted during this engagement phase will be those previously contacted during Stage 2 of this ACP. The CS will also engage with local aerodromes to ensure that their members and users have an opportunity to view and comment on this proposal.

All identified aviation stakeholders will be listed in [Appendix A1](#).

3.3.1 Local General Aviation

The CS will engage with airspace users classed as General Aviation (GA) that have been identified as already operating in proximity of the proposed changes. GA operators are likely to be interested in any changes to their access to airspace. Engagement will include the GA clubs and local airfields listed in Table 2 in [Appendix A1](#).

3.3.2 National Organisations

The CS will engage with the NATMAC and request that information is forwarded to members of their respective organisations. Members of the NATMAC have been listed in Table 3 in [Appendix A1](#).

3.3.3 Ministry of Defence (MOD)

As a mandatory stakeholder for all airspace changes, the CS will engage with the MOD through the addresses listed as part of the NATMAC list which include Defence Airspace and Air Traffic Management (DAATM) and the Military Aviation Authority (MAA).

3.3.4 Adjacent Airports/Air Navigation Service Providers

The CS will continue to work closely with the local Air Navigation Service Providers (ANSPs) Defence Airspace and Air Traffic Management (MoD DAATM), London FIS, East Anglia Radar and National Air Traffic Services (NATS). This group is a key stakeholder and have previously been engaged. These contacts have been included in Table 4 in Appendix A1.

3.4 The Audience – The Hard-to-Reach

The CS is seeking to understand and identify any impact that this ACP will have on identified stakeholders. These impacts may include, but may not be limited to, such issues as a financial burden arising from the purchase of transponder equipment, or from possible increased fuel costs associated with additional routing around the proposed TMZs. It is therefore important to ensure that all relevant aviation stakeholders who were identified in Stage 2 of this process, will continue to be engaged in this projects progress during Stage 3.

The CS acknowledges that not all airspace users who may be impacted by the proposed TMZs operate from an aerodrome close to the proposed site. Nor does every airspace user operate in the area frequently. The groups are therefore defined as users who could be a hard-to-reach audience. Because these users may not have links to aerodromes or flying clubs close to the proposed developments, the CS will rely on the NATMAC representative bodies to ensure this hard-to-reach audience can contribute to the overall engagement.

The proposed TMZ options will have no discernible impact to non-aviation stakeholders on the ground. The oversea location and airspace solution will have no impact on these groups.

The CS will receive feedback via the Feedback Form. This will be created by the CS and linked to the Engagement Document (available for download from the [CAA ACP Portal](#)), available on the SPR website, and published on SPRs social media outlets.

4 Engagement Approach

4.1 Introduction

This chapter will outline the complete engagement approach the CS will take. It will start by showing the engagement approach and period, followed by stating how we intend to notify and approach stakeholders. It will then highlight the documentation which will be produced, including the Engagement Document and Feedback Form, before outlining with how we will handle and collate all responses and finishing with a reversion statement.

4.2 Approach: How we will Engage

The engagement will be hosted on the CAA ACP Portal. The portal will host relevant information for interested parties and stakeholders, including a copy of the Engagement Document which outlines the detail of the proposed changes and potential impacts.

All engagement material will be available online and soft copies of the documentation will be available by email on request. The CS believes all our previously targeted stakeholders have internet access. Any stakeholders that are new to this ACP will be signposted to the CAA ACP Portal. The CS has not planned any face-to-face sessions during the engagement period due to the geographic location of the proposed TMZs.

Engagement via the feedback form will be available by 4 different means:

- A link contained within the Engagement Document.
- A link posted on the SPR website.
- A link shared as part of a social media post on SPR pages.
- Postal feedback form.

4.3 Engagement Period

The CS proposes a 6-week engagement period to gather stakeholder feedback regarding the introduction of the EA Hub TMZs. This period is considered adequate given the engagement activity already completed during Stage 2, the minimal response from aviation stakeholders thus far, and the geographic location of the development area. This 6-week period is also considered sufficient to allow stakeholders and aerodromes time to consider the proposals, disseminate this information to members if required, and meet to discuss the proposals before providing a response. This period also provides sufficient time for social media to assist reaching those hard-to-reach audiences.

The proposed 6-week engagement period is subject to agreement of this Engagement Strategy with the CAA. The engagement period will commence on **Monday 28th October 2024** and finish on the **Sunday 8th December 2024**. The CS would plan to extend the engagement period for an additional two weeks should SPR receive any unexpected issues or challenges following the start of the formal engagement period.

During the engagement period, all identified stakeholders will be reminded by email of the closure date for comments. This will take place three weeks prior to the end of the engagement period. The CS will also use the EA Hub project specific page on the SPR website for these reminders.

Table 2 below details the provisional dates associated with the engagement period.

Activity	Location	Provisional Date
Engagement Strategy Submission for review	CAA	30 th August 2024
Engagement Launch	CAA ACP Portal and Online Engagement Feedback Document hosting	28 th October 2024
Stakeholder Engagement	Email to NATMAC List	28 th October 2024
Social Media Launch of Engagement	SPR website and social media accounts	28 th October 2024
Stakeholder Reminders	Email, websites, and social media	18 th November 2024
Engagement Finishes	Online Engagement Feedback Document disabled	08 th December 2024

Table 2 - Provisional Engagement Programme

4.4 Engagement Notification and Advertising

To ensure interested non-aviation stakeholders are aware of the engagement and how to respond, the CS will provide information about the engagement and direct any interested stakeholders to the CAA Airspace Change Portal, on which will be the Engagement Document and feedback form. SPR will use its existing database of media outlets and online media, which will be reviewed to ensure it includes all media covering the area likely to be affected by the proposed changes. SPR will also utilise its own website to post notices that will highlight the engagement period. Following this period, a notice stating that the engagement period has closed will also be posted.

Those on the NATMAC list will be asked to disseminate details of the engagement exercise across their organisations' members which will ensure all aviation stakeholders have the opportunity to participate.

4.5 Engagement Documentation

The Engagement Document will provide clear information on the proposed change and the options that have been considered, along with details on how the final options were deemed viable to fit the mitigation requirement. This will seek to provide those engaged with sufficient information to be able to form a reasonable

understanding of the situation. The engagement material will be written in clear and accessible language and will include a non-technical explanation of the proposed changes for non-specialists.

If any individuals request further information or explanation, the CS will liaise with these stakeholders on a case-by-case basis as far as this is possible.

The Engagement Document will explain what the engagement is about, including an overview of today's environment. It will describe the proposal, including the baseline situation, the options considered and their perceived benefits and impacts. It will conclude with a description of how stakeholders can participate. Data used in the Engagement Document will be the most up-to-date and credible data available, which will be clearly referenced.

The CS considers the scale and impacts of this ACP to be small. Proposed to be built at a maritime location, there are no local population areas of concern, and any environmental impacts would be very limited. Therefore, the CS has concluded that as the impact of this development does not directly relate to any airport, and in line with CAP 1616i, it is not necessary to collect quantitative data on noise or greenhouse (GHG) emissions. The CS has completed the HRA and further environmental data is not required. Therefore, any appraisal documentation included in the Engagement Document will be based upon a qualitative assessment. However, the CS believes this qualitative assessment should be supplemented with quantitative data derived from the Aviation Study compiled at Stage 2.

4.6 Stakeholder Events

4.6.1 Frequently Asked Questions

Responses will be regularly checked as they are uploaded onto the portal. During the engagement period, a 'frequently asked questions' (FAQ) document will be developed and maintained to answer similar queries from multiple stakeholders, concerning issues not anticipated and included in the main Engagement Document. The FAQ document will be published on the CAA ACP Portal.

4.6.2 Engagement Responses

The engagement documentation will show that responses should be submitted electronically through the Engagement Feedback Form which can be accessed from within the Engagement Document. In addition, postal responses will also be accepted.

During the engagement, verbal responses will not be accepted. Any stakeholders providing verbal feedback to the CS will be encouraged to utilise the Engagement Feedback Form to capture their feedback as a formal response or send their response back using the engagement email address used during Stage 2.

4.6.3 Response Acknowledgement and Processing

Engagement responses will be acknowledged by sending a return completion message to the user through the online Engagement Feedback Document, using the e-mail address provided.

Once all stakeholder responses have been gathered, they will be categorised and made available on the CAA portal. If responses contain any commercially sensitive

data and/or personal information, this will be redacted. If material provided by the MOD has anything with a security classification, this will also be redacted.

At the end of the engagement period, the CS will collate and review the responses received and consider any comments or issues raised that might influence the final submission. As per CAP 1616h, the CS will provide an explanation of any issues raised during engagement, and its response to the identified issues, as part of the final airspace change proposal submission in Stage 4.

4.7 Reversion Statement

The Engagement Document will include a reversion statement.

The 'Do Nothing' option would not provide mitigation against radar clutter generated by the WTGs.

Should either TMZ option be approved and implemented, it would only be possible to revert to the pre-implementation state during the period ahead of wind farm erection. There would only be a small window where this would be a viable alternative, and only if a decision not to build the wind farm was taken.

Furthermore, upon implementation, but following erection of the wind farm, if the proposed changes did not fully mitigate the identified technical issues, then it would not be possible to revert to the pre-implementation state without affecting ATC operations unless a technical mitigation solution was first tested and implemented.

The proposed TMZ change would therefore need to be considered permanent, unless a technical mitigation is developed and implemented to the satisfaction of both the MOD and NATS.

5 Next Steps in the CAP 1616 Process

Following the closure of the engagement period, the CS will produce an Engagement Summary report, setting out key details of any feedback received, and highlight how this feedback will affect the final design, if applicable.

The CS will at this point also finalise the proposed design and complete/finalise the necessary safety assessments.

If significant development of the proposed design is required following full consideration of stakeholder feedback, then the CS may choose to undertake additional engagement activity.

The CS will submit the final ACP to the CAA using the relevant parts of the standard template in Annex A of CAP 1616f – Guidance on Airspace Change Process for Permanent Airspace Change Proposals.

A1 List of Stakeholders

A1.1 Introduction

The following tables represent the key stakeholder organisations and individuals identified by the CS as potentially being affected by the proposal. The CS has already engaged with all stakeholders on the CAA-provided NATMAC list during Stage 2 of the CAP 1616h process for this airspace design change.

Due to the proximity of the proposed EA Hub TMZ to the Norfolk Vanguard and Boreas OSWF developments, the CS acknowledges the requirement to keep abreast of future developments relating to these wind farms, which were acquired by Rheinisch-Westfalischen-Elektrizitatswerks (RWE) in December 2023.

For this stage of engagement activity, the CS has specifically identified local airfields on the east coast of the England, close to Great Yarmouth and Lowestoft. These are the locations closest to the development site and therefore, potentially, most likely to be affected by the developments. These organisations will be contacted to ensure they are aware of the engagement period pass on the information to any members who may wish to provide individual comment.

Table 3, Table 4, and Table 5 detail the stakeholder list identified by the CS following Stages 1 and 2.

A1.2 Aviation Stakeholders

Local Aerodrome and Aviation Organisations	
Air Ambulance (Gama Aviation)	[REDACTED]
Bristow Helicopters	[REDACTED]
CHC Helicopters	[REDACTED]
NHV	[REDACTED]
Northern Lighthouse (PDG Helicopters)	[REDACTED]
Norwich Airport	[REDACTED]
Offshore Helicopters	[REDACTED]
Police Scotland and Air Ambulance (Babcock Mission Critical Services)	[REDACTED]
RAF Lakenheath	[REDACTED]
Search and Rescue (Bristow Helicopters)	[REDACTED]

Local Aerodrome and Aviation Organisations	
Southend Airport	[REDACTED]

Table 3 - Local Aerodrome and Aviation Organisations

National Air Traffic Management Advisory Committee (NATMAC)	
Airlines UK	[REDACTED]
Airport Operators Association (AOA)	[REDACTED]
Airfield Operators Group (AOG)	[REDACTED]
Aircraft Owners and Pilots Association (AOPA)	[REDACTED]
Airspace Change Organising Group (ACOG)	[REDACTED]
Association of Remotely Piloted Aircraft Systems UK (ARPAS-UK)	[REDACTED]
Aviation Environment Federation (AEF)	[REDACTED]
British Airways (BA)	[REDACTED]
BAe Systems	[REDACTED]
British Airline Pilots Association (BALPA)	[REDACTED]
British Balloon and Airship Club	[REDACTED]
British Business and General Aviation Association (BBGA)	[REDACTED]
British Gliding Association (BGA)	[REDACTED]
British Helicopter Association (BHA)	[REDACTED]
British Microlight Aircraft Association (BMAA)	[REDACTED]
British Skydiving	[REDACTED]
Drone Major	[REDACTED]
General Aviation Alliance (GAA)	[REDACTED]

National Air Traffic Management Advisory Committee (NATMAC)	
	[REDACTED]
Guild of Air Traffic Control Officers (GATCO)	[REDACTED]
Honourable Company of Air Pilots (HCAP)	[REDACTED]
Helicopter Club of Great Britain (HCGB)	[REDACTED]
Isle of Man CAA	[REDACTED]
Light Aircraft Association (LAA)	[REDACTED]
Low Fare Airlines	[REDACTED]
Maastricht (Eurocontrol)	[REDACTED]
Military Aviation Authority (MAA)	[REDACTED]
Ministry of Defence - Defence Airspace and Air Traffic Management (MoD DAATM)	[REDACTED]
National Air Traffic Services (NATS)	[REDACTED]
Navy Command HQ	[REDACTED]
PPL/IR (Europe)	[REDACTED]
UK Airprox Board (UKAB)	[REDACTED]
UK Flight Safety Committee (UKFSC)	[REDACTED]
United States Visiting Forces (USVF), HQ United States Country Rep-UK (HQ USCR-UK)	[REDACTED]

Table 4 - NATMAC members

Air Navigation Service Providers	
DAATM (NATMAC List)	[REDACTED]
London FIS (via NATS)	National Air Traffic Services (NATS) (NATMAC List)

Table 5 - Air Navigation Service Providers