

MINUTES OF SNOWDONIA AEROSPACE LLP AIRSPACE CHANGE PROPOSAL (ACP) FOR AN AIR TRAFFIC ZONE (ATZ) AT LLANBEDR AIRFIELD ASSESSMENT MEETING HELD BY SKYPE, various locations on 23rd January 2020

26/01/2020

Minutes distribution to Snowdonia representatives and [REDACTED] for re-distribution CAA.

Present	Appointment	Representing
[REDACTED]	Principal Airspace Regulator	CAA
[REDACTED]	Principal Airspace Regulator	CAA
[REDACTED]	Airspace Regulator (Technical)	CAA
[REDACTED]	Airspace Regulator (Engagement & Consultation)	CAA
[REDACTED]	Airspace Specialist (Environment & Analysis)	CAA
[REDACTED]	Airspace Regulator (Utilisation)	CAA
[REDACTED]	Inspector ATS (Operations)	CAA
[REDACTED]	Airspace Regulator (Technical)	CAA
[REDACTED]	Airspace Change Account Manager	CAA

Snowdonia Aerospace LLP (SA) Attendees:

[REDACTED]	SA
[REDACTED]	SA
[REDACTED]	SA

	ACTION
<p>Item 1 – Introduction</p> <p>This meeting followed on immediately after the Danger Area (DA) ACP Assessment meeting. [REDACTED] restated the CAA Assessment Meeting opening statement for ACP's.</p> <p><u>CAA Assessment Meeting Opening Statement</u></p> <p>CAA noted that the Agenda (as listed as Item Nos in these minutes) and Presentation associated with this meeting were received in advance of the Assessment Meeting and confirmed that the documents would be published together with minutes of the meeting on the CAA website. CAA explained the purpose of the meeting and confirmed that the meeting was an Assessment Meeting and not a Gateway. The CAA reinforced that the Sponsor was required to provide a broad description of their proposed approach to meeting the CAA's CAP 1616 requirements but the CAA was not deciding whether the proposed approach met the detailed requirements of the CAA's process at this stage. The purpose of the Assessment Meeting (set out in detail in CAP 1616) was broadly:</p> <ul style="list-style-type: none"> • for the Sponsor to present and discuss their Statement of Need, 	

- to enable the CAA to consider whether the proposal concerned falls within the scope of the formal airspace change process,
- to enable the CAA to consider the appropriate provisional Level to assign to the change proposal.

Additionally, the Sponsor was required to provide information on how it intended to proceed to fulfil the requirements of the airspace change process and to provide information on timescales. Lastly, the Sponsor was required to provide information on how it intended to meet the engagement requirements of the various stages of the airspace change process.

Item 2 – Statement of Need (discussion and review)

Llanbedr Airspace (ATZ) ACP-2020-02

CAA advised that this ACP for an ATZ would be classified as Issue 1. The original ACP application had embraced both a DA and the ATZ. Subsequent to this revised applications were made to split the two different proposals and make independent applications for each ACP. The DA, previously discussed, had taken the original application submission number and the revised Statement of Need for that required it to be called Issue 2.

The Statement of need for the ATZ was new and has been allocated a different number and consequently could be named as Issue 1

■ introduced the SA Presentation commenting that there was 80% commonality in terms of context to that of the DA Presentation. He read the Statement of Need.

“To provide protection for all traffic on the manoeuvring area at Llanbedr (EGFD) and all aircraft flying in the vicinity of the aerodrome via implementation of a standard Aerodrome Traffic Zone (ATZ) extending from the ground up to 2000 feet with a radius of 2.5nm around the midpoint of Runway 17/35”

Item 3 – Issues or opportunities arising from proposed changes

The opportunity from this proposed change relates to work in support of military aircraft flying training. Llanbedr Airfield has a long relationship with RAF Valley and was previously regularly used by them for a range of operations. More recently they operated from the airfield for a week of flying training in 2017 during the Eisteddfod.

Post Meeting Note:

Several Reports have highlighted that the UK military flying system is in deep crisis and there is increasing pressure being made to prioritise getting pilots to the front line quicker. UK military flying training has a pedigree honed over the 100 years' life of the Royal Air Force, but that pedigree is arguably right now at the most risk of long-term damage in its lifetime. Hundreds of young student aircrew are stuck in a logjam between officer training and frontline flying and it is not yet known the long-term implications of years spent 'holding'. This is an issue now being addressed at the highest level and requires working partnerships to find innovative and long-term solutions. These waits have consequences for the long-term implications of the current crisis and impacts the future of UK defence and the reputation of British air power. In the six years to 2018/19, the MoD failed to meet its training needs by an average of 45 per cent, equating to a shortfall of 125 aircrew a year.

<https://www.telegraph.co.uk/news/2019/05/13/aircraft-shortages-lack-trained-instructors-adds-years-military/>

<https://www.aerosociety.com/news/uk-military-flying-training-heading-for-the-cliff-edge/>

<https://www.bbc.co.uk/news/uk-47420698>

<https://www.nao.org.uk/wp-content/uploads/2019/09/Investigation-into-Military-flying-training.pdf>

RAF Valley currently operates the Hawk TMK2 in the fast jet role. Future operations will include the Texan TMK1 which will increase the flying rate at the base. In addition to this fixed wing tasking, the Jupiter helicopter also operates at RAF Valley. It is understood the additional flying hours are likely to add a greater degree of congestion and complexity into an already busy piece of airspace. Until recently, Llanbedr was utilised as a Relief Landing Ground for RAF Valley and in 2001 had 5,000 annual fast-jet movements in and out of the airfield.

If Llanbedr Airfield was once again made available to RAF Valley aircraft and they took the opportunity to utilise it as previously, this would potentially alleviate congestion and allow Hawks to operate at Llanbedr.

Additionally Llanbedr could potentially be held as a diversion airfield for RAF Valley aircraft, as it is understood the distance from RAF Valley to Llanbedr is approximately half the distance to the nearest other current diversion airfield used by RAF Valley. This would potentially mean a fuel saving of approximately 1000kgs per flying event (a 50% utilisation rate would mean an annual saving of approx. 650,000 litres – or an additional 75 hours flying time capability, per annum.)

<p>CAA response to Post Meeting Note:</p> <p>The Sponsor advises that these notes have been shared with the MOD subsequent to the Assessment Meeting and prior to publication.</p>	
<p>Item 4 – Options to exploit opportunities or address issues identified</p> <p>It is being considered that Llanbedr may present one the safest and most cost effective options for the RAF particularly for Hawk flying training. In support of this and the wider UK MoD remit for military flight training, SA is looking to secure both an aerodrome licence and the reinstatement of the airfields former ATZ.</p> <p>SA have already applied to the CAA for both an aerodrome licence and for an Air Navigation Service Provider (ANSP) provision. Both are progressing well and are earmarked for completion and approval spring 2020.</p> <p>Alongside this there is the need to re-constitute the ATZ that had previously been there since before 2004. There is a clear historical precedent for an ATZ at Llanbedr Airfield to support military flying training. RAF Valley flew Hawks on a trial at Llanbedr during the Eisteddfod event in 2017. (The previously provided Presentation incorrectly referred to 2018 and has now been amended).</p> <p>The objective as stated is the protection of traffic on the manoeuvring area and in the vicinity of the aerodrome during these operations.</p> <p>Subject to the establishment of an ATZ at Llanbedr the RAF are looking to undertake between 100 and 200 movements per week with a maximum 50 movements per day in a peak.</p> <p>Post Meeting Note:</p> <p>The aircraft movement numbers quoted above reflect high intensity training in a six week period. This would be followed by two weeks of low intensity activity.</p> <p>Overall proposed military aircraft movements would be in the region of 4,000 the first year of RAF Valley undertaking operations at Llanbedr, 5,000 the second year and 6,000 subsequent years.</p> <p>There are currently operations most days with an average of 100-200 movements per month.</p> <p>■ said this does not form a part of the Future Airspace modernisation strategy but it does not conflict with it.</p>	
<p>Item 5 – Provisional indication of the scale level and process requirements</p> <p>■ said this was an odd application really given the nature of the ATZ and the driver being to increase military traffic, where an ATZ application would in general be driven by current traffic. ■ could confirm however that as this group is not part of the Military or acting on behalf of the Military then the ACP would not be classified with the 'M' status. There is a specific ATZ policy paper which</p>	<p>CAA to provide proposed Level that this application</p>

<p>would normally allow for ATZ applications to be progressed as Level 2C however in this instance due to the unique nature of this application the CAA would refrain from giving an indicative level at the meeting but would consider post meeting and inform the Sponsor as soon as practicable.</p> <p>█ pointed out that the indicative timeline he had formulated predated the new ATZ Policy. As written it anticipated multiple gateways. An ATZ itself as a design is clearly defined and it would seem Gateway 2 and 3 could be at the same meeting. What needs to be identified is the nature of the risk.</p> <p>Post Meeting Note – the following update was sent on the 30 Jan 20, from the CAA to the Sponsor</p> <p>With regard to the ACP 2020-02 ATZ Application, post the assessment meeting we reviewed the applicability of the current ATZ policy to your proposed application. Within your presentation you outlined a position where the application for the ATZ was predicated upon and driven by an external driver. Your position was that if the ATZ were created the number of movements at the airfield would significantly increase; this increase would be directly attributable to the creation of the ATZ and if the ATZ were not created this significant increase may not occur. The published ATZ policy in effect scales the current CAP 1616 process and progresses this as Level 2C. Progressing such proposals as Level 2C stages rather than Level 1 (as they otherwise likely would be) is predicated amongst other things on the driver for the creation of the ATZ being based upon current or similar traffic levels, where the creation of the structure would only effect other airspace users. As outlined within your presentation the driver for the creation of an ATZ is not based upon current or similar traffic levels but on a significant increase in movements and a significant change to the type of aircraft routinely operating at Llanbedr. Therefore, this change will be categorised provisionally by ourselves as a Level 1 change. It should be noted as explained in the meeting this is a provisional level that will be confirmed or otherwise at the Develop and Assess Gateway meeting.</p> <p>If you believe this could be considered as an alternate Level you are permitted to provide mitigation to demonstrate why this could be considered as another Level, this would then be considered at the Gateway Assessment meeting where the level would be determined. Furthermore, in line with CAP1616 the process requirements within any Level are scalable, subject to you providing sufficient mitigation.</p>	<p>would initially be outlined at.</p>
<p>Item 6 – Provisional process timescales*</p> <p>█ said in relation to timeline that the 12 weeks consultation could be reduced but it would be subject to justification. The Policy does require consultation.</p> <p>█ pointed out that SA had been engaging with stakeholders for many years through the RAF Valley North Wales Airspace Symposium and had made a number of presentations to keep all informed.</p> <p>█ said the dates and presentations and breadth of communication would be relevant to the application.</p> <p>█ said we must be quite clear why there are two separate ACP applications being made and why there may be engagement on one and not the other. It is necessary to highlight that there are two different applications being made for different activities although there were common elements between the two.</p>	<p>SA to ensure it is made clear within both applications that they are for separate activities and are independent of each other</p>

<p>■ questioned the option of putting in a Temporary ATZ through AROps as he had been previously advised that this was possible as an interim measure.</p> <p>■ said that it was possible to apply for a Temporary ATZ however SA would need to follow the Temporary process to achieve this, it was not merely the release of a NOTAM. Furthermore, it should not be assumed that a Temporary ATZ would be granted but would be subject to a regulatory decision. ■ highlighted that existing Temporary ATZ's that have been activated by NOTAM had previously approved and were in many instances notified structures. These approvals were normally in association with race meetings or events of a short term nature and it was likely CAA would still require some form of consultation process under CAP1616 temporary process.</p> <p>■ said while we were dealing with RAF Valley direct in relation to the consultation this must be through ■ or a fellow representative at DAATAM. For the ATZ it would be relevant to consult with any neighbouring airfield and users of airspace and the local community.</p> <p>■ said the fact is SA are entering a commercial operation with RAF Valley for which they have to be Licensed but he wondered if RAF Valley would operate without an ATZ being present.</p> <p>■ said timelines would be revisited with an option to combine gateways. Regarding consultation this could be by direct engagement. CAA would analyse the timeline proposed against existing commitments and SA would need to provide justification for scaling.</p> <p>There was some discussion about re-issuing documents on the portal but CAA said everything that was on the portal needed to remain in the interest of transparency. SA needed to write a note confirming why there was a new 2020 Statement of Need Issue 1 for the ATZ.</p> <p>* The provisional timeline put forward at this assessment meeting will be subject to change by the CAA. This will currently mainly be for two reasons;</p> <ol style="list-style-type: none"> 1. The SoS has directed us to prioritise GNSS applications which may have an impact on your ACP if we need to direct resource accordingly 2. The FAS(S) masterplan requires proposals within that plan to be progressed in a coordinated way, in accordance with a programme plan. Once this masterplan has been accepted by us, it may require us to rearrange Gateway bookings to achieve coordination which may include changing a gateway slot that you have previously been targeting. 	<p>CAA to provide dates of Gateway Review Meetings</p>
<p>Item 7 – Next steps</p> <ol style="list-style-type: none"> 1. SA to resubmit timeline for ACP-2020-02 ATZ proposing timeline to the CAA following the assessment meeting discussion. 2. SA to provide a written rationale with justification for any proposed scaling of its ACP-2020-02 ATC application 	

Item 8 – Any other business None	