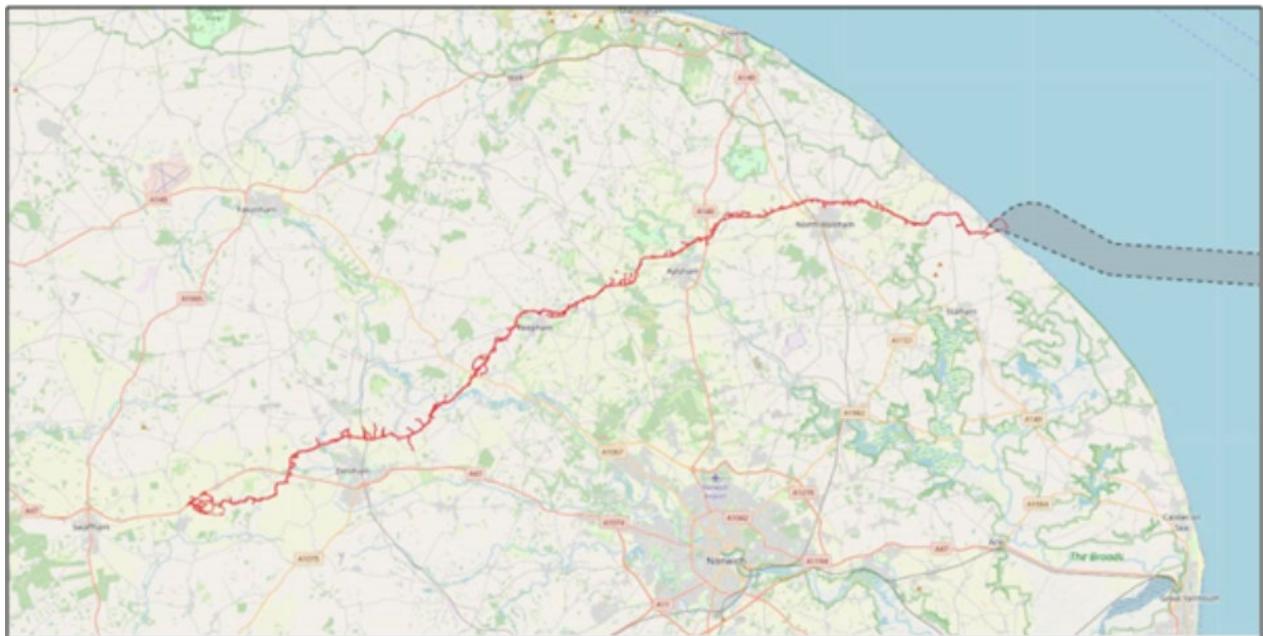


# STIRLINGX



## Appendix C 2

## Consultation Strategy

### **Norwich BVLOS Regulatory Sandbox – Stage 4 (Update and Submit)**

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## Consultation Strategy – StirlingX BVLOS Sandbox

### Introduction

This document outlines the consultation strategy for StirlingX's proposed airspace change under the CAP1616 process. The change involves enabling BVLOS drone operations within unsegregated airspace in Norfolk, using TRA/TMZ structures supported by Norwich ATC. The strategy ensures stakeholders are informed, engaged, and able to provide meaningful feedback on the proposed change, which is part of the Vanguard BVLOS Sandbox trial.

### Objectives

The strategy is underpinned by the following objectives:

- Ensure transparency and inclusivity in the consultation process.
- Identify and engage all stakeholders affected by or interested in the proposed BVLOS operations.
- Provide clear, accessible information about the proposed airspace change.
- Gather informed feedback to shape the final ACP submission.
- Demonstrate compliance with CAP1616 requirements and best practices.

### Summary of Engagement Activity Undertaken to Date

- Meetings with Norwich ATC regarding TRA/TMZ structure and operational support.
- Informal coordination with Felthorpe Airfield flying club.
- 6 monthly meeting with the East Anglian Airspace Users Working Group (EAAUWG) at RAF Marham.
- Informal engagement with local flying clubs and RC Aeroclubs.
- Informal engagement with Air Ambulance.
- Informal engagement with Commercial Offshore Helicopter Operators in Norwich.
- Informal engagement with Corporate Aviation Operators at Norwich Airport.
- Informal engagement with AAC at Wattisham and the RAF at Marham.
- Connectivity study with BT for mobile network coverage.
- Internal stakeholder mapping and risk assessments as part of SORA and ConOps development.

## Audience

Stakeholders likely to be affected or interested include:

- Aviation Stakeholders:
  - NATMAC members
  - Norwich Airport ATC
  - Local flying clubs and GA pilots
  - Corporate Aviation Operators at Norwich Airport
  - UK Civil Aviation Authority (CAA)
  - MOD
  - NATS
- Local and Public Stakeholders:
  - Residents near the cable corridor (Reepham, Cawston, Southgate, Happisburgh)
- Industry and Technical Stakeholders:
  - Redacted (wind farm owner)
  - Redacted (connectivity provider)
  - Redacted
  - UAS manufacturers and technology providers

## Approach

The consultation will use multiple channels to ensure accessibility and engagement. Our approach combines an online consultation portal, targeted email outreach, in-person drop-in sessions at Felthorpe Airfield, and topic-specific webinars. This mix is intentionally chosen to (i) align with CAP1616 expectations for transparent, accessible, and proportionate engagement; (ii) reach the full breadth of affected and interested parties across aviation and industry; and (iii) produce auditable, structured evidence for the ACP submission.

### 1) Alignment to objectives and CAP1616 proportionality

The consultation method directly supports our stated objectives—to be transparent and inclusive; to identify and engage all stakeholders; to provide clear, accessible information; and to gather informed feedback that shapes the final ACP—while demonstrating compliance with CAP1616 process requirements and recommendations on consultation duration and openness.

### 2) Fitness-for-purpose across diverse stakeholder groups

- **Online portal (maps, FAQs, feedback forms):** Gives a single, authoritative source of truth that is always available, presents complex airspace proposals (e.g., TRA/TMZ constructs) clearly with visuals, and captures structured submissions for analysis.
- **Targeted email outreach:** Ensures direct, timely notifications to aviation stakeholders (e.g., NATMAC members, Norwich ATC, GA clubs, corporate operators, MOD, NATS) and industry partners (e.g., **Redacted** tech providers), reducing the chance that critical technical stakeholders miss key information.
- **Felthorpe Airfield drop-in sessions:** Provide a familiar, low-barrier venue for GA pilots and local airfield users to view flight volumes and buffers, ask operational questions, and give feedback face-to-face—vital for users most proximate to proposed activity.
- **Webinars:** Enable geographically dispersed aviation and industry stakeholders (e.g., offshore helicopter operators, corporate and military users) to engage deeply with the ConOps/SORA elements and surveillance/EC/DAA mitigations without travel, increasing participation and reducing operational disruption.

### 3) Operational practicality and safety

Because our proposal is intertwined with Norwich ATC support and the use of TRA/TMZ structures, this approach allows targeted technical briefings (via webinars and pre-operational engagements) while keeping general public engagement accessible and non-disruptive to airport operations. It balances specialist forums for operational users with broad channels for community members.

### 4) Evidence, auditability, and analysis

Using a digital portal and structured feedback forms (supplemented by sign-in and note-taking at physical sessions) creates a complete audit trail and simplifies production of the Consultation Report and Response to Representations. It also streamlines integration of insights into the final ACP submission.

### 5) Proportionality and efficiency

A blended digital/in-person model provides national-scale reach at low cost while ensuring local and GA voices can be heard in-person. It is proportionate to the scale and

novelty of BVLOS operations in unsegregated airspace while remaining practical for an 8-week consultation window.

## 6) Timing and duration

Running the consultation over 8 weeks (mid-September to Mid-November 2025) aligns with CAP1616 recommendations and dovetails with our pre-operational briefings (Sept-Oct 2025) and the overall Pre-Trial engagement phase. This ensures stakeholders have sufficient time to review materials, attend a session or webinar, and submit informed feedback.

- Online portal with maps, FAQs, and feedback forms
- Email to appropriate stakeholders
- Drop-in sessions Felthorpe Airfield
- Webinars for aviation and industry stakeholders

### Materials

Stakeholders will be provided with:

- Consultation Pack with maps, operational descriptions, safety mitigations, and FAQs
- Technical Summaries explaining EC, DAA, and surveillance systems
- Visual Aids including diagrams of flight volumes and buffers

### Length

We will run an 8-week consultation from 15 September to 15 November 2025, with a grace period to end Nov for late representations. 8 weeks is proportionate for a trial ACP under CAP1616, reflects the CAA's request to allow the full engagement window before submission, and builds on our pre-engagement since October 2024. This duration also preserves time to analyse responses and prepare the Consultation Report and Response to Representations ahead of Stage 4 submission on 10 January 2026.

### Post-consultation

#### Consultation Timescale and Rationale

Consultation window: Mid-September 2025 – mid November 2025 (eight weeks), with a short late-representation grace period to end November 2025 for any submissions delayed by stakeholder governance cycles. This implements the eight-week duration already envisaged in the strategy while fixing dates for publication and closure.

## Why eight weeks?

Proportionality under CAP1616 (Trials/Temporary ACPs): CAP1616 places emphasis on proportionate engagement for airspace trials. For a geographically delineated TRA/TMZ trial supporting a BVLOS sandbox, an 8-week window is considered sufficient and proportionate to the scale and potential impact.

**Consistency with CAA feedback:** Following the Assessment Meeting for ACP-2025-025, the CAA requested we allow sufficient time to complete the 8-week engagement before submitting the proposal.

**Built on extensive pre-engagement:** Since October 2024, we have undertaken continuous informal engagement.

**Balance between accessibility and programme delivery:** 8 weeks provides adequate time for aviation organisations with internal review cycles to respond, while preserving schedule for analysis and submission.

## Key Dates and Milestones

Following the consultation:

- Feedback will be analysed and summarised in a Consultation Report
- A Response to Representations document will be published
- Final ACP submission will include consultation evidence
- Stakeholders will be notified of the outcome and next steps

Phase	Activity	Target dates	Rationale
Pre-launch	Publish full consultation pack (portal live, FAQs, maps), issue stakeholder notifications	w/c 8 Sept 2025	Gives ~1 week of pre-reading before the formal start; reduces clarifications during Week 1.
Consultation – Week 1–8	Formal consultation open	15 Sept – 15 Nov 2025	8 weeks aligns with proportionality for trials and CAA

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			expectations for ACP-2025-025 sequencing.
Grace period	Accept late representations	to 30 Nov 2025	Captures inputs delayed by governance sign-offs without materially affecting schedule.
Post-consultation analysis	Code and analyse responses; update FAQs; prepare Consultation Report and Response to Representations	30 Nov – 15 Dec 2025	Reserves two-plus weeks to conscientiously consider responses before finalising the ACP submission.
Stage 4 submission	Final ACP submission to CAA	13 Feb 2026	Leaves clear separation between consultation closure and submission, addressing CAA feedback.