

Appendix C

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When to undertake this activity		
Stage 1: Define	1A: Assess requirement	✓
	1B: Design principles	✓
Define gateway		
Stage 2: Develop and assess	2A: Options development	✓
	2B: Options appraisal	~
Develop and Assess gateway		
Stage 3: Consult	3A: Consultation preparation	✓
	3B: Consultation approval	✓
Consult gateway		
	3C: Commence consultation	✓
	3D: Collate and review responses	✓
Stage 4: Update and submit	4A: Update design	~
	4B: Submit proposal to CAA	~
Stage 5: Decide	5A: CAA assessment	✗
	5B: CAA decision	✗
Decide gateway		
Stage 6: Implement		✓
Stage 7: Post-implementation review		✓

What does this activity entail?

Consultation is a formal process seeking input into a decision, undertaken in line with the Gunning principles and government guidance.

Engagement is a catch-all term for developing relationships with stakeholders, covering a variety of activities including but not limited to consultation, information provision, regular and one-off meetings and forums, workshops and town hall discussions.

Communication with all affected stakeholders throughout the formal airspace change process.

Formal consultation activities at key points during the process, including around developing design principles, and undertaking consultation and post-implementation review.

Best practice ongoing engagement to ensure that airspace change proposals are received by an informed, engaged audience able to effectively feed-in their views.

Using the CAA's airspace change portal effectively as a communication tool.

The CAA's own stakeholder engagement, undertaken during the stages of the process that it leads.

Ensuring all materials are clear and accessible.

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PPR proposals

References in this appendix to the airspace change process, airspace change proposals and changes in airspace design can also be read as referring to the PPR process and PPR proposals by an air navigation service provider, except for the following:

- paragraphs C24 to C27 and C52 to C54
- all references to design principles and the 'Define' and 'Develop and Assess' gateways
- 'Consult' gateway is renamed 'Assess and Consult' gateway
- the air navigation service provider carries out the post-implementation review referred to in paragraphs C59 and C65.

Why is this activity included in the process?

C1. All parties involved in airspace changes require transparency and tailored engagement to

meet their unique needs. As such, effective stakeholder engagement is a vital underpinning of the airspace change process.

- C2. For consultation to be effective, those who are consulted by change sponsors should be able to base their views on a reasonable understanding of the situation, clear information about what is proposed and the potential impact of the changes on them, and be able to express their views and have confidence that their views will inform the final proposal. This is why engagement should not begin only at the start of the process, but should be built on existing relationships.
- C3. There are three clear points in the process where change sponsors will be explicitly seeking stakeholder input to their proposals, but for that input to be informed and meaningful, engagement will be required throughout the process by sponsors.
- C4. This guidance is not restrictive: there is nothing to stop a change sponsor from going beyond both the requirements and best practice set out here if it feels that the local circumstances require it.
- C5. The CAA will seek input on the most impactful changes while making its decision, and will undertake engagement activity for some airspace changes at key decision-making points. For Level 1 airspace changes the CAA may offer a Public Evidence Session and will normally publish a draft decision for feedback.

Key terms to check in our glossary

Airline customers	Bilateral meeting	Consultation
Elected representatives	Engagement	Facilitation
Feedback	Focus group	Gunning principles
Information provision	Local authorities	Non-governmental organisation
Planned and permanent redistribution of air traffic (PPR)	Portal	Representative group
Stakeholder		

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How to undertake this activity

- C6.** In particular for the largest, most impactful and most complex airspace changes, engagement activity will be most effective if stakeholders already have a reasonable understanding of how airports, airlines, air navigation service providers and related airspace operate. While direct stakeholder engagement should be greatest during the stages of a formal airspace change, ongoing engagement and information can help stakeholders understand the context for proposed changes and provide constructive feedback and comments.
- C7.** The CAA does not intend to set out how engagement must be undertaken in a prescriptive way. For the most important aspect of stakeholder engagement, the consultation undertaken in Stage 3, change sponsors must submit their consultation strategy and associated documentation to the CAA for review. This will give the CAA the opportunity to consider the change sponsor's approach to its unique local circumstances and determine whether it meets regulatory requirements prior to the consultation beginning.
- C8.** As a change sponsor starts to consider the need for an airspace change, beginning to understand how it will potentially impact stakeholders, whether these are other airspace users; impacted communities; representative groups and non-governmental organisations is important. A change sponsor must also consider other industry bodies – such as airports using neighbouring airspace or air navigation service providers – that might experience consequential impacts as a result of its proposed change.
- C9.** The core principle underpinning the CAA's assessment of whether a change sponsor is engaging stakeholders effectively will be evidence that the change sponsor is

engaging in a two-way conversation. The nature of a two-way conversation and how it is evidenced will differ depending on the circumstances, the type of meeting, the relationship between the stakeholder and change sponsor, and the details of the proposal. However, at relevant gateways the CAA will look for documentary evidence that change sponsors have used the following building blocks to develop an effective dialogue:

Identifying the right audience

- Who might be impacted? Are they impacted directly or indirectly? How has the audience been identified?

Understanding their situation

- What is the nature of the relationship? What is the relationship history? What is their level of knowledge? Which elements of the proposal will impact them?

Defining their unique requirements

- How will they be engaged? Do they have any different or special requirements? Are there any seldom heard groups impacted? How will material be targeted for different groups and situations identified?

- C10.** Following this process, the CAA will expect to see evidence of what the change sponsor has heard and how this feedback has informed the development of its proposal. How the change sponsor develops this reporting will depend on the change, the engagement approach and the audiences engaged, but could consist of meeting minutes; engagement records; analysis of survey or informal consultation outcomes; a 'We asked, you said, we did' analysis; or some other mechanism considered appropriate.

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Providing relevant, authoritative, clear information at the appropriate time

- C11.** Based on these building blocks, the CAA will expect to see detail of what change sponsors have been told by their audiences; how they responded to this feedback; and how it has affected the proposals they are bringing forward.
- C12.** Earlier in the process, as there will not be clarity on the precise impacts of a proposed change, it will be more challenging to identify potential audiences with whom to engage on this process. It is therefore likely that contact will primarily be with stakeholders' representatives: community leaders; local authorities elected representatives; airport consultative committees; representative groups; governmental organisations; and industry groups. These will likely be a more informed audience, and will often be people with whom the proposer has an ongoing relationship, helping to contextualise the engagement and developing proposal.
- C13.** Bilateral meetings, participatory sessions and consultative workshops are likely to be the most effective method of seeking meaningful contributions from stakeholders during Stages 1 and 2. Focussed opinion surveys of small numbers of stakeholders may be used to provide some quantitative data on which to base design principles and options appraisals.
- C14.** Developing the options appraisal documentation allows the change sponsor to move from more generic engagement, designed to reach larger audiences, to more precise identification of the audience. The change sponsor must remain mindful that each stakeholder is likely to have different needs, and the sponsor should reach different audiences in a way which suits those audiences.
- C15.** Throughout the process, the change sponsor owns the requirement for stakeholder engagement. The CAA will publish documents or updates, and may communicate this to stakeholders, but the onus is on the change sponsor to ensure that all parties are kept updated and informed during the process.
- C16.** The CAA's intention is that the airspace change process is undertaken publicly. Documents will be published on the airspace change **online portal**, with the sole exception being the points in the process where the CAA will review a document prior to publication (set out below). These documents must be made available in a manner that is clear and accessible to all stakeholders. Although the concepts communicated in them may be complex, the language used to communicate them should not be.
- C17.** However, some material is not published:
- material that is confidential in the interests of national security
 - material which the CAA has agreed with the change sponsor should not be made public, in order to protect the legitimate commercial interests of a person or business (in the same way that we are obliged to apply the Freedom of Information Act to any information held by the CAA).⁷⁵
- C18.** If the proposal contains any such sensitive information, then two versions must be submitted – one full version for the CAA and one redacted version for publication. More information on this appears in **Appendix F**. The default position is that all material in relation to a proposal is published. We do not anticipate routinely agreeing to withhold large amounts of information, and would only accept redaction of the minimum information necessary to comply with our obligations.

75. For more information on the CAA's obligations please see <https://www.caa.co.uk/Our-work/Information-requests/Freedom-of-Information/>

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C19. The change sponsor must maintain clear records of engagement activity with all stakeholders throughout the process, to help inform future interactions with stakeholders and to develop the consultation strategy. These records will help the CAA judge the validity of engagement activity at relevant gateways.

C20. One mechanism to show how engagement activity has been undertaken and influenced the development of proposals is to adopt a model similar to the Statement of Community Involvement adopted by local authorities. These explain to the public how they will be involved with the development of local plans, and set out the authority's engagement plans and minimum standards.⁷⁶ They can then be updated or cross-checked to show how the engagement activity was undertaken in practice, and how it has influenced the proposal's development. Change sponsors may consider such an approach.

C21. Expected engagement activity, evidence and publications are detailed for each Stage and Step of the process in the following pages:

Stage 1: DEFINE

Step 1A: Assess requirement (published outputs: Statement of Need; assessment meeting minutes, proposed timescales)

Step 1B: Design principles (published outputs: airspace change proposal design principles, explanation of how these were influenced through engagement)

C22. Initial contact with stakeholders is likely to be crucial in all change proposals, as transparently communicating what need is being met through the considered change will set the tone for ongoing engagement and will also help change sponsors to develop the materials required in subsequent stages.

DEFINE gateway

At the 'Define' gateway, for all changes the CAA will require evidence from the change sponsor that demonstrates that design principles were arrived at following two-way conversations. This must set out what engagement activity was undertaken (i), and what has happened as a result of that activity (ii).

- (i) This will normally include records and minutes of workshops and meetings, with identification of those present and the context and nature of the discussion, and it must cover the range of stakeholders who may be impacted by the potential change. As stakeholders will often require information to aid their understanding of airspace design so as to play a part in development, evidence of how sponsors achieved this should be provided.
- (ii) Change sponsors must make clear where stakeholders have agreed the principles applied (and which have not if universal agreement is not achieved). Where design principles have not been agreed, objections must be clearly set out and attributed to relevant parties, as well as a clear rationale for the change sponsor's decision in light of this feedback.

⁷⁶ Many local authorities publish their Statements of Community Involvement, so best-practice examples are readily available online.

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C23. The CAA recommends, particularly for complex or higher impact proposals, that the change sponsor considers developing an engagement strategy to set out its intended approach to stakeholder engagement throughout the duration of the airspace change process.

C24. Design principles must be shown to have been set through a two-way process and involve effective engagement. Engagement here is important to both parties – for the change sponsor to clearly communicate the need for change and their priorities, and for those affected (particularly impacted communities) to have the opportunity to explain what design considerations are important to them as the change sponsor considers possibilities to meet their needs.

C25. The CAA understands that it may not always be possible to achieve agreement across all stakeholders on design principles. Change sponsors must set out clearly the competing priorities and explain their choice of options based on this.

C26. This is one stage of the process where neutral facilitation may be helpful. Facilitation is not a requirement, as it may not be appropriate in all circumstances, but where agreement on principles is not reached and facilitation has not been tried, the CAA may in some cases decide not to accept the sponsor's design principles.

Stage 2: DEVELOP and ASSESS

Step 2A: Option development (published outputs: design options, design principle evaluation, evidence of feedback from stakeholders and an explanation of how it influenced the options)

Step 2B: Options appraisal (published outputs: Initial options appraisal and related CAA assessment)

C27. As the change sponsor is required to design options that meet the principles developed during Stage 1b, they must seek feedback from key stakeholders to test their hypotheses. Bilateral meetings and smaller challenge groups are likely to be sufficient to ensure that stakeholder concerns have been properly understood and accounted for in designing options.

C28. In judging the efficacy of engagement, the CAA will not look for discussion on the pluses and minuses of each option – that should come during consultation – but will seek evidence stakeholders are content that their views have been captured and taken into account by the change sponsor. The size and nature of meetings should dictate whether formal record keeping and minutes are necessary (in any situation such notes may be helpful for sponsors and stakeholders), but at a minimum sponsors must set out how decisions they have taken relate to stakeholder feedback.

C29. Within the development of the options appraisal during Step 2B, the key impacted audiences will be far more clearly identified. This insight should be used to inform the development of the consultation strategy in Stage 3.

DEVELOP and ASSESS gateway

At the 'Develop and assess' gateway, the Initial options appraisal must set out impacted audiences, as this information will be a key feature in developing the consultation strategy required during Step 3A and at the 'Consult' gateway.

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Stage 3: CONSULT

Step 3A: Consultation preparation (outputs: draft consultation strategy submitted to CAA; draft consultation documents submitted to CAA, including any forms used to capture stakeholder responses not made through the portal; draft Full options appraisal – none published at this stage prior to CAA approval)

C30. Stage 3 is the key stage of the process for the change sponsor in terms of engagement activity – at this stage, understanding of audiences, channels and messages must be such that an effective and comprehensive consultation strategy can be developed and submitted to the CAA.

C31. This consultation guidance was developed with consideration of the **Government's consultation principles**, applied to the unique circumstances surrounding an airspace change proposal. The Government's short guidance document may be helpful for a change sponsor to consider alongside this one. In addition, the change sponsor should be aware of the Gunning principles⁷⁷ when developing its consultation strategy:

- consultation should occur when proposals are at a formative stage
- the consultation should give sufficient reasons for any proposal to permit intelligent consideration
- the consultation should allow adequate time for consideration and response
- the product of consultation must be conscientiously taken into account.

C32. The fundamental principles of effective consultation are targeting the right audience, communicating in a way that suits them, and giving them the tools to make informative, valuable contributions to the proposal's development. The change sponsor's consultation strategy will be judged as to whether it meets these aims. Table C1 **overleaf** sets out what types of information the CAA will review when considering whether to approve the strategy.

77. The Gunning principles set out legal expectations for what constitutes an appropriate consultation, and are named for a court case in the 1980s involving the London Borough of Brent.

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Table C1: Best practice consultation principles

<p>Audience</p>	<p>Audiences to work with in developing design principles will have been identified at Stage 1; further granularity and detail on impacted communities should be identified in the Initial options appraisal during Step 2b.</p> <p>These should be developed and detailed here. Particular consideration should be given to seldom-heard groups; those who are not regularly in contact with the change sponsor; and those who do not have existing knowledge of aviation.</p> <p>The change sponsor must also consider whether it is appropriate to use intermediaries to communicate with impacted stakeholders (for instance airport consultative committees, local authorities, and/or local and national organisations) or whether the nature of the change means direct contact with impacted parties is more appropriate.</p>
<p>Approach</p>	<p>The change sponsor must consult stakeholders in a way that suits them – the formal consultation will be undertaken through the portal, and all information must be available there. However, this will not suit all consultees, so based on the audiences detailed above, the change sponsor must set out how it intends to ensure all audiences are able to respond effectively.</p> <p>Engagement exercises with large numbers of people are challenging to manage in practice, and the consultation strategy must set out how the change sponsor intends to respond to unexpected events and challenges, including escalation and extension plans where appropriate.</p>
<p>Materials</p>	<p>As a matter of course, materials should be short and simple. Respondents should not be expected to understand operational technicalities, still less detailed aviation terminology and practice. While some more complex and detailed materials may be necessary to support feedback from technical audiences, these must only support information that is accessible to an everyday audience. Materials must provide respondents with enough information to ensure that they understand the issues and the potential impact of the proposals on them, and can give informed responses – failure here will lead to an ineffective consultation, which will be of little use to the change sponsor and will be unacceptable to the CAA. The change sponsor may consider guidance published by the Plain English Campaign and the Consultation Institute useful.</p>
<p>Length</p>	<p>The accepted standard is that consultations should last for 12 weeks. Any major holidays should also be considered, allowing extra time where appropriate. However, the 12-week period is not set in stone. The CAA is prepared to exercise some flexibility and will consider a shorter period where the change sponsor presents a case based on:</p> <ul style="list-style-type: none"> • The impact of the change • The audience map and impacted groups (especially seldom-heard people) • Factors outside the change sponsor's control, such as legal constraints • Technical or operational constraints.

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Step 3B: Consultation approval (published outputs: CAA statement on approval of consultation strategy; and, subject to the outcome, publication of consultation strategy, Full options appraisal and related CAA assessment)

C33. The change sponsor may decide whether to publish the consultation strategy prior to commencing consultation or publish it

alongside the other consultation material. In either case, publication is likely to be the first point that the full potential audience of impacted stakeholders is made clear, and the change sponsor should prepare for this to be the first time many people are aware that they may be impacted by proposals.

CONSULT gateway

Passing the 'Consult' gateway will require CAA acceptance of the change sponsor's consultation strategy, associated consultation documents and material, and signifies that the full suite of consultation materials are now ready to be made available, as set out above.

Step 3C: Commence consultation (published outputs: all consultation documents, including Full options appraisal, queries on the proposal and related responses, consultation responses)

C34. At this stage the consultation will begin, and engagement activity will be undertaken in line with the consultation strategy developed in Step 3A. During the consultation, deviations from the consultation strategy should be minimal, and only in line with previously approved escalation and extension plans which are detailed in the consultation strategy to deal with unforeseen issues.

During the consultation

C35. The consultation period is another point in the process where change sponsors should consider whether any public events they run would be enhanced by using a neutral third-party facilitator. In the case of seldom-heard audiences, or for those not currently engaged with the aviation industry, facilitation may be especially useful in achieving effective outputs from consultation events.

Record-keeping

C36. It is expected that the majority of responses to consultations will come via the portal. We will publish the responses at intervals that best manage the resources required for moderation (for example, if a consultation runs for three months, and we deem it best to publish the batches monthly, responses would be published in three separate batches). However, there are several scenarios where additional material may be gathered and must be published on the portal by the change sponsor. In the first place, some respondents may not be able to respond via the portal and may wish to respond with a hard copy. In this situation, the change sponsor must add the response to the portal so that it can be moderated (by the CAA), published and analysed with the other responses. In addition, if the change sponsor runs public events during the consultation, feedback may be gathered formally or informally. The change sponsor may capture and publish this feedback either by way of minutes, a meeting report, or placing feedback materials such as comment cards on to the portal.

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FAQs

C37. As the consultation is undertaken, it may be that a variety of different stakeholders request the same information that was not foreseen when the consultation strategy was developed. Ideally, the consultation development steps should minimise this, but where there are common questions and requests, the change sponsor should develop 'frequently asked questions' (FAQ) material for publication on the online portal. Subject to CAA moderation of responses, we may allow the change sponsor to see the responses before publication (normally 24 hours in advance), to allow the change sponsor to prepare FAQ material if needed.

Step 3D: Collate & review responses (published outputs: sponsor's categorisation of responses)

C38. Categorisation of consultation results is a methodological and careful process that must be undertaken rigorously, and its complexity and importance should not be underestimated. The change sponsor must show how it has heard and understood the feedback it has received; what impact this has had on the proposal it submits; and if the feedback has not influenced its final proposal, why not.

C39. At a high level, the change sponsor should adopt a 'We asked, you said, we did' approach to setting out its qualitative assessment of consultation responses.

C40. Quantitatively, the change sponsor must be able to show which elements of a response may have an impact on its final proposal and which could not. If a consultation response does not impact on a final proposal, the sponsor must be able to show that it has heard and understood the feedback, and explain why it will not affect its final proposal.

C41. Elements of responses which provide information that could impact on the proposal will fall into two types, those which do lead to changes and those which could not. Again, where a response does not impact on the final proposal, the change sponsor must set out the rationale for not acting on proposed changes. This may be because changes wouldn't allow the sponsor to achieve the design principles, because they would be operationally or commercially unviable or because they would have a negative impact on other stakeholders.

C42. In explaining why it has not altered its proposal based on feedback, the change sponsor may wish to pre-populate check boxes of potential reasons and assign a reason to each element of feedback provided.

C43. Responses that may not impact on the final proposals may still contain valuable information, and it is important that sponsors capture and understand feedback from the consultation even where it does not impact on the final proposals.

C44. Table C2 **overleaf** sets out how these categories break down and affect proposals.

C45. When the categorisation and subsequent consultation report are published, the change sponsor must set out clearly what its approach to categorisation has been, where challenging issues have been tackled and how they have been resolved. The most important principle to adopt is transparency – being clear why responses have been categorised as they have and how all feedback will be acted upon.

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Table C2: Categorisation of consultation responses

Type	Responses which may impact final proposals		Responses which do not impact final proposals
<p>Description</p>	<p>Responses which have been categorised as having the potential to impact on the proposal would include new information or ideas that the change sponsor believes could lead to an adaptation in a lead design option or a new design option.</p>		<p>The content of this response would not include new information or ideas that could lead to an adaptation in a lead design option or a new design option but may include other information that should be logged and considered. For example responses which criticise the consultation format should give sponsors insight to improve future engagement; sentiments identified around trust will help to identify areas where additional future engagement may improve relationships; and criticism of historic activity may help to avoid similar situations in future.</p> <p>The change sponsor must be able to show how it has heard, understood and classified responses which do not impact its final proposal, and set out clearly why.</p>
Sub type	Responses which have impacted the final proposal	Responses which have not impacted the final proposal	
<p>Description</p>	<p>The change sponsor must show how the response has been acted on and what changes have occurred to their proposal.</p>	<p>The change sponsor must show why the response has not been acted on and explain why the proposal cannot be modified to meet the recommendation.</p>	

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Stage 4: UPDATE and SUBMIT

Step 4A: Update design (published outputs: consultation response document including change log, Final options appraisal, revised design)

Step 4B: Submit proposal to CAA (published outputs: full and redacted airspace change proposal, executive summary and layperson's guide)

C46. The change sponsor must be clear to stakeholders about how proposed airspace changes evolve through the stages of the process and how their feedback has informed these evolutions. At this stage, the change sponsor must set out clearly what has changed between the initial consultation and the final submission, and why those changes have happened. This will build on the consultation response categorisation created in Step 3D.

C47. Stakeholders (and the CAA) must also be able to see clearly how the design principles initially developed in Stage 2, and expanded upon at Stage 3 are being met by the final design.

C48. It is important to keep this process simple – as noted under Stage 3D, one effective mechanism is to adopt the 'We asked, you said, we did' model. This briefly sets out what the initial proposal was, how consultees responded, and what has therefore changed. Any categorisation and analysis that fed into this structure should be set out as an appendix.

C49. Stakeholder engagement during this stage will be even more important if there has been a groundswell of opinion in relation to an issue that the change sponsor does not feel able to address. In this case, alongside written material, further face-to-face engagement should be considered, to clearly and simply contextualise the rationale for stakeholders.

C50. It is possible that following Step 4A, the CAA may require the change sponsor to re-consult if the Final options appraisal shows that the impact of the design has changed substantially. In this circumstance, the CAA will also require a further consultation strategy to ensure that the second round of consultation is managed effectively.⁷⁸

78. There is relevant case law which influences when there is a requirement to re-consult, for example on whether there is "a fundamental difference between the proposals consulted on and those which the consulting party subsequently wishes to adopt". 'Fundamental' was defined as "a change of such a kind that it would be conspicuously unfair for the decision-maker to proceed without having given consultees a further opportunity to make representations about the proposal as so changed." *Kenneth Parker QC (then sitting as a Deputy High Court judge) R (Elphinstone) v Westminster City Council, [2008] EWHC 1287 (Admin)*.

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Stage 5: DECIDE

Step 5A: CAA assessment (published outputs: confirmation that document check complete and of decision and call-in request timescales, dates of expected decision and of any Public Evidence Session, written submissions to and transcript of any Public Evidence Session, diary of any additional meetings between CAA and stakeholders, request for any further technical details or amendments, response or revised proposal as 'version 2.0' (if any).)

C51. This stage is unlikely to require stakeholder engagement from the change sponsor, beyond responding to queries, and being aware that the online portal will be updating key groups on the progress. This will include making transparent (using the online portal) any technical or clarification questions raised by the CAA and the change sponsor's responses (see [Appendix G](#)).

Public Evidence Session

C52. From the CAA's perspective, the Public Evidence Session (for Level 1 airspace changes) may be a significant point of stakeholder engagement. When the final proposal is published by the change sponsor, the CAA will also notify stakeholders of the date of the Public Evidence Session (where it is proportionate to hold one) providing at least four weeks' notice. The session will be a facilitated evidence-giving session at which representatives will be expected to speak themselves without formality or legal representation, in order to reinforce that information-receiving nature of the session.

C53. Using the portal, interested parties will be able to book five-minute speaking slots on a first-come, first-served basis, to present their views on the airspace change proposal to the CAA decision-maker directly. Representative groups will be able to book 10-minute slots. Attendees will not have the opportunity to challenge what other speakers say. Following the Public Evidence Session, the CAA will publish a transcript.

C54. The CAA will not require a change sponsor to attend the session, as it is designed to offer third parties the opportunity to speak directly to the decision-maker. The change sponsor may still attend – not to argue its case, but, should the Chair invite it to do so, to offer any clarification that is needed.

Step 5B: CAA decision (published outputs: draft decision document (if any) and related feedback, Secretary of State call-in requests and related CAA assessment, any notification that the proposal is eligible for call-in and has been called-in by the Secretary of State (if applicable), decision document including Final options appraisal assessment, safety review (plain English version), operational and environmental assessments, and consultation assessment and statement).

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C55. The final decision document is a CAA publication, and the CAA may choose to engage stakeholders directly at this point (as it may wish to at various other stages of the process). However, it is the change sponsor's role to implement the airspace change and the change sponsor is likely to be the most relevant source of information and recipient of challenge from stakeholders. The CAA will therefore always coordinate with the change

sponsor at this stage to ensure that the change sponsor is clear on our approach to publicising our decision and is aware of our intentions with regard to engaging stakeholders. However, in principle the airspace change and associated stakeholder engagement is owned by the change sponsor, and it has responsibility for maintaining a positive and effective relationship with stakeholders.

DECIDE gateway

At the 'Decide' gateway, the CAA will be assessing the full proposal, and Final options appraisal, both of which may have been changed as a result of consultation during Stage 3. Part of the suite of documents that will inform the CAA's decision is the sponsor's categorisation of consultation comments, and the consultation response document setting out how the change sponsor has acted on the feedback provided during consultation. During the Step 5A assessment period, the CAA will produce a consultation assessment, designed to allow the CAA decision-maker to assess whether the proposal was adequately consulted on, in accordance with this guidance and other sources of best practice, and in line with the consultation strategy approved at the 'Consult' gateway. To be approved, a change sponsor must show that it has appropriately categorised consultation responses, and correctly identified the issues arising from the consultation and responded to them appropriately. In developing the assessment, the CAA will compare the change sponsor's consultation feedback report against actual consultation responses and any material provided through the Public Evidence Session, where one has taken place.

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Stage 6: IMPLEMENT

(Amendment to the Aeronautical Information Publication is published)

- C56.** At this point change sponsors must be prepared to give stakeholders a clear understanding of the next steps for the proposal. The CAAs (or if applicable the Secretary of State's) decision will have been published on the online portal and therefore visible to all.
- C57.** Change sponsors must also consider how to notify relevant stakeholders such as members of the local community and other stakeholder groups about the ultimate outcome of the consultation and the decision. In order to publicise a forthcoming change to as many airspace users (and perhaps service providers) as possible, the change sponsor should consider contacting the Ministry of Defence, the commercial General Aviation press, local General Aviation events, relevant community organisations and the local press. All that may be needed is a reference to the online portal where the decision has been published.
- C58.** Most importantly, this means letting those impacted know when they may begin to experience changes, how the change sponsor intends to manage the transition from the change process to business as usual, and that there will be a post-implementation review. For those changes where it is appropriate, this may be the point at which compensation is made available and mitigations are put in place by change sponsors.

Stage 7: POST-IMPLEMENTATION REVIEW

Published outputs: notification of change sponsor data collection requirements (in CAA decision), post-implementation review evidence submission, stakeholder feedback on change sponsor's submission, post-implementation review report, review of modification requirements prepared by sponsor (if applicable), report on effect of modifications (if applicable), review of effect of modifications implemented by sponsor (if applicable))

- C59.** In Stage 7 the CAA commences a post-implementation review, usually 12 months after implementation (see [Appendix H](#)). The purpose of the review is for the change sponsor to carry out a rigorous assessment of, and the CAA to evaluate, whether the anticipated impacts and benefits in the original proposal and published decision are as expected, and where there are differences, what steps (if any) are required to be taken.
- C60.** The change must be considered in relation to the original Statement of Need, design principles and options appraisal. As stakeholder feedback and engagement is a crucial element in each of these stages, it is expected that stakeholders will play a role in the post-implementation review, but this is not a formal consultation process.
- C61.** Stakeholder comments or complaints specifically related to the change that are received after implementation of the proposal but before the review commences must be collated by the change sponsor in the CAA-agreed format. Any direct feedback that the CAA receives during this period will be forwarded to the change sponsor for inclusion in that feedback dataset.

Appendix C

Consultation and engagement

- C62.** Once the change sponsor's data submission is published on the portal (as described in [Appendix H](#)), there will be a 28-day window during which any stakeholder may provide any feedback it wants the CAA to take into account when carrying out this review about whether the impacts of the change are those expected, 12 months on. This allows stakeholders to be confident that their feedback is visible to the CAA. This process should be openly and widely communicated to stakeholders. This feedback must be submitted using the online portal.⁷⁹ Submissions are limited to one per individual (verified by email address). We give no assurance that we will take account of submissions made outside the 28-day window.
- C63.** All original audiences must be informed by the change sponsor that the post-implementation review feedback window is approaching, with a reminder closer to the time. The portal will publicise that the review is taking place and will be the place where feedback is collected. As implementation may have drawn interest from new stakeholders, this exercise should be open to all.
- C64.** Before feedback is published on the portal, the CAA will moderate it to remove unacceptable material.⁸⁰ Guidelines on what we regard as unacceptable can be found in [CAP 1619](#), but broadly we will moderate responses solely to prevent publication of defamatory, libellous or offensive remarks, or material that causes legal issues like copyright infringement or personal data.
- C65.** The post-implementation review will result in a CAA report which will detail whether the anticipated impacts and benefits in the original proposal and decision have been delivered, any differences from what was expected and what steps (if any) we require to be taken where there are differences. This may result in requirements for modifications or a requirement for a new airspace change proposal. These outcomes will be clearly signposted on the portal. Where the outcome is that the change sponsor will need to propose a new airspace change in order to achieve the original proposal's objective, the change sponsor will be expected to communicate its intentions clearly and quickly to stakeholders.

79. The CAA will also accept postal responses for the time being. We will reconsider in the light of experience whether this is still necessary when we conduct a review of the airspace change process in 2021 three years after implementation, to judge whether the administrative burden of uploading, monitoring and analysing postal responses remains proportionate.

80. The CAA's review after three years will also reconsider in the light of experience whether it is practical for the CAA to carry out this moderation role. We may decide, instead, that the change sponsor should moderate the responses in accordance with CAA guidance, requiring change sponsors to seek our approval before any redactions are made.