

CAA Targeted Engagement Assessment – Temporary and Trial Airspace Changes

CAP 1616g

Title of airspace change proposal	North Norfolk TRA (+TMZ) for BVLOS Onshore Cable Corridor Survey
Change sponsor	Stirling X Ltd
Project reference	ACP-2025-025
Case study commencement date	10/03/26
Case study report as at	14/04/26
<p><i>Instructions</i></p> <p>In providing a response for each question, please ensure that the ‘status’ column is completed using the following options:</p> <ul style="list-style-type: none"> • YES • NO • PARTIALLY • N/A <p>To aid the SARG Lead it may be useful that each question is also highlighted accordingly to illustrate what is:</p> <p>resolved YES not resolved PARTIALLY not compliant ... NO ...</p>	

Targeted Engagement Assessment	
1	<p>Has the change sponsor identified the right audience(s) and provided a rationale for selecting them?</p> <p style="text-align: right;">YES</p> <p>The sponsor identified a broad range of aviation and relevant non-aviation stakeholders with a direct operational or contextual interest in the affected airspace. Initial engagement focused on aviation stakeholders and representative forums. Stakeholders were identified through a structured mapping exercise and categorised according to their relationship with, or use of, the affected airspace, as well as the potential impact of the proposed TRA/TMZ activation. This included air navigation service providers, representative forums (such as NATMAC and the East of England Airspace Users Working Group (EEAUWG)), general aviation organisations, military units, emergency services, and relevant industry and technical stakeholders. However, based on the initial information received, clarification was required to address a few gaps in the submission. Specifically, these related to:</p> <ul style="list-style-type: none"> • The total number of unique stakeholders engaged, due to duplication within the stakeholder list • The identification of individual organisations engaged through the EEAUWG

	<ul style="list-style-type: none"> The representation and evidence of engagement with residents and public stakeholders <p>In response, the sponsor provided a comprehensive stakeholder list confirming engagement with 60 distinct organisations. It was clarified that stakeholders represented through both NATMAC and EEAUWG were included within this total. The sponsor also explained that engagement with EEAUWG members was conducted via a central representative acting as a conduit for dissemination, and that duplication arising from multiple points of contact had been removed. The updated information demonstrates engagement across a comprehensive range of stakeholder groups within NATMAC and EEAUWG, including:</p> <ul style="list-style-type: none"> National and strategic bodies: NATS, ACOG, DAATM, MAA, Navy Command HQ, United States Visiting Forces (USVF – UK) Airlines and commercial aviation: Airlines UK, British Airways, easyJet. Pilot and operator associations: Aircraft Owners and Pilots Association (AOPA), British Airline Pilots Association (BALPA), Honourable Company of Air Pilots (HCAP), Light Aircraft Association (LAA), PPL/IR Europe, General Aviation Alliance (GAA), UK Flight Safety Committee (UKFSC) GA and recreational users: British Gliding Association (BGA), British Hang Gliding & Paragliding Association (BHPA), British Microlight Aircraft Association (BMAA), British Skydiving, British Balloon & Airship Club, HCGB, BHA, British Model Flying Association RPAS/UAS stakeholders: ARPAS-UK, Drone Major Group. Environmental and safety bodies: Aviation Environment Federation (AEF), UK Airprox Board, Airports and aerodromes: Norwich International Airport, Cambridge Airport, Duxford Aerodrome, Old Buckenham Airfield, Felthorpe Aerodrome, Wattisham Airfield, Ludham Airfield. Military units and air traffic services: Swanwick Military (78 Sqn), RAF Waddington, RAF Marham Emergency services: East Anglia Air Ambulance, Norfolk Police (Drone Unit) Gliding and paragliding clubs: Norfolk Gliding Club (Tibenham), Welland Gliding Club, Norfolk Hang Gliding & Paragliding Club, Get your wings Commercial helicopter operators: Bond Helicopters, Babcock International, Bristow Helicopters, CHC Helicopters, Saxon Air Infrastructure and landowner stakeholders: RWE Group, Siemens Energy, Murphy Group BVLOS trial stakeholders: Global Drone Training, PilotAware <p>The sponsor also clarified that engagement with residents and landowners has been undertaken since 2021 in relation to drone operations, managed through an Agricultural Liaison Officer, and primarily operational in nature. Based on the additional information provided, the earlier limitations in transparency have been sufficiently addressed. The evidence now demonstrates that the sponsor has identified the appropriate stakeholder audiences and applied a clear and proportionate rationale for their selection, consistent with CAP1616g for this type of ACP.</p>	
2	<p>Has the change sponsor clearly detailed the period of engagement? Was the period of engagement sufficient to facilitate effective engagement?</p> <p>The submission initially stated that engagement took place over an eight-week period ending on 15 November 2025. However, there was inconsistency in the reported start date: the Consultation Pack cited 13 September 2025, while the Strategy stated 15 September 2025. A clarification question was therefore sent to sponsor who confirmed that formal launch emails were issued to stakeholders on the 13 and 14 October 2025. Engagement activity then continued until 30th of November 2025, a total period of 7 weeks.</p>	<p style="text-align: center;">YES</p>

	<p>The sponsor explains that this period was considered proportionate for a temporary/trial ACP under CAP1616, given the geographically limited TRA and TMZ supporting a BVLOS sandbox. They also noted that the duration provided enough time for stakeholders to review the material and respond, particularly as it followed pre-engagement activity undertaken since October 2024. CAP1616g identifies six weeks as a reasonable starting point for an engagement period, and the duration applied in this case is therefore consistent with that guidance.</p>	
3	<p>Has the change sponsor explained the engagement methodology / approach used?</p> <p>The change sponsor describes engagement as being undertaken through direct interaction with operational stakeholders and structured regional working groups, with dialogue reportedly ongoing since 2021. The proposed design evolved through iterative input as part of a multi-year programme conducted via the EEAUWG, supported by meeting minutes dating from 2023.</p> <p>The methodology combined informal pre-engagement and formal engagement activity. Pre-engagement began in October 2024, followed by a seven-week formal engagement period from 13 October to 30 November 2025. Direct correspondence and bilateral discussions were used to address specific operational concerns.</p> <p>Materials were distributed via direct email and representative forums, including NATMAC and the EEAUWG, outlining feedback mechanisms and points of contact. The sponsor stated that a mix of digital and in-person channels were used including:</p> <ul style="list-style-type: none"> • An online portal hosting materials and providing a feedback mechanism. A QR code linking to the StirlingX website enabled feedback submission. • Targeted emails issued from a dedicated address to relevant stakeholders • Drop-in sessions for GA pilots and local users to review proposals and ask questions • Webinars enabling geographically dispersed stakeholders to engage remotely <p>No general reminder emails were issued during the period. While invitations to specific sessions were circulated, these did not act as formal prompts for feedback.</p> <p>Public drop-in sessions in affected villages were referenced but not initially evidenced. Following clarification, the sponsor confirmed that only one stakeholder responded (indicating they could not attend) and that no attendees participated, either in person or online.</p>	YES
4	<p>What engagement materials have been used by the change sponsor during the targeted engagement?</p> <p>Stakeholders were contacted via an engagement email which provided a brief overview of the ACP and the purpose of the engagement. The email directed stakeholders to further information through a link to the Norfolk Offshore Wind Zone (NOWZ) project information page, which contained additional details about the proposal and interactive maps of the proposed airspace. This page acted as the central source of information and included a feedback form enabling stakeholders to submit responses directly.</p> <p>A 19-page 'Consultation Pack' was distributed as a PDF attachment to the engagement email. This document contained explanatory and technical information, including maps, operational descriptions, safety mitigations, and frequently asked questions. It also included technical summaries and visual aids, such as diagrams illustrating the proposed flight volumes and buffers. A separate 5-page document titled "Airspace Design Supporting Material", which summarised the proposed design, was also included in the submission. In addition, a presentation titled "Vanguard BVLOS Project", outlining the project overview and timeline, was also provided as supporting material.</p>	YES

<p>5</p>	<p>Has the change sponsor produced engagement materials that provided respondents with enough information to ensure that they understood the issues and the potential impacts of the airspace change proposal on them, and could give informed responses?</p>	<p>YES</p>
<p>The engagement email provided stakeholders with an overview of the ACP and key operational details. This included the proposed TRA/TMZ ceiling of 750 feet AMSL on the Norwich QNH (equating to approximately 500–600 feet AGL for most of the route), and a flight volume ceiling of 400 feet AGL. It also explained that the TRA would be divided into three sections to enable flexible activation by NOTAM, supported by images and a link to an online map. This gave stakeholders an appropriate level of operational context.</p> <p>However, the email did not clearly define the engagement period. It stated that “this consultation will remain live until the end of November,” which provided only a general indication of timing and may have limited clarity on the deadline for submitting feedback.</p> <p>The Consultation Pack included explanatory and technical information such as maps, operational descriptions, safety mitigations, and FAQs. It also provided summaries of Electronic Conspicuity (EC), Detect and Avoid (DAA), and surveillance systems, supported by visual diagrams of flight volumes and buffers. Similar content, including interactive maps, was available on the StirlingX website.</p> <p>Overall, the materials were primarily geared towards aviation stakeholders. While they offered an appropriate level of technical detail for this audience, they may be considered complex for non-technical stakeholders and were supported by only a limited glossary. Aside from FAQs aimed at residents and landowners, no tailored materials were provided for a broader audience. Given that CAP1616g prioritises engagement with aviation stakeholders, this approach is considered acceptable.</p>		
<p>6</p>	<p>Has the change sponsor provided evidence of engagement records to demonstrate that all reasonable actions have been taken to ensure stakeholders were informed of the engagement activity and were offered the opportunity to engage with it?</p>	<p>PARTIALLY</p>
<p>The sponsor has provided evidence demonstrating that stakeholders were informed of the engagement activity and offered the opportunity to participate. This includes formal launch communications issued at the start of the period (e.g. emails to EEAUWG and NATMAC), as well as targeted correspondence to specific stakeholders such as the Norfolk Hang Gliding and Paragliding Club and DAATM.</p> <p>Supporting evidence of engagement activity has also been provided, including:</p> <ul style="list-style-type: none"> • Letters of Agreement (LoAs) with key operational stakeholders (e.g. RAF Marham, Norwich ATC, and emergency services) • Records of ongoing interaction through EEAUWG, including meeting invitations, minutes, and presentation materials from 2023 to 2024 • Letters of support from stakeholders dated 2023 • Technical documentation, including airspace design material and records of a tabletop exercise with Norwich ATC <p>These records indicate that multiple channels were used to notify stakeholders and facilitate engagement. However, there is limited evidence of stakeholder responses and two-way interaction, including raw feedback (e.g. completed forms, correspondence, or recorded comments) across several groups such as GA, emergency services, military stakeholders, and Norwich ATC. In addition, no evidence of follow-up or reminder communications has been provided.</p> <p>On balance, while the sponsor has demonstrated that stakeholders were informed and given the opportunity to engage, the absence of clear evidence of active follow-up and captured responses reduces assurance that all reasonable actions were taken to fully support and evidence stakeholder participation.</p>		

7	<p>Has the change sponsor demonstrated how they actively monitored responses during the engagement activity and what reasonable steps they took to elicit a response from stakeholders?</p>	<p>PARTIALLY</p>
	<p>The sponsor did not initially provide evidence demonstrating how responses were actively monitored during the formal engagement period, nor what steps were taken to elicit responses from stakeholders. As a result, a clarification request was raised. In response, the sponsor confirmed that no formal reminder communications or follow-up notifications were issued during the seven-week engagement period. Instead, the engagement was positioned within a broader programme of ongoing interaction with aviation stakeholders, with BVLOS sandbox proposals and operational updates presented at multiple meetings since January 2023. This activity was supported by meeting minutes and presentation materials. While this demonstrates a wider pattern of engagement over time, it does not fully address the requirement to evidence active monitoring of responses or proactive steps taken to encourage participation within the defined engagement window itself. This is further reflected in the low response rate of seven stakeholders out of 60 engaged, which suggests limited active encouragement of stakeholder input during the formal engagement period.</p>	
8	<p>Has the change sponsor provided relevant evidence of its engagement activity and how the feedback received has been taken into account?</p>	<p>PARTIALLY</p>
	<p>The sponsor confirms that the document titled <i>“Vanguard TRA Sandbox Consultation Feedback”</i> represents the full set of written responses received through the formal engagement period. This includes four responses to the question on operational impact: Norwich Airport ATC (noting no operational impact), a general aviation respondent (noting very little impact), Felthorpe Flying Club/general aviation representatives (noting little to no effect due to liaison with Norwich ATC), and one additional aviation stakeholder indicating minimal operational impact. The submission also includes limited additional correspondence from NATS, DAATM, and GetYourWings. In the case of GetYourWings, the sponsor clarifies that engagement took place via an informal in-person meeting during which no objections were raised, rather than through a formal written response.</p> <p>Therefore, of the 60 stakeholders engaged, only seven responses were received through the formal engagement channels, representing a low response rate. The sponsor also notes that two NATMAC town hall sessions were offered, with invitations issued; however, no stakeholders attended and only one stakeholder responded to indicate they were unable to participate. The sponsor considers the limited number of formal responses to reflect the non-disruptive nature of the proposal and the benefit of extensive prior engagement, including multiple opportunities for feedback through established aviation forums such as the EEAUWG.</p> <p>According to the Engagement Report, a small number of localised operational concerns were raised during the engagement period, primarily relating to gliding, hang gliding, and paragliding activity in proximity to the proposed corridor. These concerns were addressed through targeted engagement, resulting in refinements to the proposal, including clarification of altitude limits, introduction of local buffers, and definition of activation arrangements. The sponsor states that stakeholders subsequently confirmed their concerns had been satisfactorily resolved, with no remaining objections to the principle of the proposed TRA/TMZ or BVLOS sandbox activity. Supporting evidence of engagement with the NHGPC, including email correspondence and meeting minutes, has been included within the submission.</p>	

	<p>The sponsor further states that Stage 3 engagement identified additional operational considerations relating to awareness and notification of airspace activation, interaction with specialist aviation activity, and coordination arrangements for emergency services and military aircraft. These inputs informed refinements to the proposal, including clarification of activation, notification and deactivation procedures; confirmation of priority access and suspension arrangements for emergency and military operations; refinement of local buffers and operating practices; and formalisation of coordination arrangements through Letters of Agreement (LoAs) with key stakeholders.</p> <p>In support of this, the sponsor has provided evidence of formal coordination through LoAs, including signed agreements with NPAS and RAF Marham. For RAF Marham, an accompanying email trail demonstrating the development and agreement of the LoA has been included. Evidence of coordination with Norwich ATC comprises a signed LoA supported by minutes from a tabletop exercise dated 27/01/26. An email relating to the signing of the Babcock LoA has also been provided. In addition, email confirmation from NPCC stating that a LoA is not required, as the proposed TRA/TMZ is not expected to affect their operations, is included.</p> <p>While the Engagement Report demonstrates that stakeholder input has informed refinements to operational procedures and coordination arrangements, the supporting evidence does not completely provide a complete record of how feedback was captured and reflected in design development. In particular, there is limited documentation of detailed feedback exchanges between the sponsor and some stakeholders, which reduces visibility of how individual responses influenced specific iterations of the proposal.</p> <p>Notwithstanding these limitations, the evidence provided, particularly the refinements to operational procedures and the formalisation of arrangements through LoAs, demonstrates that stakeholder input has been considered and has informed the final design. The LoAs in particular, provide assurance of agreed positions with key operational stakeholders and support closure of engagement for those parties.</p> <p>Overall, the engagement indicates that feedback has been taken into account and has influenced specific aspects of the proposal, particularly in relation to activation procedures, coordination, and access priorities, with no unresolved objections recorded. While there are some limitations in the supporting evidence and how feedback is evidenced as being taken through the process, the overall approach remains proportionate to the nature of the proposal and demonstrates meaningful incorporation of stakeholder feedback.</p>	
9	<p>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? If the impacts of the final design option have substantially changed, has the change sponsor considered whether additional engagement is required?</p>	<p style="text-align: center;">YES</p>
	<p>The sponsor has ensured that the final ACP reflects the design elements that were engaged on. All refinements following Stage 3 engagement such as TRA/TMZ activation and deactivation procedures, priority access and suspension procedures for emergency and state aircraft, and adjustments to local operating practices and buffers were procedural or clarificatory and did not materially change the scope or intent of the proposal. No new or unengaged design elements have been introduced.</p>	
10	<p>Has the change sponsor included in their final airspace proposal how they intend to inform any communities affected by noise impacts?</p>	<p style="text-align: center;">NO</p>

	The sponsor is not required to provide any noise data therefore it is not possible to identify and inform any communities based on noise impacts. Nonetheless see Qs 12 for conditions on this.		
11	Taking the above considerations into account, does the SME recommend that this proposal has met the engagement requirements of the Temporary Airspace Change process?		YES
	I am satisfied that the change sponsor has conducted this engagement in accordance with the requirements of CAP1616g. Stakeholders were informed and given the opportunity to participate through multiple channels, including direct communications, representative forums, and supporting materials. While compliant with CAP1616g, limitations are noted in the supporting evidence, including limited documented two-way interaction, no formal reminder or follow-up communications, and a low response rate relative to the number of stakeholders engaged. Nonetheless, stakeholder input has been reflected in refinements to operational procedures, coordination arrangements, and activation processes, with Letters of Agreement evidencing agreed outcomes with key stakeholders. Overall, the engagement is considered proportionate to the Trial Airspace Change and meets the requirements of CAP1616g.		
12	Are there any Condition(s) which the change sponsor must fulfil (if approved)? If yes, please list them.		YES
	<p>Before activation:</p> <ul style="list-style-type: none"> CAA must be satisfied that all stakeholders have been informed of the modification to a TDA. The change sponsor must share all finalised and signed copies of all the LOA's before approval of activations of the TDA. The change sponsor should inform the stakeholders of the decision (when published), including the amendments that are being proposed, its likely impacts and what will happen next. <p>During activation:</p> <ul style="list-style-type: none"> The sponsor is required to collate, monitor, and report to the CAA on the level and contents of feedback received during the period of the trial. The CAA expect reporting on the level and contents of any stakeholder feedback received when requested within 14 days of a request throughout the duration of the trial (this should include nil returns). The sponsor should send these reports to the assigned Account Manager 		
Targeted Engagement Assessment sign-off			
	Name	Signature	Date
Assessment completed by Airspace Regulator (Engagement and Consultation) / Airspace Specialist (Engagement and Consultation)	[REDACTED]	[REDACTED]	15/04/26

Assessment reviewed by Airspace Specialist (Engagement and Consultation)	[REDACTED]	[REDACTED]	14/04/26
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