

Llanbedr Aerodrome Air Traffic Zone (ATZ) AIR ACP-2020-02

Ref: Initial Engagement Letter - Responses.

Glossary of Terms

ACP	Airspace Change Proposal	The proposal being submitted to the Civil Aviation Authority to change the design of the airspace over the aerodrome to ensure safe separation between aircraft
CAA	Civil Aviation Authority	The regulator for the aviation industry in the UK
SAC	Snowdonia Aerospace LLP	The company which controls the aerodrome
RDT&E	Research, development, test and evaluation	
ATZ	Aerodrome Traffic Zone (focus of the first technical proposal document)	A circular designated area of airspace above the aerodrome, which is being proposed as a zone in which proper air-traffic control measures would be implemented for the safety of all users
DA	Danger Area (focus of the second technical proposal document)	A proposed airspace larger than the ATZ to allow RDT&E air activity providing segregation and safety of aircraft (especially unmanned) and also a corridor to link with other airspace providing access to unlimited altitude.
	Runway Protection Zone	An area around the runway which is controlled to ensure the enhanced protection of people and property

Dear All,

We refer to our earlier engagement letter dated 05 May 2020 together with Questionnaire and subsequent correspondence seeking feedback on our Airspace Change Proposal (ACP) in relation to the above. In the first instance we would like to thank all respondents for their time and assistance in replying and completing the

Questionnaire. The feedback, as advised previously, will help us inform the extent and operational model associated with the future ACP. Over and above replying to the specific questions raised within our Questionnaire many of the responses received enquired about the broader development of the airfield and how this proposed ACP fitted in to that development and what further opportunities there may be to comment on the proposed ACP in the future.

Reflective of the responses received we now write to all parties whom we wrote to initially (not just to those who responded directly) to seek to address the questions raised, further explain the process involved and set out the specific results of the initial engagement and how this will influence the ACP.

Background.

1. The Snowdonia Aerospace LLP (SAC) proposition for Llanbedr Aerodrome is to develop the site as a flexible and multi-use centre that maximises the potential across a range of aerospace uses, focussing on the research, development, test and evaluation (RDT&E) of novel aerospace systems and emerging future flight technology, including drones (particularly “drones-for-good”), electric aircraft, urban air mobility vehicles, satellite launch and space-related training. Ancillary to these activities will be the ongoing support to military aircraft training at RAF Valley, consistent with the heritage and established use of the site. Further ancillary activities will also include General Aviation and Leisure Flying.
2. A recent Economic Impact Assessment concluded that a mixed-use development of this nature along with a range of supporting facilities could contribute 515 jobs and £19.5m/annum of Gross Value Added (GVA) at the local level and 765 jobs and £34m/annum of additional GVA in Wales.
3. Developing the airfield will require physical improvements to the aerodrome (which include new access improvements and replacement modern buildings) and improvements to the way in which air traffic is controlled and kept safe. There are three aspects to this, and SAC are investing in all three
 - Air Navigation Service Provision (providing the required Air Traffic and other information to air users - SAC became CAA approved to provide this function directly in March 2020),
 - Aerodrome licencing (which is ongoing), and
 - Airspace Change Proposals (ACP) for both a permanent Danger Area (DA) and Aerodrome Traffic Zone (ATZ) (which are the subject of the current engagements).

Scope of the current engagement v. public consultation.

4. The CAA Civil Aviation Publication CAP1616 presently defines a six-stage process which has to be followed to secure the implementation of a permanent airspace change, some of which have more than one step. The initial technical documents which you were sent formed part of a “stakeholder engagement” as part of Stage 1B to help shape the technical design principles and was **not** a formal “public consultation” process¹. SAC are keen to hold a full wider discussion with interested parties and a full and formal public consultation will be conducted later in the process (Stage 3C, scheduled for Autumn 2020) in line with the Gunning principles and standard Government guidance.

Purpose of the Airspace Change Proposal and estimate of future air traffic.

5. The purpose of the ACP is not to “open up” the airspace for military training because the airspace around Llanbedr is currently established as Class G airspace and as such is already open to (and used by) all types of aviation activity, including military training.
6. An ATZ is a standard safety measure that will protect all mixed-use aviation operations in the vicinity of Llanbedr Aerodrome.

¹ CAP1616 defines “consultation” as a formal process seeking input into a decision, undertaken in line with the Gunning principles and Government guidance, and “engagement” as 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.

7. The Runway Protection Zones (associated with the ATZ) prohibit anyone flying a drone in these areas without the permission of the Aerodrome Manager. Again, this is now a standard safety measure for all Licensed Aerodromes.
8. A Danger Area, (the subject of our current second ACP) is another standard safety measure and will only be enabled / activated for limited periods of time to support specific novel aerospace RDT&E activities.
9. Both an ATZ and Danger Area were previously in place at Llanbedr until 2004. Air traffic movements at Llanbedr in this period averaged approximately 9500 movements per year.
10. Air traffic at Llanbedr currently averages approximately 900 movements per year and the current projection is for between 4000 and 6000 movements per year - *i.e.* 42% to 63% of the 2004 baseline.
11. The ATZ ACP will protect and enhance the safety of the projected level of movements in line with the previous historic and established operations at the Aerodrome.
12. The ATZ ACP along with the DA ACP are the key air infrastructure requirements needed to underpin the long-term sustainable development of the Aerodrome.

Initial conclusions and recommendations from the engagement process.

13. SAC sent out questionnaires to over 160 different organisations and interested parties. The responses were consolidated for analytical consistency so as to consider a single response from each separate organisation. This results in a total of 50 independent responses, of which 29 (58%) are positive, 13 (26%) are neutral, and 8 (16%) are negative.
14. The engagement process was a valuable activity as it allowed SAC to refresh and widen relationships with local stakeholders and highlighted the key issues that will help shape the remainder of the Airspace Change Proposal.
15. The resulting airspace design will conform with the standard definition of an ATZ as detailed in Article 5 of the Air Navigation Order, 2016
16. Some respondents expressed a degree of concern about the possible environmental impact of the initial business opportunity associated with the ACP and this will be investigated further prior to the formal public consultation (Stage 3C) in order to provide more information for assessment.
17. In general, there appeared to be a significant majority acknowledgement (combined positive and neutral replies totalling 84% of respondents) that an acceptable solution can be found where appropriate mitigations could be implemented in terms of time of operation, duration of operation and location of operation (with regard to over water versus over land) to minimise any possible environmental impact.
18. SAC reflective of the feedback received will now be preparing an initial Operational Model associated with the use of the ATZ which will include hours of proposed operation, flight paths, noise levels etc all of which will form part of details to be made available within the formal public consultation process to follow later in the year.
19. SAC will ensure that all future direct written communication is provided in both English and Welsh languages.

Thank you again for your interest – we look forward to continuing this initial dialogue as the process moves forward. In the meantime, if you have any questions regarding this or any other element of the operation or development of the aerodrome, please do not hesitate to contact us.

For communication particular to this proposal please use the email: atz.acp@snowdoniaaerospace.com

The CAA portal address is: <https://airspacechange.caa.co.uk/> and use postcode: LL45 2PX