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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

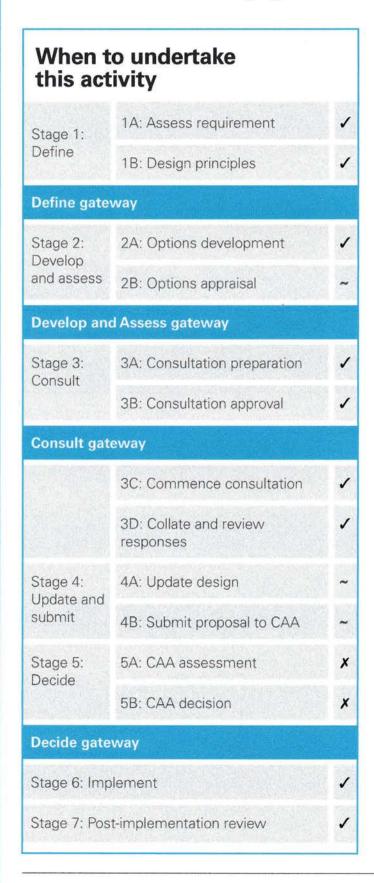| Stage 6: Implement		✓
Stage 7: Post-implementation review		✓

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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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 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 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 will 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
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, sponsors must submit a consultation strategy to the CAA for approval prior to the consultation beginning. This will give the CAA the opportunity to consider the change sponsor's approach to their unique local circumstances and asses how they intend to manage them proportionately.

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 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 sponsor has heard and how this feedback has informed the development of its proposal. How the 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 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 portal rather than submitted privately, 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 that we are obliged to apply the Freedom of Information Act to any information held by the CAA).[56]

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.

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56. 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.[57] 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. 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 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) 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.

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57. 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 changes, that an engagement strategy is developed during Stage 1 and enhanced during Stage 2 following initial contact with stakeholders. The change sponsor will then be well prepared for devising and submitting the required consultation strategy at Stage 3. This strategy will not be reviewed by the CAA until the 'Consult' gateway, but will help sponsors to structure engagement during earlier Stages.

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. 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)

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, 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 proposer 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 principles[58] 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 proposals 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.

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58. 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

Audience	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. 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. Sponsors 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.
Approach	Sponsors 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, sponsors must set out how they intend to ensure all audiences are able to respond effectively. Engagement exercises with large numbers of people are challenging to manage in practice, and consultation strategies must set out how sponsors intend to respond to unexpected events and challenges, including escalation and extension plans where appropriate.
Materials	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. Sponsors may consider guidance published by the Plain English Campaign and the Consultation Institute useful.
Length	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: • 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, 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 strategy developed in Step 3A. During consultation, deviations from the strategy should be minimal, and only in line with previously approved escalation and extension plans detailed in the consultation strategy to deal with unforeseen issues.

During the consultation

C35. The consultation period is another point in the process where 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.