

Justification for scaling of the CAP1616 Airspace Change Proposal ACP-2020-02, Llanbedr Aerodrome Traffic Zone (ATZ)

The CAP1616 airspace change process has seven formal stages, some of which have more than one step. However, it is recognised that requested airspace changes can vary hugely in size, scale and complexity and this variation has led the CAA to scale the process accordingly (Para. 50). Furthermore, the CAA will consider requests from the Airspace Change Sponsor for additional scaling of the process when there is a good reason and it is proportionate to do so. In this regard, Para 78 of CAP1616 states that “The CAA is under a legal duty not to apply the process in a manner that cannot accommodate any flexibility”.

Snowdonia Aerospace therefore puts forward the following justification for the scaling and stage timescale proposed for Airspace Change Proposal ACP-2020-02, Llanbedr Aerodrome Traffic Zone (ATZ):

1. Llanbedr Airfield (EGFD), Gwynedd, is sited on a remote coastal promontory at the northerly end of Cardigan Bay ([view on Google Maps](#)) the nearby population density is very low (<50 people per square km, ref: [National Statistics Wales, June 2018](#) and also, [Annual Lower Super Output Area \(LSOA\) Population Estimates, 2018](#)), the approaches to the main runway are over water and it is surrounded by Class G airspace with low levels of air traffic, both in terms of passing aircraft and operations from the aerodrome itself;
2. The Airspace Design being put forward for the Permanent Airspace Change is a standard Aerodrome Traffic Zone (ATZ) as defined in Article 5 of the Air Navigation Order, 2016, ref: [Air Navigation Order, 2016](#);
3. Scaling and timescales for CAP1616 Stages 1 (Define) and 2 (Develop & Assess) have been proposed to reflect points (1) and (2) above. We are confident that using a standard ATZ design and re-visiting/updating of our most recent airspace engagement process, ref: Attachment 1 - QINETIQ/MS/AD/TWP1404762, 31st October 2014, will allow us to produce the following outputs and upload the documents to the online portal within the timescales identified in Annex A:
 - Stage 1B, Airspace change proposal design principles;
 - Stage 1B, Explanation of how these were influenced through an engagement process;
 - Stage 2A, Airspace change design options;
 - Stage 2A, Design principle evaluation;
 - Stage 2B, Options appraisal (phase I - Initial) including safety considerations;
4. Llanbedr aerodrome is recognised by both aviation stakeholders and local community stakeholders as having a long history of military aviation and drone operations supported by previous instantiations of an Aerodrome Traffic Zone and Danger Area (Ref: Wendy Mills, “A History of Llanbedr Airfield 1941 – 2012”, J.W.F.M. Promotions, first edition 31st March 2012, ISBN-10: 0951086014);
5. Hawk T2 aircraft from 4(R) Squadron, RAF Valley, operated from Llanbedr for a week during August 2017 without incident or concern from local stakeholders. Future operations associated with the Permanent Airspace Change will be consistent with both this recent activity and historical record;
6. Eighty-seven individuals or organisations were engaged as part of a previous Temporary Danger Area consultation (Attachment 1). The stakeholders were made up of local and national aviation organisations, local and national land-based organisations and identified individuals (landowners, Member for Parliament, *etc*). A total of 17 responses were received. Of the 87 stakeholders, 71 (82%) did not respond, 5 (6%) were in favour of the proposal, 2 (2%) were against the proposal and 9 (10%) were assessed as neutral;

7. Snowdonia Aerospace has continued to actively engage with local stakeholders throughout this period, most notably via attendance at the regular RAF Valley Airspace Users Symposium, ref: Attachment 2 - Presentation to RAF Valley Airspace Users Symposium, 2018;
8. Scaling and timescales for CAP1616 Stages 3 (Consult) and 4 (Update & Submit) have been proposed to reflect points (4) to (6). We are confident that using a standard ATZ design, extending the previous engagement process to a public consultation and building on our ongoing engagement with the stakeholder community will allow us to produce the following outputs and upload the documents to the online portal within the timescales identified in Annex A:
 - Stage 3A, Draft consultation strategy
 - Stage 3A, Draft consultation documents
 - Stage 3A, Options appraisal (phase II - Full)
 - Stage 3B, Publication of consultation strategy
 - Stage 3B, Publication of options appraisal (phase II - Full)
 - Stage 3C, Publication of consultation documents and supporting material
 - Stage 3C, Responses to queries, FAQs, engagement record
 - Stage 3D, Categorisation of responses
 - Stage 4A, Consultation response showing design changes in light of responses
 - Stage 4A, Options appraisal (phase III – Final) including safety assessment
 - Stage 4A, Revised design
 - Stage 4B, Airspace Change Proposal

Note that the scaling and timescales put forward in Annex A assumes the Airspace Change application is assessed as Level 1 as per the provisional judgement at the initial Assessment Meeting. We understand that the final level assessment and timescale will only be confirmed at the at the Develop & Assess Gateway Review. We assert that this assessment is not proportionate when compared to the current [CAA ATZ Policy Statement](#), that it runs counter to the intent of Para. 50 and Para. 78 and that a Level 2C assessment should prevail.

CLOSE

ANNEX A - Scaling + stage timescale for ACP-2020-02, Llanbedr ATZ

Week #	Start Date	Duration	Step	Comments
1	13/01/2020	5 weeks	Stage 1A Assess Requirements	Complete, Assessment Meeting held on 23/01/20
2	20/01/2020			
3	27/01/2020			
4	03/02/2020			
5	10/02/2020			
6	17/02/2020	4 weeks	Stage 1B Design Principles	Reduced from suggested 6 weeks to 4 weeks based on use of standard ATZ design as per Article 5, ANO, 2016
7	24/02/2020			
8	02/03/2020			
9	09/03/2020			
10	16/03/2020	4 weeks	Stage 2A Options Development	Reduced from suggested 6 weeks to 4 weeks based on use of standard ATZ design as per Article 5, ANO, 2016
11	23/03/2020			
12	30/03/2020			
13	06/04/2020			
14	13/04/2020	5 weeks	Stage 2B Options Appraisal	Reduced from suggested 6 weeks to 4 weeks based on use of standard ATZ design as per Article 5, ANO, 2016 plus 1 week for Easter holidays
15	20/04/2020			
16	27/04/2020			
17	04/05/2020			
18	11/05/2020	2 weeks	DEFINE, DEVELOP & ASSESS GATEWAY	COMBINED DEFINE, DEVELOP & ASSESS GATEWAY REVIEW PROPOSED FOR FRIDAY 29TH MAY 2020
19	18/05/2020			
20	25/05/2020	4 weeks	Stage 3A Consultation Preparation	Reduced from suggested 8 weeks to 4 weeks based on use of standard ATZ design as per Article 5, ANO, 2016 and ongoing engagement with key stakeholders
21	01/06/2020			
22	08/06/2020			
23	15/06/2020			
24	22/06/2020	2 weeks	Stage 3B Consultation Validation	As per proposed CAP1616 timetable
25	29/06/2020			
26	06/07/2020	2 weeks	CONSULT GATEWAY	CONSULT GATEWAY REVIEW PROPOSED FOR FRIDAY 31ST JULY 2020
27	13/07/2020			
28	20/07/2020	8 weeks	Stage 3C Commence Consultation	Consultation reduced from suggested 12 weeks to 8 weeks based on relatively small size of stakeholder community and ongoing engagement with key stakeholders
29	27/07/2020			
30	03/08/2020			
31	10/08/2020			
32	17/08/2020			
33	24/08/2020			
34	31/08/2020			
35	07/09/2020			
36	14/09/2020	4 weeks	Stage 3D Collate & Review Responses	Reduced from suggested 12 weeks to 4 weeks based on relatively small size of stakeholder community and ongoing engagement with key stakeholders
37	21/09/2020			
38	28/09/2020			
39	05/10/2020			
40	12/10/2020	2 weeks	Stage 4A Update Design	Reduced from suggested 4 weeks to 2 weeks based on use of standard ATZ design as per Article 5, ANO, 2016 and ongoing engagement with key
41	19/10/2020			
42	26/10/2020	2 weeks	Stage 4B Submit Proposal to CAA	As per proposed CAP1616 timetable
43	02/11/2020			
44	09/11/2020	19 weeks	Stage 5A CAA Assessment Stage 5B CAA Decision	16 weeks (minimum) for Stage 5 Decide, with an additional 1 week document check (i.e. 17 weeks total), as advised by CAA on 14/02/20, plus 2 weeks for Christmas and New Year holidays
45	16/11/2020			
46	23/11/2020			
47	30/11/2020			
48	07/12/2020			
49	14/12/2020			
50	21/12/2020			
51	28/12/2020			
52	04/01/2021			
53	11/01/2021			
54	18/01/2021			
55	25/01/2021			
56	01/02/2021			
57	08/02/2021			
58	15/02/2021			
59	22/02/2021			
60	01/03/2021			
61	08/03/2021			
62	15/03/2021			
63	22/03/2021			
64	29/03/2021			
65	05/04/2021	1 week	DECIDE GATEWAY	DECIDE GATEWAY REVIEW
66	12/04/2021	14 weeks	Stage 6 Implement	Target = AIRAC 07 2021 Sponsor change cutoff 16/04/21 AMDT published 03/06/21 AIRAC effective date 15/07/21
67	19/04/2021			
68	26/04/2021			
69	03/05/2021			
70	10/05/2021			
71	17/05/2021			
72	24/05/2021			
73	31/05/2021			
74	07/06/2021			
75	14/06/2021			
76	21/06/2021			
77	28/06/2021			
78	05/07/2021			
79	12/07/2021			