

STIRLINGX



Appendix C 1

STAKEHOLDER ENGAGEMENT REPORT

Norwich BVLOS Regulatory Sandbox – Phase 4 (Accommodation)

Version 0.2

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Document Control

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Executive Summary

This Stakeholder Engagement Report documents the engagement activities undertaken in support of the Stage 4 (“Update and Submit”) Airspace Change Proposal (ACP) for the Vanguard BVLOS Sandbox Temporary Reserved Area (TRA) and associated Transponder Mandatory Zone (TMZ). The report has been prepared by Global Aviation Specialists Limited on behalf of StirlingX Limited and is intended to provide a complete, auditable record of engagement in accordance with the requirements and principles set out in CAP1616 (Edition g).

The Vanguard BVLOS Sandbox is a multi-phase regulatory trial designed to support the safe integration of Beyond Visual Line of Sight (BVLOS) unmanned aircraft operations into UK airspace. Phase 4 of the sandbox (“Accommodation”) represents a transition from reliance on visual observer mitigation to the validation of airspace-based strategic mitigations. To support this phase, StirlingX has proposed a temporary, tactically activated airspace construct comprising a TRA supported by a TMZ, activated by NOTAM and managed in coordination with Norwich Air Traffic Control (ATC).

Stakeholder engagement was planned and executed in a structured and proportionate manner, reflecting the temporary and trial-based nature of the proposal. Engagement focused on aviation stakeholders and representative forums with a direct operational interest in the affected airspace, including the Civil Aviation Authority (CAA), Norwich ATC, national and regional airspace user groups, general aviation and specialist aviation users, emergency services, and military stakeholders.

Engagement activities included early informal discussions, publication of a formal Consultation Strategy, issuance of a detailed Consultation Pack, circulation via representative forums (including NATMAC and EEAUWG), direct consultation correspondence, and targeted bilateral engagement where specific concerns were identified. Formal Letters of Agreement were established with key emergency service, military, and ANSP stakeholders to confirm coordination, access priorities, and procedures.

A small number of localised operational concerns were raised during the consultation period, primarily relating to gliding, hang gliding, and paragliding activity in the vicinity of the proposed corridor. These concerns were addressed through targeted engagement and resulted in refinements to the proposal, including clarification of altitude limits, local buffers, and activation arrangements. Stakeholders subsequently confirmed that their concerns had been satisfactorily resolved.

No objections to the principle of the proposed TRA/TMZ or BVLOS sandbox activity remain unresolved. Engagement outcomes support the final airspace design submitted at Stage 4 and demonstrate that engagement has been completed in a manner that is transparent, proportionate, and consistent with CAP1616 requirements.



Section 1 Purpose of the Stakeholder Engagement Report

The purpose of this Stakeholder Engagement Report is to provide formal evidence that stakeholder engagement supporting the Vanguard BVLOS Sandbox Temporary Reserved Area (TRA) and associated Transponder Mandatory Zone (TMZ) has been undertaken in accordance with the Airspace Change Process defined in CAP1616 (Edition g).

Specifically, this report is intended to demonstrate that:

- Stakeholders with a legitimate interest in, or potential impact from, the proposed temporary airspace arrangements were appropriately identified.
- Engagement activities were planned, proportionate, and structured.
- Stakeholders were provided with sufficient information to understand the proposal and its operational implications.
- Stakeholders were given a reasonable opportunity to raise questions, concerns, or objections.
- Feedback received during engagement was reviewed, assessed, and addressed by the Change Sponsor.
- The final proposal submitted at Stage 4 reflects the outcomes of engagement undertaken during earlier stages of the ACP process.

This report supports the CAA's assessment at Stage 5 by providing a transparent audit trail of engagement activity and outcomes.



Section 2 Scope

The scope of stakeholder engagement documented in this report covers the period from early informal engagement activities supporting the Statement of Need through to the conclusion of formal consultation and targeted bilateral engagement undertaken prior to Stage 4 submission.

The engagement scope includes:

- Early informal discussions with aviation stakeholders to identify potential constraints and inform development of the proposal.
- Development and publication of a formal Consultation Strategy defining engagement objectives, audiences, methods, and timelines.
- Issuance and circulation of a Consultation Pack setting out the proposed airspace design, activation arrangements, and safety rationale.
- Engagement via representative aviation forums, including NATMAC and the East of England Airspace User Working Group (EEAUWG).
- Direct consultation correspondence with affected stakeholders.
- Targeted bilateral engagement with specific organisations where localised concerns were identified.
- Establishment of formal Letters of Agreement with emergency services, military stakeholders, and the relevant Air Navigation Service Provider.

This report does not reproduce technical, operational, or safety assessments contained within the Concept of Operations (ConOps), SORA documentation, or operational safety cases. Those documents are referenced where relevant, but the focus of this report is limited to stakeholder engagement activities and their influence on the final airspace design.

In addition to the formal consultation activities described within this report, engagement relating to the Vanguard BVLOS Sandbox has formed part of a longer-term programme of structured multi-stakeholder engagement across East Anglia.

Since 2021, relevant airspace stakeholders have participated in discussions through the East Anglia Airspace Users Working Group (EEAUWG) and related forums, which have informed the evolution of BVLOS integration concepts and associated airspace design principles.



Section 3 Regulatory and Policy Context

Stakeholder engagement for this proposal has been conducted in accordance with the Airspace Change Process defined in CAP1616 (Edition g). The engagement activities documented in this report support the requirements of Stage 2 (Develop and Assess), Stage 3 (Consult), and Stage 4 (Update and Submit) of the ACP process.

CAP1616 emphasises that engagement should be proportionate to the scale, permanence, and impact of the proposed change. The Vanguard BVLOS Sandbox proposal relates to a temporary, tactically activated airspace construct designed to support a regulatory sandbox trial, rather than a permanent change to airspace classification or structure. Accordingly, the engagement approach focused on stakeholders with a direct operational interest in the affected airspace.

A formal Consultation Strategy was developed and published to define engagement objectives, stakeholder groups, consultation mechanisms, and timelines. This strategy provided a transparent framework against which engagement activities were planned, executed, and subsequently assessed prior to Stage 4 submission.

Section 4 Stakeholder Identification and Categorisation

Stakeholder identification was undertaken using a structured and systematic approach aligned with CAP1616 guidance and informed by the operational characteristics of the proposed airspace.

Stakeholders were categorised according to their relationship to, or use of, the affected airspace and the potential impact of TRA/TMZ activation on their activities.

4.1 Regulatory and Oversight Stakeholders

The Civil Aviation Authority (CAA) was identified as the primary regulatory stakeholder, with oversight of both the airspace change process and the BVLOS sandbox activity. Engagement with the CAA occurred throughout the development of the proposal via the ACP process and sandbox governance mechanisms.

4.2 Air Navigation Service Provider

Norwich Air Traffic Control (ATC), as the relevant Air Navigation Service Provider, was identified as a critical stakeholder due to its role in managing the airspace during TRA/TMZ activation. Engagement focused on activation procedures, communications, operational authority, and the interface between ATC and BVLOS operations.



4.3 Representative Aviation Forums

Representative forums were identified as key engagement channels to ensure proportionate engagement with a wide range of airspace users. These included the National Air Traffic Management Advisory Committee (NATMAC) and the East of England Airspace User Working Group (EEAUWG). Consultation material was circulated via these forums to enable representative bodies to review and respond on behalf of their members.

4.4 General Aviation and Specialist Aviation Users

General aviation and specialist aviation users were identified based on known activity within and around the affected airspace. This included gliding organisations and clubs, hang gliding and paragliding groups, and local GA operators. Where specific concerns were raised, targeted bilateral engagement was undertaken.

4.5 Emergency Services and State Operators

Emergency services and state operators were identified as priority stakeholders due to the requirement to maintain unrestricted access and operational flexibility. Engagement included East Anglian Air Ambulance, the National Police Air Service, the National Police Chiefs' Council, and Ministry of Defence stakeholders including RAF Marham. Engagement resulted in formal Letters of Agreement confirming coordination and priority procedures.

Section 5 Stakeholder Engagement Strategy and Methodology

5.1 Overview of the Engagement Strategy

Stakeholder engagement for the Vanguard BVLOS Sandbox Temporary Reserved Area (TRA) and associated Transponder Mandatory Zone (TMZ) was conducted in accordance with a defined and published Consultation Strategy developed by StirlingX Limited.

Engagement commenced in 2021 through the East Anglia Airspace Users Working Group (EEAUWG), which has operated as the primary multi-stakeholder forum for collaborative airspace management in the region.

Across successive meetings, site visits, operational briefings, technical workshops and direct correspondence, stakeholders have provided operational insight, identified safety considerations and contributed feedback that has informed the development of the ACP design principles and associated Letters of Agreement (LoAs).

The engagement process has been iterative, enabling stakeholders to review emerging concepts and mitigation measures prior to submission at Stage 4.



The Consultation Strategy established the framework within which engagement activities were planned and executed, including the objectives of engagement, identification of stakeholder groups, consultation mechanisms, timelines, and methods for collecting and analysing feedback.

The strategy was issued alongside the Consultation Pack to ensure that stakeholders clearly understood both the substance of the proposal and the process through which their views would be considered.

The engagement approach recognised that the proposed airspace change is temporary, trial-based, and tactically activated, and therefore does not warrant the same breadth of public engagement as a permanent airspace change. Instead, engagement focused on aviation stakeholders and organisations with a direct operational interest in the affected airspace.

Engagement supporting this ACP has not been limited to the formal consultation period. Since 2021, the East Anglia Airspace Users Working Group (EAAUWG) has provided a structured multi-stakeholder forum through which emerging BVLOS integration concepts, airspace constraints, and safety considerations have been discussed.

This iterative engagement allowed operational stakeholders — including RAF Marham, Norwich Airport, emergency services, police aviation representatives, general aviation groups and UAS sector participants — to provide early operational input prior to formal consultation.

5.2 Engagement Objectives

The engagement strategy was developed to meet the following objectives:

- To inform stakeholders of the purpose and scope of the Vanguard BVLOS Sandbox and the proposed TRA/TMZ arrangements.
- To explain how and when the airspace would be activated, managed, and deactivated.
- To describe the safety, coordination, and mitigation measures supporting BVLOS operations.
- To provide stakeholders with sufficient information to identify any potential impacts on their operations.
- To offer a clear and accessible mechanism for stakeholders to raise questions, concerns, or objections.
- To use feedback received to refine the proposal where appropriate prior to Stage 4 submission.

These objectives were aligned with CAP1616 expectations that engagement should enable meaningful input from affected stakeholders and demonstrate that feedback has been actively considered.



5.3 Proportionality and Engagement Scope

In determining the appropriate scope and depth of engagement, StirlingX considered the following factors:

- The temporary and time-limited nature of the proposed TRA/TMZ.
- The tactical activation of the airspace via NOTAM rather than permanent reclassification.
- The absence of changes to instrument flight procedures or controlled airspace boundaries.
- The presence of established coordination arrangements with the relevant ANSP.

Based on these considerations, engagement was designed to prioritise:

- Aviation stakeholders operating within or transiting the affected airspace.
- Representative forums capable of reflecting the views of wider user groups.
- Emergency services and state operators requiring assured access.

This proportional approach is consistent with CAP1616 guidance for temporary or trial airspace changes.

5.4 Engagement Methods and Mechanisms

A range of engagement methods were employed to ensure accessibility and effectiveness, including:

5.4.1 Formal Written Consultation

A comprehensive Consultation Pack was produced and issued, setting out the proposed airspace design, operational concept, activation arrangements, safety mitigations, and points of contact. This formed the primary reference document for stakeholders during the consultation period.

5.4.2 Representative Forum Engagement

Consultation material was circulated via established representative forums, including NATMAC and the East of England Airspace User Working Group (EEAUWG). This approach enabled engagement with a broad range of aviation users in a proportionate manner, while leveraging existing governance and communication structures.

5.4.3 Direct Correspondence

Consultation emails were issued directly to identified stakeholders, including emergency services, military organisations, and aviation bodies. Follow-up correspondence was undertaken where clarification was requested or responses were received.



5.4.4 Targeted Bilateral Engagement

Where specific concerns were raised by individual organisations, targeted bilateral engagement was undertaken. This included meetings and direct correspondence with affected stakeholders to ensure that local operational practices and sensitivities were fully understood.

5.4.5 Formal Agreements

For stakeholders requiring formalised coordination arrangements, Letters of Agreement were developed and signed. These documents provide enduring clarity on roles, responsibilities, and procedures during TRA/TMZ activation.

5.4.6 Formal Agreements

The East Anglia Airspace Users Working Group (EAAUWG) has operated as a recurring regional engagement forum hosted by RAF Marham. Meetings were held in July 2021, June 2022, January 2023, July 2023, January 2024 and June 2024.

These sessions included operational briefings, airspace design discussions, safety presentations and structured stakeholder feedback. Topics included Lightning Force operations, MATZ integration, emergency service access, glider activity, UAS integration and vertical airspace segmentation concepts.

The EAAUWG forum provided an iterative environment in which developing ACP principles were presented, challenged and refined prior to Stage 4 submission.

5.5 Consultation Timeline

The stakeholder engagement and consultation activities for the Vanguard BVLOS Sandbox Temporary Reserved Area (TRA) and associated Transponder Mandatory Zone (TMZ) were undertaken in accordance with the published Consultation Strategy and followed a clearly defined and structured timeline.

Early informal engagement took place during development of the Statement of Need, prior to the launch of formal consultation. This early engagement included preliminary discussions with aviation stakeholders, emergency service operators, and military representatives to identify potential operational sensitivities and inform the initial shaping of the proposal.

Formal consultation commenced following completion of the Consultation Pack and Consultation Strategy. The consultation material was issued to stakeholders via direct email distribution and through established representative forums, including the National Air Traffic Management Advisory Committee (NATMAC) and the East of England Airspace User Working Group (EAAUWG). Distribution lists and circulation records demonstrate that consultation material was disseminated to a broad range of aviation stakeholders with potential interest in, or interaction with, the affected airspace.



The formal consultation period remained open for approximately eight weeks, in line with the timeline defined in the Consultation Strategy. During this period, stakeholders were invited to review the proposal and submit comments, questions, or concerns via direct correspondence or through representative forum channels. A QR-code-based feedback mechanism was also made available to facilitate structured submission of feedback.

During the consultation window, responses were received from a range of stakeholders, including representative bodies, emergency services, and specialist aviation users. Where clarification was requested, StirlingX provided follow-up responses to ensure stakeholders had a clear understanding of the proposal, particularly in relation to activation procedures, altitude limits, and access arrangements.

In parallel with the formal consultation, targeted bilateral engagement was undertaken where specific concerns were identified. Notably, this included direct correspondence and a meeting with the Norfolk Hang Gliding and Paragliding Club (NHGPC) during August and September 2025, following the identification of localised concerns relating to awareness and potential interaction with gliding and paragliding activity. This engagement resulted in clarification of operating arrangements and refinement of local buffers, after which NHGPC confirmed that its concerns had been satisfactorily addressed.

Engagement with military and emergency service stakeholders continued throughout and beyond the formal consultation period, culminating in written responses and formal Letters of Agreement during October and November 2025. These documents confirmed agreed coordination procedures, priority access arrangements, and support for the proposed temporary airspace construct.

Following closure of the consultation period, all feedback received was reviewed and assessed by StirlingX and its advisers. Engagement outcomes were consolidated, and the proposal was reviewed to confirm that issues raised had been addressed and that no unresolved objections remained.

This review informed the final update of the airspace design and supporting documentation prior to Stage 4 submission.

5.6 Feedback Collection and Analysis

Feedback was collected through multiple channels, including written responses to consultation emails, comments submitted via representative forums, and notes from bilateral meetings. All feedback received was reviewed by StirlingX and its advisers to determine:

- Whether issues raised related to safety, access, or operational compatibility.
- Whether concerns could be addressed through clarification, procedural refinement, or design modification.
- Whether any objections represented fundamental opposition to the proposal.

Where appropriate, responses were provided to stakeholders to explain how their feedback had been considered and to confirm any resulting changes.



5.7 Integration of Engagement Outcomes

Engagement outcomes were integrated into the final proposal prior to Stage 4 submission. This included:

- Refinement of local buffers and clarification of altitude limits in response to gliding and paragliding concerns.
- Reinforcement of activation, notification, and coordination procedures.
- Formalisation of access and priority arrangements through Letters of Agreement.

The engagement process therefore directly influenced the final airspace design and operating procedures submitted to the CAA.



Section 6 Chronology of Stakeholder Engagement Activities

This section provides a chronological account of stakeholder engagement undertaken in support of the Vanguard BVLOS Sandbox Temporary Reserved Area (TRA) and associated Transponder Mandatory Zone (TMZ).

The chronology demonstrates how engagement evolved from early informal discussions through formal consultation and targeted bilateral engagement, and how feedback received during this process informed refinement of the final proposal submitted at Stage 4.

6.1 Early Informal Engagement and Development of the Statement of Need

Early informal engagement was undertaken during the development of the Statement of Need to identify potential operational constraints, sensitivities, and stakeholder interests associated with BVLOS activity in the proposed area of operation. This phase focused on establishing whether a temporary, tactically activated airspace construct would be feasible and acceptable in principle.

During this period, StirlingX engaged informally with aviation stakeholders, emergency service operators, and military representatives through existing professional and operational channels. These discussions were used to confirm that a temporary TRA/TMZ construct, activated by NOTAM and managed in coordination with Norwich ATC, would be preferable to permanent airspace changes and could be progressed within the regulatory sandbox framework.

Engagement activities from 2021 onwards included structured discussions through EAAUWG hosted by RAF Marham. These sessions included detailed operational briefings from RAF Marham regarding Lightning Force activity, runway utilisation, TAC Admin profiles and coordination requirements associated with increased F-35 operations.

These discussions informed the evolving Statement of Need and highlighted the requirement for airspace structures capable of supporting both military and BVLOS integration objectives.

The outcomes of this early engagement informed the scope and rationale set out in the Statement of Need and provided the foundation for development of the Concept of Operations (ConOps) and Consultation Strategy.



6.2 Development and Publication of the Consultation Strategy and Consultation Pack

Following completion of the ConOps and supporting documentation, StirlingX developed a formal Consultation Strategy to define the objectives, scope, stakeholder groups, engagement methods, and consultation timeline for the proposal. The strategy explicitly recognised the temporary and trial-based nature of the airspace change and set out a proportionate engagement approach consistent with CAP1616 guidance.

In parallel, a detailed Consultation Pack was produced to support formal consultation. The Consultation Pack set out:

- The purpose and objectives of the Vanguard BVLOS Sandbox.
- The proposed TRA and TMZ design and geographic extent.
- Activation and deactivation arrangements, including use of NOTAM.
- The operational interface with Norwich ATC.
- High-level safety and mitigation considerations.
- Instructions on how stakeholders could submit feedback.

The Consultation Strategy and Consultation Pack were issued together to ensure that stakeholders were able to understand both the substance of the proposal and the process through which engagement would be conducted.

6.3 Formal Consultation Launch and Distribution

Formal consultation commenced following publication of the Consultation Strategy and Consultation Pack. Consultation material was distributed through multiple channels to ensure appropriate coverage of affected and interested stakeholders.

Direct consultation emails were issued to identified stakeholders, including emergency services, military organisations, aviation bodies, and representative groups. In addition, consultation material was circulated via established representative forums, notably the National Air Traffic Management Advisory Committee (NATMAC) and the East of England Airspace User Working Group (EEAUWG). Distribution lists and circulation records demonstrate that the material was disseminated to a broad audience representing commercial aviation, general aviation, and specialist aviation interests.

The consultation launch clearly identified the consultation window, the means by which feedback could be submitted, and points of contact for further information. A QR-code-based feedback mechanism linking to a stakeholder information page on the StirlingX website was also provided to facilitate structured responses.



6.4 Consultation Period and Stakeholder Responses

During the formal consultation period, responses were received from a range of stakeholders, including representative organisations and individual aviation users. Feedback primarily related to:

- Awareness of the proposed TRA/TMZ.
- Activation and notification arrangements.
- Potential interaction with local aviation activities.
- Assurance of continued access for emergency and state aircraft.

Where stakeholders requested clarification, StirlingX responded through follow-up correspondence to ensure that the proposal was fully understood. This included clarifying the temporary nature of the airspace, the tactical activation by NOTAM, and the role of Norwich ATC in managing the airspace during activation.

Responses received during the consultation period were logged and reviewed to determine whether issues raised represented requests for clarification, operational concerns that could be mitigated, or fundamental objections to the proposal.

6.5 Targeted Bilateral Engagement with Specialist Aviation Users

During the consultation period, specific localised concerns were raised by the Norfolk Hang Gliding and Paragliding Club (NHGPC) regarding awareness of the proposal and potential interaction with hang gliding and paragliding activity in the vicinity of the proposed corridor.

In response, StirlingX undertook targeted bilateral engagement with NHGPC, including direct correspondence and a meeting during August and September 2025. This engagement enabled StirlingX to gain a detailed understanding of local operating practices, launch sites, and seasonal activity patterns.

As a result of this engagement, additional clarification was provided regarding altitude limits, activation arrangements, and the use of NOTAMs, and local buffers were refined to provide additional reassurance. Following these discussions, NHGPC confirmed in writing that its concerns had been satisfactorily addressed and that the revised proposal was acceptable.

This bilateral engagement is considered a clear example of stakeholder feedback directly influencing refinement of the proposal.

6.6 Engagement with Emergency Services and State Operators

Engagement with emergency services and state operators was undertaken in parallel with formal consultation and continued throughout the engagement period. This engagement focused on ensuring that emergency response and national security operations would not be adversely affected by TRA/TMZ activation.

Specific engagement was undertaken with:



- East Anglian Air Ambulance.
- National Police Air Service (NPAS).
- National Police Chiefs' Council (NPCC).
- Ministry of Defence stakeholders, including RAF Marham.

Correspondence and meetings focused on confirming priority access arrangements, procedures for immediate suspension of BVLOS operations if required, and coordination protocols. This engagement culminated in the development and signature of formal Letters of Agreement, providing written confirmation of agreed procedures and support for the proposed temporary airspace arrangements.

East Anglian Air Ambulance (Babcock) participated in multiple EAAUWG meetings, including detailed briefings in July 2023 outlining HEMS response profiles, altitudes, and operational risks associated with drone interaction and low-level route access.

Further engagement in January 2024 reinforced the need for predictable coordination mechanisms and rapid access arrangements during emergency tasking.

Police aviation considerations were raised through Norfolk Police participation in January 2024 discussions, including coordination requirements with RAF Lakenheath and RAF Mildenhall and regional tasking unpredictability.

6.7 Engagement with Norwich Air Traffic Control

Norwich Airport and Norwich ATC have participated consistently in EAAUWG discussions throughout the 2021–2024 period. Engagement included operational updates regarding offshore helicopter activity, radar coverage considerations and airspace interactions north of Norwich.

Engagement with Norwich ATC continued through the development of the proposal and consultation process. This engagement focused on the operational interface between BVLOS operations and conventional air traffic services, including activation authority, communications, and deconfliction procedures.

A formal Letter of Agreement was developed and agreed between StirlingX and Norwich ATC, documenting the roles and responsibilities of each party during TRA/TMZ activation and confirming Norwich ATC's support for the proposed arrangements.

6.8 Consultation Closure and Review of Outcomes

Following closure of the formal consultation period, all feedback received through consultation, correspondence, and bilateral engagement was reviewed by StirlingX and its advisers. Engagement outcomes were assessed to confirm:

- Whether concerns raised had been adequately addressed.
- Whether any objections remained unresolved.
- Whether further engagement was required prior to Stage 4 submission.



This review confirmed that a small number of localised operational concerns had been identified and resolved, that no objections to the principle of the proposal remained, and that engagement could be considered complete for the purposes of Stage 4.

The outcomes of this review informed the final update of the airspace design and supporting documentation submitted to the CAA.

Section 7 Issues Raised and Responses

This section provides a detailed account of issues, questions, and concerns raised by stakeholders during the engagement and consultation process, together with the responses provided by StirlingX and the resulting outcomes. The purpose of this section is to demonstrate transparent consideration of stakeholder feedback and to evidence how engagement outcomes informed refinement of the final proposal.

The issues detailed below were raised during the formal consultation period. These issues were considered in the context of the broader multi-year engagement programme described in Sections 5 and 6.

Issues are grouped by stakeholder category to reflect the engagement structure described in Sections 4 to 6.

7.1 Gliding, Hang Gliding, and Paragliding Organisations

7.1.1 Issue Raised – Awareness and Local Activity Interaction

During the formal consultation period, the Norfolk Hang Gliding and Paragliding Club (NHGPC) raised concerns regarding initial awareness of the proposal and potential interaction between hang gliding/paragliding activity and the proposed TRA/TMZ. Correspondence indicated that members were seeking reassurance that local operating practices, launch locations, and typical activity altitudes had been adequately considered.

This issue was raised through direct email correspondence during August 2025 and subsequently discussed in more detail during a bilateral meeting between StirlingX representatives and NHGPC.

7.1.2 Response and Engagement

In response, StirlingX undertook targeted bilateral engagement with NHGPC, including:

- Direct correspondence to clarify the objectives and temporary nature of the TRA/TMZ.
- Provision of additional detail regarding activation arrangements, altitude limits, and use of NOTAMs.
- A dedicated meeting to discuss local hang gliding and paragliding activity, launch sites, and seasonal operating patterns.



During this engagement, StirlingX clarified that the TRA/TMZ would be tactically activated for defined periods only, with advance notification provided via NOTAM, and that BVLOS operations would be conducted within defined vertical limits that avoided typical hang gliding and paragliding operating altitudes.

7.1.3 Resolution and Outcome

As a result of this engagement:

- Local buffers around known activity areas were refined.
- Explanatory material was clarified to improve stakeholder understanding of activation and deactivation arrangements.
- Reassurance was provided regarding coordination with ATC and the ability to suspend activity if required.

Following these discussions, NHGPC confirmed in writing that its concerns had been satisfactorily addressed and that the revised proposal was acceptable. No objection to the principle of the proposal remained outstanding.

This issue is therefore considered **resolved**.

7.2 General Aviation Stakeholders

7.2.1 Issue Raised – Access and Predictability of Airspace Use

Feedback received via representative forums, including NATMAC and the East of England Airspace User Working Group (EEAUWG), included requests for clarification regarding how activation of the TRA/TMZ would affect general aviation access and whether the proposal would introduce unpredictable or prolonged restrictions.

These comments did not constitute objections to the proposal but reflected a desire for clarity regarding operational impact and notification arrangements.

7.2.2 Response and Engagement

In response, StirlingX provided clarification through consultation correspondence and forum engagement, explaining that:

- The TRA/TMZ would be activated tactically via NOTAM rather than permanently established.
- Activation would be limited in duration and linked to specific BVLOS trial activity.
- Equipage-based access criteria would apply during activation.
- Norwich ATC would manage the airspace during activation, providing a clear point of coordination.

Additional explanatory material was circulated where required to reinforce these points.



7.2.3 Resolution and Outcome

Following clarification, no objections were raised by general aviation stakeholders through representative forums. Feedback indicated that once activation and notification arrangements were understood, the proposal was considered acceptable and proportionate for a temporary trial.

This issue is therefore considered **resolved**.

7.3 Emergency Services

7.3.1 Issue Raised – Priority Access and Operational Flexibility

Emergency service stakeholders, including East Anglian Air Ambulance, National Police Air Service (NPAS), and National Police Chiefs' Council (NPCC), sought assurance that activation of the TRA/TMZ would not impede emergency response operations and that priority access would be maintained at all times.

This issue was raised during consultation correspondence and follow-up engagement.

7.3.2 Response and Engagement

StirlingX engaged directly with emergency service stakeholders to:

- Explain the temporary and suspendable nature of the TRA/TMZ.
- Confirm that BVLOS operations would be immediately suspended if required for emergency activity.
- Define coordination and notification procedures.

This engagement resulted in the development and agreement of formal Letters of Agreement with the relevant organisations, documenting agreed procedures and priorities.

7.3.3 Resolution and Outcome

The signed Letters of Agreement confirm that emergency service stakeholders are satisfied with the proposed arrangements and that their operational requirements are fully accommodated.

No objections or unresolved concerns were raised following agreement of these documents. This issue is therefore considered **resolved**.



7.4 Military Stakeholders

7.4.1 Issue Raised – Compatibility with Military Operations

The Ministry of Defence, including RAF Marham, required assurance that the proposed TRA/TMZ would not adversely affect military training or operational activity, and that coordination mechanisms would be robust.

This issue was raised through consultation correspondence and MOD engagement channels.

7.4.2 Response and Engagement

Engagement with MOD stakeholders focused on:

- explaining the scope and activation of the TRA/TMZ;
- confirming notification arrangements and coordination procedures;
- ensuring that military activity would retain priority access.

This engagement culminated in a formal Letter of Agreement confirming agreed procedures.

7.4.3 Resolution and Outcome

The MOD response and signed Letter of Agreement confirm acceptance of the proposed arrangements and provide written evidence of support for the temporary airspace construct.

No unresolved concerns remain. This issue is therefore considered **resolved**.

7.5 Air Navigation Service Provider (Norwich ATC)

7.5.1 Issue Raised – Operational Interface and Authority

Norwich ATC required clarity regarding its role, authority, and responsibilities during activation of the TRA/TMZ, including communications, suspension authority, and coordination with BVLOS operations.

7.5.2 Response and Engagement

StirlingX engaged continuously with Norwich ATC throughout proposal development, including meetings, a tabletop exercise and correspondence to define operational procedures. This engagement resulted in a formal Letter of Agreement documenting:

- Activation and deactivation processes.
- Communication protocols.
- ATC authority to suspend or terminate BVLOS activity if required.



7.5.3 Resolution and Outcome

The agreed Letter of Agreement confirms Norwich ATC's support for the proposed arrangements and provides clear operational governance.

No objections or unresolved concerns remain. This issue is therefore considered **resolved**.

7.6 Summary of Issues and Closure Status

In summary:

- A small number of localised operational concerns were raised during engagement.
- All issues were addressed through clarification, refinement of the proposal, or formal agreement.
- No stakeholder raised an unresolved objection to the principle of the proposed TRA/TMZ.
- All issues are considered closed at the point of Stage 4 submission.

Section 8 Letters of Agreement and Formal Endorsements

This section summarises the formal Letters of Agreement (LoAs) or Record of Agreement (RoA) and written endorsements established with key stakeholders during the engagement process.

These agreements provide documented assurance that coordination arrangements, access priorities, and operational interfaces have been agreed and that stakeholder requirements have been addressed prior to Stage 4 submission.

LoAs and RoAs form a critical part of the engagement outcome, converting consultation dialogue into formalised operational commitments and providing enduring clarity for all parties involved.

The following formal agreements and endorsements were developed following iterative engagement activity undertaken between 2021 and 2024, including EAAUWG meetings, bilateral discussions and formal consultation.

8.1 Norwich Air Traffic Control (ANSP)

A formal Letter of Agreement was established between StirlingX Limited and Norwich Air Traffic Control to define the operational interface between BVLOS operations conducted within the Vanguard Sandbox and conventional air traffic services.

The LoA documents:



- The procedures for activation and deactivation of the Temporary Reserved Area (TRA) and associated Transponder Mandatory Zone (TMZ);
- Communication requirements between StirlingX Remote Pilots and Norwich ATC.
- ATC authority to suspend or terminate BVLOS operations at any time in the interests of safety or operational priority.
- Coordination arrangements for emergency service and military access during TRA/TMZ activation.

The agreement confirms Norwich ATC's support for the proposed temporary airspace arrangements and provides a clear governance framework for ATC involvement during sandbox operations.

8.2 East Anglian Air Ambulance (EAAA)

A Record of Agreement was established with East Anglian Air Ambulance (Babcock International Group) to ensure that emergency medical helicopter operations retain unrestricted priority access to the airspace at all times.

The RoA confirms:

- That EAAA *Blue Light* operations take priority over BVLOS activity.
- That BVLOS operations will be immediately suspended if required to facilitate emergency missions.
- Agreed coordination and notification procedures to support safe coexistence during TRA/TMZ activation.

This agreement provides written assurance that emergency medical services are not adversely affected by the proposed airspace construct.

8.3 National Police Air Service (NPAS) and National Police Chiefs' Council (NPCC)

Letters of Agreement were established with the National Police Air Service (NPAS) and the National Police Chiefs' Council (NPCC) to address law enforcement aviation requirements.

These agreements confirm:

- Priority access for *Blue Light* police aviation operations.
- Procedures for immediate suspension of BVLOS activity in support of policing or public safety operations.
- Communication and coordination arrangements during TRA/TMZ activation.

The LoAs provide formal assurance that police aviation requirements have been fully considered and accommodated.



8.4 Ministry of Defence / RAF Marham

Engagement with the Ministry of Defence, including RAF Marham, resulted in a formal Letter of Agreement confirming compatibility between the proposed TRA/TMZ and military operations.

The agreement addresses:

- Notification and coordination arrangements.
- Priority access for military aircraft.
- Procedures for managing potential interaction between BVLOS activity and military training or operational flights.

The LoA provides written confirmation that military stakeholders have reviewed the proposal and are satisfied with the arrangements for the temporary trial.

8.5 Summary of Formal Endorsements

Collectively, Letters and Records of Agreement provide strong evidence that:

- key operational stakeholders have been actively engaged.
- Stakeholder requirements have been translated into formal procedures.
- Emergency, state, and ANSP operations retain priority and authority.
- No unresolved objections remain at the point of Stage 4 submission.

LoAs and RoAs form part of the supporting evidence submitted alongside the ACP and underpin the conclusion that stakeholder engagement has been completed and closed in accordance with CAP1616 requirements.

Section 9 Assessment of Stakeholder Engagement Outcomes

This section provides an assessment of the outcomes of the stakeholder engagement process and considers whether the objectives set out in the Consultation Strategy have been met, whether stakeholder feedback has been appropriately addressed, and whether the engagement process supports progression of the Airspace Change Proposal to Stage 5.

9.1 Achievement of Engagement Objectives

The engagement objectives defined in the Consultation Strategy have been met. Stakeholders with a direct operational interest in the affected airspace were identified and engaged through a combination of representative forums, direct consultation, and targeted bilateral engagement. Stakeholders were provided with sufficient information to understand the nature of the Vanguard BVLOS Sandbox, the proposed Temporary Reserved Area and



Transponder Mandatory Zone, and the operational and safety arrangements supporting the trial.

Mechanisms were provided to allow stakeholders to submit feedback, request clarification, and raise concerns. Where feedback was received, StirlingX engaged constructively and transparently to address issues and, where appropriate, refine the proposal prior to Stage 4 submission.

Engagement outcomes demonstrate that key operational stakeholders — including RAF Marham, Norwich Airport, East Anglian Air Ambulance, police aviation representatives and UAS sector participants — were engaged prior to formalisation of Letters of Agreement. Their operational input directly informed airspace design refinements, mitigation measures and coordination procedures.

9.2 Proportionality and Appropriateness of Engagement

The engagement approach adopted was proportionate to the temporary and trial-based nature of the proposed airspace change. The proposal does not introduce permanent airspace classification changes, instrument flight procedures, or enduring restrictions on airspace users. Activation of the TRA/TMZ is tactical, time-limited, and subject to suspension or cancellation.

In this context, engagement focused appropriately on aviation stakeholders and organisations with a direct operational interest, rather than undertaking broad public consultation more suited to permanent changes. The use of representative forums, including NATMAC and EEAUWG, ensured wide stakeholder coverage while remaining proportionate and efficient.

9.3 Consideration and Resolution of Stakeholder Feedback

A small number of localised operational concerns were identified during the engagement process, primarily relating to awareness and potential interaction with gliding, hang gliding, and paragliding activity. These concerns were addressed through targeted bilateral engagement, resulting in clarification of operating arrangements and refinement of local buffers and activation procedures.

Other feedback received focused on requests for clarification rather than objections, particularly in relation to activation, notification, and access arrangements. These matters were addressed through follow-up correspondence and clarification of the temporary and managed nature of the proposed airspace.

Engagement with emergency services, military stakeholders, and the relevant Air Navigation Service Provider resulted in formal Letters of Agreement that document agreed coordination and priority arrangements. These agreements provide strong assurance that stakeholder requirements have been addressed and that operational compatibility has been achieved.



9.4 Residual Issues and Objections

At the conclusion of the engagement process, no unresolved objections to the principle of the proposed Temporary Reserved Area or Transponder Mandatory Zone remain. All issues raised during consultation have been addressed, and stakeholders have confirmed satisfaction with the revised proposal and associated procedures.

No unresolved objections remain following the conclusion of formal consultation and associated bilateral engagement.



Section 10 Engagement Closure Statement and Conclusion

Stakeholder engagement for the Vanguard BVLOS Sandbox Temporary Reserved Area and associated Transponder Mandatory Zone has been conducted in a structured, transparent, and proportionate manner consistent with the requirements and principles of CAP1616.

The engagement process:

- Identified and engaged relevant stakeholders with a direct operational interest in the affected airspace.
- Provided stakeholders with sufficient information to understand the proposal and its implications.
- Enabled stakeholders to raise questions, concerns, and requests for clarification.
- Resulted in targeted engagement and refinement of the proposal where localised concerns were identified.
- Culminated in formal Letters of Agreement with key operational stakeholders.

A small number of operational concerns were raised during the engagement process. These concerns were addressed through clarification, refinement of the proposal, and formalisation of coordination arrangements. No unresolved objections remain.

On this basis, stakeholder engagement is considered complete for the purposes of Stage 4 of the Airspace Change Process.

The outcomes of engagement support submission of the final Airspace Change Proposal for assessment at Stage 5.



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