

CAA Engagement Assessment – Permanent Change

CAP 1616 – Edition 5

Title of airspace change proposal	Alignment with Dutch changes to K13A procedures in North Sea Area V
Change sponsor	NATS (On behalf of NL Ministry of Infrastructure and Water Management, Directorate-General for Civil Aviation and Maritime Affairs)
Project reference	ACP-2025-009
Account Manager	
Case study commencement date	09/09/25
Case study report as at	16/09/25

Instructions

In providing a response for each question, please ensure that the ‘status’ column is completed using the following options:

- YES
- NO
- PARTIALLY
- N/A

To aid the SARG Lead it may be useful that each question is also highlighted accordingly to illustrate what is:

resolved YES not resolved PARTIALLY not compliant ... NO ...

Executive Summary
<p>The ACP concerns the implementation of helicopter Point-in-Space (PinS) procedures to the K13-A platform, located in the Dutch Exclusive Economic Zone but within the UK London FIR, where ATS provision is delegated to the Netherlands. The change aims to ensure continued safe and reliable helicopter access to K13-A in a future environment with nearby wind farms. To align with both UK and Dutch regulatory processes, NATS En Route Limited (NERL) acted as the UK-side change sponsor, coordinating with the Dutch Ministry of Infrastructure and Water Management (IenW), who is leading the proposal under Dutch sponsorship. This pre-scaled Level 3 proposal, governed by CAP1616H, is limited to a single design option that meets all mandatory design principles and affects Class G airspace below 2000ft over the North Sea.</p> <p>Engagement was conducted with three relevant UK stakeholders: MoD DAATM, the Maritime and Coastguard Agency (MCA), and UK offshore helicopter operators (represented by HeliOffshore). Initial contact began on 30 June 2025, with the engagement formally running from 1 to 31 July 2025</p>

to allow for full participation, including a Q&A session. All three stakeholders responded. MoD confirmed negligible impact, and MCA confirmed no impact on SAR operations. HeliOffshore noted no current or near-term operational impact but highlighted that extensive design scrutiny, simulation, risk assessment, and specific regulatory approval would be required before flying the procedure. These concerns were acknowledged in the engagement summary, but no changes were made to the design, as all compliance and safety evaluation responsibilities fall under the Dutch IFP regulator. The engagement was appropriately targeted, provided sufficient information and time, and was conducted in accordance with CAP1616

PART A – Summary of Airspace Change Process to date

A.1		
A.2	Stage 1 DEFINE Gateway/Output	N/A
A.2.1		
A.3	Stage 2 DEVELOP and ASSESS Gateway/Output	N/A
A.3.1		
A.4	Stage 3 CONSULT/ENGAGE Gateway/Output	N/A
A.4.1		
A.5	Stage 4 UPDATE and SUBMIT	YES
A.5.1	The sponsor formally submitted their proposal and the required documentation.	

PART B – Engagement Assessment

B.1	AUDIENCE	
	Did the change sponsor's engagement target the right audience?	YES
B.1.1	<p>The change sponsor's engagement targeted the right audience.</p> <p>According to the change sponsor, relevant UK stakeholders included the UK Ministry of Defence (DAATM) for military aviation</p>	

	safeguarding, the Maritime and Coastguard Agency (MCA) for Search and Rescue operations, and UK offshore helicopter operators for potential commercial impacts. HeliOffshore responded on behalf of major offshore operators such as Bond-Gama Aviation, Bristow, Offshore Helicopter Services, NHV, CHC, and Uni-Fly. All relevant Dutch stakeholders were engaged separately through the Dutch airspace change process.	
	Please provide a summary of responses the sponsor received below	
B.1.2	The sponsor engaged three stakeholders namely MoD DAATM, MCA, and Heli Offshore and received responses from all. MoD confirmed negligible impact on MOD airspace users. MCA stated SAR operations would not be affected. Heli Offshore saw no impact on current or near-future operations but noted that flying the procedures would require thorough design review, regulatory approval, pilot training, and might face weather-related restrictions.	
B.2	APPROACH	
	Did the change sponsor engage stakeholders in a suitable way? If the change sponsor produced an engagement strategy, was the conduct of the engagement aligned with that strategy?	YES
B.2.1	<p>According to the change sponsor all stakeholders were professional aviation organisations with an online presence and a history of prior email communication, making email and video conferencing appropriate and effective methods of engagement.</p> <p>The change sponsor produced an engagement strategy which stated the initial plan for the engagement period to run from 1 to 22 July. However, this was later extended to 31 July to accommodate a meeting with HeliOffshore and the five UK operators, which could not be arranged within the original timeframe allowing for more stakeholder involvement.</p>	
	What steps did the change sponsor take to encourage stakeholders to participate in the engagement?	YES
B.2.2	The change sponsor took several steps to encourage stakeholder participation in the engagement. An initial launch email was sent on 30 June to notify stakeholders of the engagement process. This was followed by reminder emails to prompt responses and maintain engagement. Additionally, a Q&A session was held with UK Heli operators on 31 July 2025, providing an opportunity for direct interaction, clarification, and discussion, thereby further encouraging participation.	
B.2.3	Was the change sponsor required to respond to any unexpected events and/or challenges?	N/A
	None	
B.3	MATERIALS	
B.3.1	What materials were used by the change sponsor to engage with stakeholders?	
	The change sponsor used an email explaining the proposed change and a PowerPoint slide deck which was shared as part of the primary materials to engage with stakeholders.	


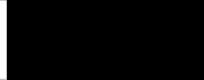


B.3.2	Did the materials provide stakeholders with enough information to ensure that they understood the issue(s) and potential impact(s) on them?	YES
	Yes, the materials provided stakeholders with enough information to ensure they understood the issues and potential impacts on them. These materials were designed to clearly communicate the nature of the change and support stakeholder understanding during the engagement process. The content was of a technical nature, appropriate for the aviation stakeholders, and sufficient to enable informed feedback and engagement.	
B.4	LENGTH	
B.4.1	Please confirm the start/end dates and the duration of the engagement below	
	The engagement started on 30 th June 2025 and ended on 31 July 2025, a period of approximately 4 weeks.	
B.4.2	What was the justification for the duration of the engagement period?	YES
	The sponsor noted that the engagement was initially planned to end on 22 July, in line with their strategy however this period was extended to 31 July to accommodate a meeting with HeliOffshore and five UK operators which could not be arranged within the original timeframe.	
B.4.3	Was the period of engagement proportionate, giving stakeholders adequate time for consideration and response?	YES
	Yes, the period of engagement was proportionate, providing stakeholders with adequate time for consideration and response, as evidenced by the fact that all stakeholders submitted their feedback.	
B.5	FEEDBACK	
B.5.1	Has the change sponsor correctly identified all the issues raised during engagement and accurately captured them in the engagement summary document?	YES
	<p>Yes, the change sponsor correctly identified all the issues raised during engagement and accurately captured them in the engagement summary document. Evidence includes three initial emails sent to stakeholders, two reminder emails requesting responses, one response and two further emails received from the key stakeholders.</p> <p>The sponsor summarised all responses in the final submission as follows:</p> <ul style="list-style-type: none"> MoD DAATM (email received 7 July 2025): Confirmed the change would likely have negligible impact on UK MOD airspace users. MCA (email received 7 July 2025): Confirmed that Search and Rescue (SAR) operations conducted under CAP 999 by Bristow Helicopters Limited would not be affected by the proposed changes. Heli Offshore (email received 5 August 2025) provided detailed responses to specific questions: <ol style="list-style-type: none"> Impact on current operations? No. 	

	<p>2. Impact on near-future operations? Unlikely, unless the 'dynamic' PinS approaches become standard in other North Sea/Irish Sea areas.</p> <p>3. Operational impacts if flying this procedure? Significant design scrutiny, simulator/flight evaluation, and risk assessments would be needed. Assessment of OEI climb performance and potential changes to the PinS approach would be required. UK CAA approval and specific pilot training would also be necessary. Additional restrictions (e.g., wind direction, icing) might apply, potentially resulting in some flight cancellations due to poor weather.</p>	
B.5.2	Does the engagement summary document detail the change sponsor's response to the identified issues? Is the change sponsor's response to the issues raised appropriate/adequate?	YES
	<p>The final submission document briefly details the change sponsor's response to the issues raised by Heli Offshore on behalf of UK offshore helicopter operators. Heli Offshore's feedback indicated no impact on current or near-future operations but highlighted that significant additional design scrutiny, simulator evaluation, risk assessments, and regulatory approvals would be required before flying the proposed procedures. They also noted potential operational restrictions due to weather and performance considerations.</p> <p>The change sponsor acknowledged these concerns and responded that no changes to the proposal were necessary at this stage. As the response needed further clarity, the change sponsor confirmed that they responded in this manner as all appropriate design compliance and safety evaluations will be conducted by the Dutch IFP regulator as part of the ACP. This regulatory oversight and evaluation process is documented in the ACP (sections 4.5–4.6). The sponsor also clarified that the UK CAA would not be the approving authority, contrary to Heli Offshore's assumption.</p> <p>While Heli Offshore's comments were fully considered and have been incorporated into the ACP, their recommendations did not lead to any modifications in the final design. The sponsor concluded that the proposed procedures comply with ICAO and EASA regulations and that no additional Letters of Agreements or amendments were required. The procedures are expected to benefit users through improved safety and accuracy, with negligible impact on other airspace users.</p> <p>Therefore, the Heli Offshore response influenced the engagement process by informing the safety evaluation and regulatory approach but did not result in changes to the final design option.</p>	
B.6	GENERAL	
B.6.1	Has the change sponsor ensured that the final airspace change proposal does not include any design elements that have not been engaged on, unless they were approved by the CAA in advance?	YES
	The change sponsor has ensured that the final ACP does not include any design elements that were not previously engaged on.	
B.6.2	Is the final airspace change proposal aligned with the conclusions of the engagement summary document?	YES

	The final airspace change proposal is aligned with the conclusions of the engagement summary in the final submission document.	
B.6.3	If there is a substantial difference between the airspace change proposal engaged on and the final design option, has the change sponsor re-engaged? If not, has the change sponsor provided a rationale why additional engagement was not required?	N/A
	N/A	
B.7	RECOMMENDATIONS/CONDITIONS/PIR DATA REQUIREMENTS	
B.7.1	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.	NO
	None	
B.7.2	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.	NO
	None	
B.7.3	If a Post Implementation Review is required, are there any additional engagement requirements in terms of the data to be collected by the change sponsor for the Post Implementation Review? If yes, please list them below.	NO
	None	
PART C – Engagement Assessment Conclusion(s)		
C.1	Does the engagement meet the CAA's regulatory requirements for this airspace change, the Government's guidance principles for consultation and the Secretary of State's Air Navigation Guidance?	YES

	<p>I am satisfied that the change sponsor has conducted the engagement in accordance with the requirements of CAP 1616 and that the engagement undertaken was aligned to the Gunning Principles. The evidence for this is summarised below:</p> <ul style="list-style-type: none"> • The engagement took place when the proposal was at a formative stage evidenced by early stakeholder contact beginning on 30 June 2025, prior to finalising the design, allowing time for meaningful input. • Sufficient information was available to enable stakeholders to give 'intelligent consideration' to the proposals evidenced by the provision of a detailed explanatory email and a technical PowerPoint slide deck outlining the proposed changes and their context. • The engagement provided an adequate time to allow for consideration and response evidenced by an engagement period running from 30th June to 31 July 2025, with initial and follow-up emails and a Q&A session held with offshore helicopter operators to encourage participation. • The change sponsors have demonstrated how they have conscientiously taken into account the feedback evidenced by the engagement summary, which documents all responses received, particularly from HeliOffshore, and explains how the feedback was addressed.
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Level 3 ACP [please delete as applicable]

PART D – Engagement Assessment sign-off			
	Name	Signature	Date
Engagement assessment completed by Airspace Regulator (Engagement and Consultation)			16/09/25
Engagement assessment conclusions peer review by Airspace Regulator (Engagement and Consultation)			16.09.2025