



**Snowdonia Aerospace Airspace Change Proposal  
Design Principles (Stage 1B), ACP-2020-02  
Llanbedr Aerodrome Traffic Zone (ATZ)**

## Document Details

Approval Level	Name	Authorisation
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Second reviewer and release authorisation		Chief Executive

Issue	Amendment Details	Date
1.0	First formal release incorporating analysis of the stakeholder engagement	29 <sup>th</sup> May 2020

## Executive Summary

**This report documents the “Stage 1B Design Principles” element of the Snowdonia Aerospace LLP submission for an Airspace Change Proposal, Reference: ACP-2020-02, Llanbedr Aerodrome Traffic Zone (ATZ), under the Civil Aviation Authority (CAA) CAP1616 Airspace Change Process.**

Snowdonia Aerospace LLP is continuing to progress and further develop a number of complementary business opportunities at Llanbedr Aerodrome relating to aerospace Research, Development, Test and Evaluation (RDT&E) and military aircraft training. To support these operations (and others) action is required to upgrade and formalise the current airspace around the Aerodrome as the present provision is insufficient to meet the identified future need and risks restricting opportunities that are in the strategic economic interest of the UK and Welsh governments and required to sustain long term employment in the region. Snowdonia Aerospace LLP (hereafter also referred to as the Change Sponsor) is therefore developing two Airspace Change Proposals (ACPs) to underpin these activities:

- ACP-2019-58, Llanbedr Danger Area (DA), which can be accessed online via: <https://airspacechange.caa.co.uk/PublicProposalArea?pID=193>
- ACP-2020-02, Llanbedr Aerodrome Traffic Zone (ATZ), which can be accessed online via: <https://airspacechange.caa.co.uk/PublicProposalArea?pID=211>

This document relates to the latter application, ACP-2020-02, that has been prompted by an opportunity for Llanbedr Aerodrome to be re-used by RAF Valley to support military aircraft training, particularly approach training for Hawk T2s of No.4 and 25 squadrons, thereby allowing fast and slow moving aircraft traffic to be separated in the vicinity of Valley itself and also providing a diversion in the event of poor weather. Whilst the initial opportunity relates to military air training, it should be noted that the ATZ is a standard safety measure that will protect all current and forecasted mixed-use aviation operations in the vicinity of Llanbedr Aerodrome.

The CAA Civil Aviation Publication CAP1616 defines a six-stage process through to implementation of a permanent airspace change, some of which have more than one step. This document addresses the requirements for Stage 1B: Design Principles.

The design principles encompass the safety, environmental and operational criteria and strategic policy objectives that the Change Sponsor aims for in developing the airspace change proposal. Key to the process is a two-way conversation with relevant stakeholders and interested parties that provides an opportunity to combine local context with technical, operational and safety considerations. The desired outcome is a shortlist of principles to inform the development of airspace design options and against which they can be qualitatively evaluated.

Snowdonia Aerospace (SAC) has undertaken a number of stakeholder engagement activities to help shape the ATZ design principles. In addition to a number of targeted stakeholder meetings, a questionnaire was also sent out to over 160 stakeholders and interested parties and 55 responses were received. The following primary conclusions have been made:

1. 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.
2. 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 (ACP);
3. The draft design principles have been reviewed and revised as part of the two-way engagement and the final statement is presented below in Section 5.2;

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4. The assumption (encapsulated in design principle #1) that the resulting airspace design will conform with the standard definition of an ATZ as detailed in Article 5 of the Air Navigation Order, 2016 remains unchanged;
5. There is a degree of concern about the possible environmental impact of the initial business opportunity associated with the ACP and further analysis is likely to be required prior to the formal public consultation (Stage 3C) in order to provide more information for assessment;
6. 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 and managed via Letters of Agreement with the local communities;
7. The Aerodrome Manual will need to be updated to reflect the change in airspace status and agreed operating procedures.

ID	Category	Design Principle
1	Technical	The design will conform to the standard definition of an ATZ to enhance the safety of operation at the aerodrome and will also include Runway Protection Zones to counter drone operators flying without permission
2	Safety	The design will not adversely affect the safety of operations at other nearby aerodromes
3	Safety / Operational	Operating hours of the Flight Information Service (FIS) and ATZ will be linked to ensure consistent traffic procedures and radio calls, and demand for changes in operating hours of the FIS will require a corresponding change in the operating hours of the ATZ and vice-versa
4	Environmental / Operational	Any impact on the environment should, where possible, be minimised via operating procedures and should, where possible, take account of any local development projects or noise sensitive areas that are highlighted as a result of stakeholder engagement
5	Environmental	The design should, where possible, allow approach and departure profiles to minimise environmental impact - e.g. lower-power continuous descents
6	Environmental	The design should, where possible, take account of local planning policy including that of the Snowdonia National Park Authority and the aerodrome registered Safeguarding Map
7	Operational	Impact on General Aviation (GA), gliding, microlight flying, hang gliding, paragliding or model flying should, where possible, be minimised via operating procedures

**Table 1** - Final technical, safety, environmental and operational design principles for ACP-2020-02, Llanbedr ATZ

It was noted there were a number of misapprehensions within the stakeholder community that have also been promoted within the local press, which SAC has sought to correct, namely:

1. The purpose of the ACP is not to “open up” the airspace for military training because the airspace is currently Class G and as such is already open to all types of aviation activity, including military training. It is emphasised that an ATZ is a standard safety measure that will protect all mixed-use aviation operations in the vicinity of Llanbedr Aerodrome and that it is unlikely that there will be any increase in the number of military aircraft sorties in Gwynedd/Anglesey (Ynys Môn) as a result of the proposed ACP;

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2. The ATZ is not intended to limit General Aviation activities, but rather to ensure the safety of all aviation operations in the vicinity of Llanbedr Aerodrome. Any potential impact on General Aviation can be minimised and managed via Letters of Agreement and updated Aerodrome operating procedures as previously noted;
3. The current two-way discussion was an initial “stakeholder engagement” intended to help shape the design principles and not a formal “public consultation” process<sup>1</sup>. There has been no intent on the part of SAC to limit discussion 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.

The following recommendations are also made for immediate follow-on activities:

1. SAC will write back to all respondents thanking them for their input to the stakeholder engagement and disseminating the results of the analysis;
2. SAC will ensure that all future direct written communication is provided in both English and Welsh languages.

<sup>1</sup> 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.

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# 1. Introduction

## 1.1. Background

Llanbedr Aerodrome (EGFD), Gwynedd (Figures 1a-1d), is sited on a coastal promontory at the northerly end of Cardigan Bay<sup>2</sup> with bi-directional over-water approaches to the 2000m+ main runway (17/35), which is at an elevation of 8m above mean sea level. There are two additional cross runways 05/23 and 15/33. Under upcoming aerodrome licensing proposals it is currently intended the runways will be 2,188m, 1,199 and 799m respectively. The local geography is predominantly coastal lowland and farmland within Snowdonia National Park that is bounded to the east by the Rhinog mountains, which rise to 756m at a distance of 9500m (approx.) from the main runway. The village of Llanbedr (population 645, 2011 census) is 2000m (approx.) to the north-east of the northern threshold and there's also a transitory population during summer months at the Shell Island campsite (approx. 1000m to the north-west of the main runway northern threshold) and the Dyffryn caravan park (approx. 500m to the south of the main runway southern threshold). The overall population density is consistent with that for Gwynedd as a whole - *i.e.* <50 people per square km<sup>3,4</sup>.



**Fig. 1a** - aerial view looking west



**Fig. 1b** - aerial view looking east



**Fig. 1c** - aerial view looking north



**Fig. 1d** - aerial view looking south

Llanbedr Airfield has a long history of research, development, test and evaluation (RDT&E) flying activities, particularly associated with the use of target drones, and also as a secondary/tertiary operating site for RAF Valley (EGOV, approx. 58km north/north-west). An Aerodrome Traffic Zone (ATZ)<sup>5</sup> and the original Danger Area D202 supported these activities prior to QinetiQ/MOD vacating the site in 2004, along with extant Danger Area D201, the closest edge of which is 25km (approx.) south-west of Llanbedr<sup>6</sup>.

<sup>2</sup> [View on Google Maps](#)

<sup>3</sup> Ref: [National Statistics Wales, June 2018](#)

<sup>4</sup> Ref: [Annual Lower Super Output Area \(LSOA\) Population Estimates, 2018](#)

<sup>5</sup> Aerodrome Traffic Zone (ATZ) as detailed in Article 5 of the Air Navigation Order, 2016, Ref: [Air Navigation Order, 2016](#)

<sup>6</sup> Ref: <https://www.aurora.nats.co.uk/htmlAIP/Publications/2018-08-02/html/eAIC/EG-eAIC-2018-087-Y-en-GB.html>

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The airfield currently supports an increasing mix of small (<20kg) and light (<150kg) drone RDT&E and General Aviation (GA) operations together with visiting military aircraft (fixed wing and rotary) and others including the search and rescue (SAR) helicopter from Caernarfon (EGCK, approx. 35km north/north-west), Police helicopter and Air Ambulance. The airspace is currently Class G. A local Flight Information Service (FIS) has been provided to support day-to-day operations and a Temporary Danger Area (Ref: QINETIQ/MS/AD/LET1404197, 15<sup>th</sup> September 2014) has previously been consulted on and implemented to support local aerospace RDT&E activities and provide a safe corridor to D201. There are GA aircraft operations most flyable days with an average of 100 to 200 movements per month. The airfield has also been designated as one of the candidate sites for a UK Spaceport by the Department for Transport (DFT) and Snowdonia Aerospace LLP has recently received a grant award from the UK Space Agency to develop a Horizontal Spaceport Development Feasibility Plan.

### 1.2. Opportunity to be addressed and Statement of Need

Snowdonia Aerospace LLP is continuing to progress and further develop a number of complementary business opportunities at Llanbedr Aerodrome relating to aerospace RDT&E and military aircraft training. To support these operations (and others) action is required to upgrade and formalise the current airspace around the Aerodrome as the present provision is insufficient to meet the identified future need and risks restricting opportunities that are in the strategic economic interest of the UK and Welsh governments and required to sustain long term employment in the region. Snowdonia Aerospace LLP (hereafter also referred to as the Change Sponsor) is therefore developing two Airspace Change Proposals (ACPs) to underpin these activities:

- ACP-2019-58, Llanbedr Danger Area (DA), which can be accessed online via: <https://airspacechange.caa.co.uk/PublicProposalArea?pID=193>
- ACP-2020-02, Llanbedr Aerodrome Traffic Zone (ATZ), which can be accessed online via: <https://airspacechange.caa.co.uk/PublicProposalArea?pID=211>

This document relates to the latter application, ACP-2020-02, that has been prompted by an opportunity for Llanbedr Aerodrome to be re-used by RAF Valley to support military aircraft training, particularly approach training for Hawk T2s of No.4 and 25 squadrons, thereby allowing fast and slow moving aircraft traffic to be separated in the vicinity of Valley itself and also providing a diversion in the event of poor weather. Whilst the initial opportunity relates to military air training, it should be noted that the ATZ is a standard safety measure that will protect all mixed-use aviation operations in the vicinity of Llanbedr Aerodrome. The Statement of Need for the application is declared as follows:

- *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.*

### 1.3. The cause of the opportunity and associated factors or requirements

Consolidation of UK military air training at RAF Valley has increased the need for supporting secondary/tertiary airfields to mitigate the potential aviation and programme schedule risks associated with the throughput of student pilots that might arise as a consequence of local air traffic congestion and/or poor weather. The combination of safety, operational, technical and environmental factors associated with mixing military air training with low volume aerospace RDT&E activities at Llanbedr is consistent with previous operations and was further validated during a successful detachment of Hawk T2s from Valley to Llanbedr during the Eisteddfod in August 2017.

The proposal does not form part of the Civil Aviation Authority (CAA) Airspace Modernisation Strategy (AMS)<sup>7</sup>, but it does not conflict with the plan in any way.

<sup>7</sup> Ref: <https://www.caa.co.uk/News/New-Airspace-Modernisation-Strategy-launched-to-overhaul-UK-airspace/>



## 2. Draft Design Principles

### 2.1. CAP1616 requirements and document scope

The CAA Civil Aviation Publication CAP1616<sup>8</sup> provides guidance on the regulatory process for changing the notified airspace design and planned and permanent redistribution of air traffic, and on providing airspace information.

CAP1616 defines a six-stage process through to implementation of a permanent airspace change, 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 (CAP1616, Para. 50). Furthermore, the CAA will consider requests from the Change Sponsor for additional scaling of the process when there is a good reason and it is proportionate to do so.

On the 23<sup>rd</sup> January 2020 the CAA Airspace Regulation team met with Snowdonia Aerospace LLP to discuss an appropriately scaled submission for ACP-2020-02, Llanbedr Aerodrome Traffic Zone. Subsequent to this meeting, the CAA determined that the simplified Aerodrome Traffic Zone (ATZ) Policy Statement, December 2019<sup>9</sup>, could not be applied due to the potential for increased traffic movements, but did agree to a scaled CAP1616 submission with a combined Define, Develop and Assess Gateway in June 2020. To meet this combined Gateway, Snowdonia Aerospace as the Change Sponsor is required to submit the following documents:

- Stage 1A: Assess Requirements - Statement of Need (previously submitted)
- Stage 1B: Design Principles;
- Stage 2A Options Development;
- Stage 2B Options Appraisal.

This document addresses the requirements for Stage 1B: Design Principles. The design principles encompass the safety, environmental and operational criteria and strategic policy objectives that the Change Sponsor aims for in developing the airspace change proposal. Key to the process is a two-way conversation with relevant stakeholders and interested parties that provides an opportunity to combine local context with technical, operational and safety considerations. The desired outcome is a shortlist of principles to inform the development of airspace design options and against which they can be qualitatively evaluated.

The remainder of this section describes the initial set of draft design principles for ACP-2020-02, Llanbedr Aerodrome Traffic Zone, as put forward by the Change Sponsor. Thereafter, Section 3 details the stakeholder engagement process, Section 4 summarises the stakeholder feedback and an analysis of the impact on the design principles, and Section 5 updates a definitive list of design principles and describes the next steps.

### 2.2. Initial statement of ACP-2020-02 Llanbedr ATZ design principles

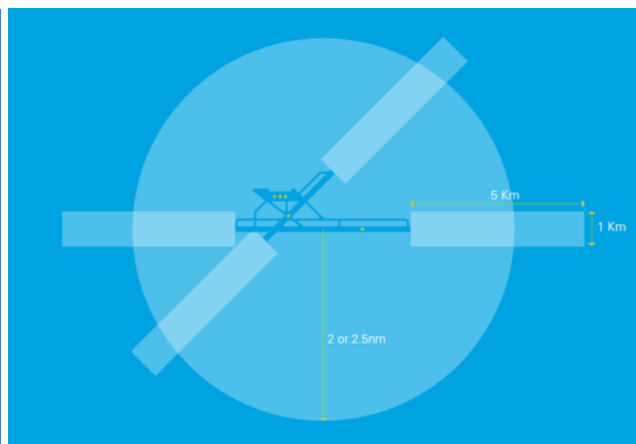
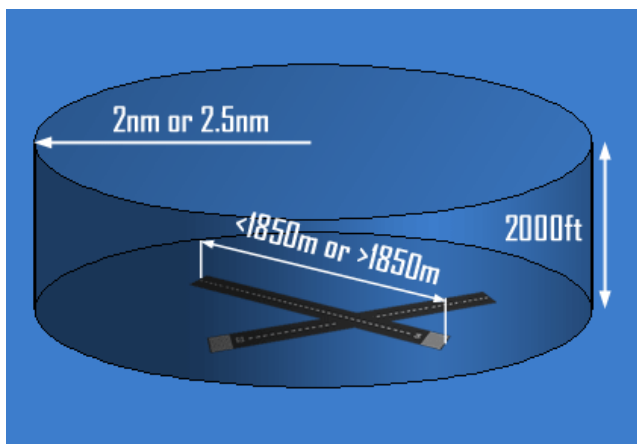
The purpose of CAP1616 is to avoid “solutionising” and to impose a structured process that delivers a considered and balanced airspace design and implementation. In this regard the design principles precede the development of design options, although following the previous Stage 1A discussion with CAA re. application of the ATZ Policy Statement versus CAP1616 there is an implicit assumption (not least in the title) that the resulting design will conform with the standard definition of an Aerodrome Traffic Zone (ATZ) as detailed in Article 5 of the Air Navigation Order, 2016<sup>5</sup>.

<sup>8</sup> Ref: [https://publicapps.caa.co.uk/docs/33/CAP1616\\_Airspace%20Change\\_Ed\\_3\\_Jan2020\\_interactive.pdf](https://publicapps.caa.co.uk/docs/33/CAP1616_Airspace%20Change_Ed_3_Jan2020_interactive.pdf)

<sup>9</sup> Ref: <http://publicapps.caa.co.uk/docs/33/PolicyStatementEstablishmentAndDimensionsOfATZs.pdf>

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The standard definition of an ATZ is illustrated in Figure 2 along with additional Runway Protection Zones (RPZ) that have been introduced by the CAA to counter drone operators flying without permission<sup>10</sup>. The combination of ATZ + RPZ is referred to as the Flight Restriction Zone (FRZ).



**Fig. 2a** - The Aerodrome Traffic Zone: A 2 or 2.5 nautical mile radius ‘cylinder’ around the aerodrome, extending 2000 ft above ground level, centred on the longest runway

**Fig. 2b** – Runway Protection Zones: A rectangle extending 5 kilometres from the threshold of the runway and 500m either side to a height of 2000 ft above ground level

In this context, the draft technical, safety, environmental and operational design principles for ACP-2020-02, Llanbedr ATZ, were defined as follows (Table 2):

ID	Category	Design Principle
1	Technical	The design will conform to the standard definition of an ATZ to enhance the safety of operation at the aerodrome
2	Safety	The design will not adversely affect the safety of operations at other nearby aerodromes
3	Environmental	Environmental impact (principally noise) should, where possible, be mitigated by management of the operating hours
4	Operational	Approach profiles should, where possible, be planned to avoid overflying local population and profiles should be varied to provide respite
5	Operational	Departure profiles should, where possible, be planned to avoid overflying local population and profiles should be varied to provide respite
6	Environmental	The design should, where possible, allow approach and departure profiles to minimise environmental impact - e.g. lower-power continuous descents
7	Safety	The design will not compromise the authority of a pilot to take action, pre-planned or otherwise, in the interest of safety
8	Safety	Operating hours of the FIS and ATZ will be linked to ensure consistent traffic procedures and radio calls
9	Operational	Demand for changes in operating hours of the FIS will require a corresponding change in the operating hours of the ATZ and vice-versa

<sup>10</sup> Ref: <https://www.caa.co.uk/Consumers/Unmanned-aircraft/Our-role/Airspace-restrictions-for-unmanned-aircraft-and-drones/>

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10	Environmental	The design should, where possible, take account of local planning policy including that of the Snowdonia National Park Authority and the aerodrome registered Safeguarding Map
11	Operational	Operating hours should, where possible, consider any day-or night-time constraints that are highlighted as a result of stakeholder engagement
12	Operational	The design and hours of operation should, where possible, seek to minimise impacts on General Aviation (GA)
13	Operational	The design and hours of operation should, where possible, seek to minimise impacts on gliding, microlight flying, hang gliding, paragliding or model flying
14	Environmental	The design and hours of operation should, where possible, take account of any local development projects or noise sensitive areas that are highlighted as a result of stakeholder engagement
15	Technical	The design and hours of operation should, where possible, consider any other issues that are highlighted as a result of stakeholder engagement
16	Technical	The design should include Runway Protection Zones in addition to the core Aerodrome Traffic Zone.

**Table 2** - Draft technical, safety, environmental and operational design principles for ACP-2020-02, Llanbedr ATZ

### 3. Engagement Process

#### 3.1. Strategy

The engagement strategy has been dictated very strongly by the impact of the Covid-19 pandemic, the need to avoid face-to-face meetings and to move all communication to email and video/phone conferencing. This introduced a slight hiatus in the immediate aftermath of the UK-wide lockdown on 23rd March 2020, but the breadth and scope of the engagement has not been unduly affected.

We adopted a two-stage engagement process, initially seeking the opinion of the two communities that are most likely to be impacted by the proposed airspace change, namely the current airspace user community directly associated with operations at RAF Valley and the residential and land owner community local to Llanbedr via Gwynedd County Council and local community councillors. The initial airspace user community engagement proceeded as planned via teleconference on 26th March 2020, but the local community engagement event that had been scheduled for 15th April 2020 had to be rearranged to 12th May via videoconference. A further video conference was also held with the local MP Liz Saville-Roberts along with other local councillors on 15th May 2020.

Stage two of the engagement process was to send out a questionnaire document via email to as wide a network of potential stakeholders and interested parties as possible. We drew up a list of additional stakeholders and interested parties based on our existing network of contacts, but also taking into account suggestions made by the user and local communities' representatives. Again, whilst noting that the ATZ is a standard safety measure that will protect all aviation operations in the vicinity of Llanbedr Aerodrome, SAC is very conscious that the initial business opportunity relates to military air training and that this may cause concern with some stakeholders. The questionnaire was therefore based on the draft design principles outlined in Section 2.2 but re-cast as questions with additional detail on the associated business opportunity in order to be as open as possible with the stakeholder community and to better solicit opinion. The questionnaires were distributed on 5th May with a requested return date of 18th May, although responses received after this date have still been considered. Due to a number of requests this return date was extended to the 22 May.

The stakeholder feedback and an analysis of the impact on the design principles is summarised in the next section, Section 4.

#### 3.2. List of stakeholders

The questionnaire was distributed to over 160 stakeholders and interested parties. The full list of stakeholders that have been party to the CAP1616 ACP-2020-02, Llanbedr ATZ Stage 1B engagement process is detailed at Appendix A.

#### 3.3. Stakeholder engagement questionnaire

The engagement questionnaire that was distributed to the above list of stakeholders is detailed at Appendix B.

#### 3.4. Engagement evidence

Minutes of all of the above referred to meetings and the completed questionnaires are provided separately as Annex 1.

#### 3.5. Engagement versus Consultation

The current stakeholder engagement will be augmented by a full public consultation later in the ACP process (Stage 3C). CAP1616 defines "engagement" and "consultation" thus:

- 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.

## 4. Stakeholder Feedback and Analysis of Design Principles

### 4.1. General

We received 55 responses to the stakeholder questionnaire, though in several cases (notably the RAF/MOD) a single response was made on behalf of multiple organisations and conversely in other cases multiple responses were made on behalf of a single organisation. Of the 55 responses, 29 were deemed to be positive toward the airspace change proposal, 14 were deemed to be neutral, and 12 were deemed to be negative.

Positive responses were received from all of the professional aviation organisations who replied - *i.e.* military, emergency services (police, fire, emergency medical, search and rescue), airports (Caernarfon, Warton, John Lennon/Liverpool, Airfield Operators Group), air traffic service providers (GATCO) and other commercial operators (Snowdonia Flying School, Snowdonia Sky Sports, Skydive Snowdonia and Whizzard Helicopters) - and also from local business and local community representatives. There was general acknowledgement of the value of an ATZ as an aviation safety mechanism and strong support for Llanbedr Aerodrome as an asset to the aviation community and the boost that it will provide to the local economy. Comments regarding specific design principles are discussed in Sections 4.2 to 4.5 below.

The neutral responses effectively fell into two categories, (i) local community representatives (including Snowdonia National Park Authority) who had environmental concerns and wished to have more time and/or more information to consider, and (ii) General Aviation representatives who were concerned about continued access to the airspace in the vicinity of Llanbedr Aerodrome. Comments regarding specific design principles were generally constructive and are discussed in Sections 4.2 to 4.5 below.

Of the negative responses, two were from the anti-war “Fellowship of Reconciliation in Wales” group, which had not been on the distribution list, and two further responses have no authentication in terms of affiliation but had email addresses and/or used language consistent with communication from the Fellowship of Reconciliation in Wales. Other negative responses had no direct relationship to the airspace change design principles per se but were based on (i) a misunderstanding that this was a public consultation and that insufficient time had been allowed, or (ii) that no Welsh-language version of the questionnaire had been provided. Both of these points will be clarified/rectified in immediate follow-up communication with the stakeholders and will also inform the public consultation strategy. Only two of the negative respondents (NFU Wales and the Snowdonia Society) had addressed specific (environmental) design principles and these are considered in more detail in Section 4.4 below. No outright “showstoppers” were identified.

For analytical consistency we believe it is appropriate to consolidate the responses 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.

### 4.2. Technical

ID	Category	Design Principle
1	Technical	The design will conform to the standard definition of an ATZ to enhance the safety of operation at the aerodrome
15	Technical	The design and hours of operation should, where possible, consider any other issues that are highlighted as a result of stakeholder engagement
16	Technical	The design should include Runway Protection Zones in addition to the core Aerodrome Traffic Zone.

**Table 3** - Draft technical design principles for ACP-2020-02, Llanbedr ATZ

There was only one response that suggested any alternative to the promulgation of a standard ATZ and that was from a local paragliding group who requested a “notch” be created in the airspace design to avoid their operating area on the dunes around Harlech. A scale drawing of the proposed ATZ at Llanbedr superimposed on a local map (Fig. 3a and 3b) shows that the very southern edge of the paragliding operating area (red dot) intersects the very northern edge of the ATZ with approximately 200 metres of overlap. The land in this immediate area is owned by the National Trust who only allow 36 paragliding launches per year and hence most operation is conducted further to the north. The RPZ may overlap the operating area, but this only applies restrictions on use of drones. It is therefore believed that operational and safety issues can be managed via Letters of Agreement and that no change to the technical design principles is warranted. It is further concluded that draft design principle #15 is redundant and that design principles #1 and #16 can be combined.



**Fig. 3a** - The proposed ATZ at Llanbedr superimposed on a 1:250,000 scale local map to show the full horizontal extent



**Fig. 3b** - The proposed ATZ + RPZ at Llanbedr superimposed on a 1:50,000 scale local map to show the full horizontal extent

Whilst not directly applicable to the design principles, one of the major misapprehensions in many of the negative responses was that the purpose of the Airspace Change Proposal is to “open up” the airspace for military training. It should be noted that the airspace is currently Class G and as such is already open to all types of aviation, including military training. It is emphasised again that an ATZ is a standard safety measure that will protect all aviation operations in the vicinity of Llanbedr Aerodrome and that furthermore there is unlikely to be any increase in the number of military aircraft sorties in Gwynedd/Anglesey (Ynys Môn) as a result of the proposed ACP.

**4.3. Safety**

ID	Category	Design Principle
2	Safety	The design will not adversely affect the safety of operations at other nearby aerodromes
7	Safety	The design will not compromise the authority of a pilot to take action, pre-planned or otherwise, in the interest of safety
8	Safety	Operating hours of the FIS and ATZ will be linked to ensure consistent traffic procedures and radio calls

**Table 4** - Draft safety design principles for ACP-2020-02, Llanbedr ATZ

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The RAF/MOD do not believe that #7 is an airspace design principle and as a result of the discussion SAC now concur with this assessment. SAC also recognises that the primacy of “Alpha” and “Rescue” callsigns for emergency operations will remain unchanged as a result of the proposed airspace change. Otherwise there was full agreement with design principles #2 and #8 and general acknowledgement of the value of an ATZ as a safety mechanism.

**4.4. Environmental**

ID	Category	Design Principle
3	Environmental	Environmental impact (principally noise) should, where possible, be mitigated by management of the operating hours
6	Environmental	The design should, where possible, allow approach and departure profiles to minimise environmental impact - e.g. lower-power continuous descents
10	Environmental	The design should, where possible, take account of local planning policy including that of the Snowdonia National Park Authority and the aerodrome registered Safeguarding Map
14	Environmental	The design and hours of operation should, where possible, take account of any local development projects or noise sensitive areas that are highlighted as a result of stakeholder engagement

**Table 5 - Draft environmental design principles for ACP-2020-02, Llanbedr ATZ**

With regard to design principles #3, #6 and #14, noise was unsurprisingly the primary factor of concern for all non-aviation respondents, with most wishing to have more time and/or more information to consider and a small minority objecting to all flying activity as a matter of principle. However, there were respondents who believed people would be prepared to accept any noise on the basis that the benefit to the local economy would outweigh any perceived nuisance.

The RAF/MOD did not comment on these design principles and do not provide data relating to their aircraft to support quantitative environmental assessment, however acknowledged that related operational issues could be managed via Letters of Agreement with the local community.

Through the local community discussions and the questionnaire, it was noted that:

- There is unlikely to be any increase in military aircraft sorties in Gwynedd/Anglesey (Ynys Môn) as a result of the proposed Llanbedr ATZ and that any operations conducted at Llanbedr will reduce any perceived impact to the local community around Valley and Mona;
- Anecdotal evidence (in terms of correspondence to the local MP) suggests that the noise associated with the Texan T Mk1 is considered more of a nuisance than that associated with the Hawk T2 (which is the primary RAF type currently identified for operations at Llanbedr);
- A qualitative measure of potential acceptability was provided by one local landowner who commented that “our clients are unlikely to be objectionable to the levels of noise experienced when the site operated prior to its closure in 2004 if in fact noise is the total extent of likely prejudice created by the outcome of this proposal - especially if the proposal genuinely creates local employ”;
- Night operations would be inconsistent with the “Dark Skies” designation for the area;
- Further analysis of the environmental impact will be required (at Stage 2B (initial options appraisal) and Stage 3A (full options appraisal) prior to public consultation (Stage 3C).

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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).

Design principles #3, #6 and #14 therefore persist (although #3 and #14 have a high degree of commonality and can be combined) and mitigating factors will be developed via operating procedures rather than via airspace design.

Design principle #10 was highlighted by the Snowdonia National Park Authority and Snowdonia Society and will persist, but SAC maintains the position that the ATZ represents a return to previous and established use and hence planning permission is not required in this case.

### 4.5. Operational

ID	Category	Design Principle
4	Operational	Approach profiles should, where possible, be planned to avoid overflying local population and profiles should, where possible, be varied to provide respite
5	Operational	Departure profiles should, where possible, be planned to avoid overflying local population and profiles should, where possible, be varied to provide respite
9	Operational	Demand for changes in operating hours of the FIS will require a corresponding change in the operating hours of the ATZ and vice-versa
11	Operational	Operating hours should, where possible, consider any day-or night-time constraints that are highlighted as a result of stakeholder engagement
12	Operational	The design and hours of operation should, where possible, seek to minimise impacts on General Aviation (GA)
13	Operational	The design and hours of operation should, where possible, seek to minimise impacts on gliding, microlight flying, hang gliding, paragliding or model flying

**Table 6** - Draft operational design principles for ACP-2020-02, Llanbedr ATZ

The RAF/MOD do not believe that #4 and #5 are airspace design principles and as a result of the discussion SAC now concur with this assessment, but the RAF/MOD did acknowledge that any related environmental issues could be managed via Letters of Agreement with the local community.

Draft design principle #9 is the operational equivalent of safety principle #8 and hence can be combined. Draft design principle #11 is the operational equivalent of environmental principles #3 and #14 and can also be combined. It is also considered that design principles #12 and #13 (and the corresponding responses from the stakeholder community) have a high degree of commonality and can be combined.

The General Aviation community strongly supported design principles #12 and #13, but were generally neutral in terms of overall support as they wished to have more time and/or more information to consider. The RAF/MOD did not comment on these design principles, but acknowledged that related operational issues could be managed via Letters of Agreement with the local community. SAC also acknowledge that Aerodrome operating procedures will need to be updated accordingly.



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A valuable by-product of the initial stakeholder engagement process is that it has allowed SAC to refresh and widen relationships with other nearby aviation operators, notably with the nearest airfield at Talybont/Peniarth, 11 nautical miles to the south of Llanbedr. Regardless of the ATZ, the increased communication will contribute to a general enhancement of air safety.

## 5. Conclusions

### 5.1. Conclusions and recommendations

Snowdonia Aerospace has undertaken a number of stakeholder engagement activities as part of the “Stage 1B Design Principles” element of the Airspace Change Proposal, Reference: ACP-2020-02, Llanbedr Aerodrome Traffic Zone (ATZ), under the Civil Aviation Authority (CAA) CAP1616 Airspace Change Process. In addition to targeted stakeholder meetings, a questionnaire was also sent out to over 160 stakeholders and interested parties and 55 responses were received. The following primary conclusions have been drawn:

1. 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.
2. 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 (ACP);
3. The draft design principles have been reviewed and revised as part of the two-way engagement and the final statement is presented below in Section 5.2;
4. The assumption (encapsulated in design principle #1) that the resulting airspace design will conform with the standard definition of an ATZ as detailed in Article 5 of the Air Navigation Order, 2016 remains unchanged;
5. There is a degree of concern about possible environmental impact of the business opportunity associated with the ACP and further analysis is likely to be required prior to the formal public consultation (Stage 3C) in order to provide more information for assessment;
6. 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 and managed via Letters of Agreement with the local communities;
7. The Aerodrome Manual will need to be updated to reflect the change in airspace status and agreed operating procedures.

It was further noted that there were a number of misapprehensions within the stakeholder community that have also been promoted within the local press, which SAC has sought to correct, namely:

1. The purpose of the ACP is not to “open up” the airspace for military training because the airspace is currently Class G and as such is already open to all types of aviation activity, including military training. It is emphasised that an ATZ is a standard safety measure that will protect all mixed-use aviation operations in the vicinity of Llanbedr Aerodrome and that there is unlikely to be any increase in the number of military aircraft sorties in Gwynedd/Anglesey (Ynys Môn) as a result of the proposed ACP;
2. The ATZ is not intended to limit General Aviation activities, but rather to ensure the safety of all aviation operations in the vicinity of Llanbedr Aerodrome. Any potential impact on General Aviation may be minimised and managed via Letters of Agreement and updated Aerodrome operating procedures as previously noted;
3. The current two-way discussion was an initial “stakeholder engagement” intended to help shape the design principles and not a formal “public consultation” process. There has been no intent on the part of SAC to limit discussion 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.

The following recommendations are also made for immediate follow-on activities:

1. SAC will write back to all respondents thanking them for their input to the stakeholder engagement and disseminating the results of the analysis;
2. SAC will ensure that all future direct written communication is provided in both English and Welsh languages.

**5.2. Final statement of ACP-2020-02 Llanbedr ATZ Design Principles**

Based upon the responses to the stakeholder engagement questionnaire and associated discussions and analysis presented in Section 4, the final technical, safety, environmental and operational design principles for ACP-2020-02, Llanbedr ATZ have been defined as follows:

ID	Category	Design Principle
1	Technical	The design will conform to the standard definition of an ATZ to enhance the safety of operation at the aerodrome and will also include Runway Protection Zones to counter drone operators flying without permission
2	Safety	The design will not adversely affect the safety of operations at other nearby aerodromes
3	Safety / Operational	Operating hours of the FIS and ATZ will be linked to ensure consistent traffic procedures and radio calls, and demand for changes in operating hours of the FIS will require a corresponding change in the operating hours of the ATZ and vice-versa
4	Environmental / Operational	Impact on the environment should, where possible, be minimised via operating procedures and should, where possible, take account of any local development projects or noise sensitive areas that are highlighted as a result of stakeholder engagement
5	Environmental	The design should, where possible, allow approach and departure profiles to minimise environmental impact - e.g. lower-power continuous descents
6	Environmental	The design should, where possible, take account of local planning policy including that of the Snowdonia National Park Authority and the aerodrome registered Safeguarding Map
7	Operational	Impact on General Aviation (GA), gliding, microlight flying, hang gliding, paragliding or model flying should, where possible, be minimised via operating procedures

**Table 7 - Final technical, safety, environmental and operational design principles for ACP-2020-02, Llanbedr ATZ**

**5.3. Next steps**

The design principles stated in Table 7 will be used to help generate the Design Options (Stage 2A) and inform the Design Options Appraisal (Stage 2B). More generally, the conclusions and recommendations will also be used to help inform the Consultation Preparation (Stage 3A).

## Appendix A - List of stakeholders

The following list of stakeholders have been party to the CAP1616, ACP-2020-02, Llanbedr ATZ Stage 1B engagement process, and have received the engagement questionnaire detailed in Appendix B.

Organisation / Party	Representative
Aerospace Wales	
Airborne Solutions Ltd.	
Airbus / Serco	
Airlines UK	
Airspace4all	
Airport Operators Association (AOA)	
Airfield Operators Group (AOG)	
Aircraft Owners and Pilots Association (AOPA)	
Airspace Change Organising Group (ACOG)	
Air-11GPBM-ATM Safeguarding SO3	
Air-11GPBM-DAAM & Assurance SO1	
Air-11GPBM-DAAM & Ranges S03	
Argoed Farm	
Ascent	
Association of Remotely Piloted Aircraft Systems UK (ARPAS-UK)	
NATS Aberporth	
Aviation Environment Federation (AEF)	
British Airways (BA)	
Babcock MSC (Onshore)	

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BAE Systems Warton	
Barmouth Community Council	
Bristow	
British Airline Pilots Association (BALPA)	
British Balloon and Airship Club	
British Business and General Aviation Association (BBGA)	
British Gliding Association (BGA)	
British Helicopter Association (BHA)	
British Hand Gliding and Paragliding Association (BHPA)	
British Microlight Aircraft Association (BMAA) / General Aviation Safety Council (GASCO)	
British Model Flying Association (BMFA)	
British Skydiving	
Drone Major	
Cadw	
Caernarfon Airport	
Campaign for The Protection of Rural Wales	
Castle Air	
Cloudbasepro	

**COMMERCIAL-IN-CONFIDENCE**

Country Land & Business Association Wales	
DAATM-Airspace Ops S02	
Denbigh Gliding	
DES Wpns Eng-Hd	
DES Wpns Test-Omwpsns-Air Ranges	
Dyffryn Ardudwy Community Council	
Eastern Airways	
Electroflight	
Faelere Farm	
Farmers Union of Wales	
General Aviation Alliance (GAA)	
Guild of Air Traffic Control Officers (GATCO)	
Gwynedd County Council	
Harlech Community Council	
Hawarden	
Heavy Airlines	
Helicopter Club of Great Britain (HCGB)	
Hen-Dy Farm	
Hereford Gliding	
Honourable Company of Air Pilots (HCAP)	

**COMMERCIAL-IN-CONFIDENCE**

Iprosurv	
Isle of Man CAA	
Light Aircraft Association (LAA)	
Liverpool John Lennon Airport	
Llanbedr Community Council	
Llanfair Community Council	
London Sailplanes	
Low Fair Airlines	
Maes Y Garnedd	
Maritime Coastguard Agency (MCA)	
Midlands Gliding Club	
Military Aviation Authority (MAA)	
Ministry of Defence - Defence Airspace and Air Traffic Management (MOD DAATM)	
National Farmers Union Cymru	
National Police Air Services	
National Trust	
NATS	
Natural Resources Wales	
Navy Command HQ	
North Wales Air Ambulance	

**COMMERCIAL-IN-CONFIDENCE**

North Wales Economic Ambition Board	
North Wales Fire & Rescue	
North Wales Police	
North Wales Resilience Forum	
North Wales Tourism Board	
Pembrey Airport	
Pdg Helicopters	
PPL/IR (Europe)	
QinetiQ	
Rolls Royce	
Royal Aero Club	
Shell Island	
SHY-ATC CTRL 06	
SHY-OPS SFSO	



**COMMERCIAL-IN-CONFIDENCE**

SHY-SATCO	
Snowdonia Enterprise Zone	
Snowdonia Flight School	
Snowdonia National Park Authority	
Swanwick	
SWK-OC 2 Ops	
Talsarnau Community Council	
Talybont Airfield	
Talybont Community Council	
Trent Valley Gliding Club	
UK Airprox Board (UKAB)	
UK Flight Safety Committee (UKFSC)	
United States Air Force Europe (3rd Air Force-Directorate of Flying (USAFE (3rd AF-DOF))	
VAL-OPS WG ATCO 4	
VAL-OPS WG ATCO 2	
VAL-OPS WG OC	
VAL-OPS WG STANAT OC	
VAL-OPS WG T2 STANAT	
VAL-OPS WG T6 STANAT	
VAL-OPS WG SFSO	
Visit Wales	

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Welsh Government	
Welsh Office	
Welshpool Airport	
West Wales Airport	
Whizzard Helicopters	
Ystimgwern Farm	
22 Group	
22TRG GP-FT SO2 AS	
22TRG GP-FT FJ SO2	
72 SQN-OC C FLT	

## Appendix B - Stakeholder questionnaire

The following questionnaire relating to the CAP1616, ACP-2020-02, Llanbedr ATZ Stage 1B engagement process, was based on the draft design principles outlined in Section 2.2 but re-cast as questions with additional detail in order to better solicit opinion. The questionnaires were distributed to the stakeholders listed in Appendix A.

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

5th May 2020

**Initial Engagement Letter. Response deadline 18th May 2020 (Subsequently extended to 22 May 2020)**

To: All stakeholders and interested parties.

Why are you being contacted?

This document refers to a proposed change of airspace use, surrounding Llanbedr Airfield, the principle purpose of which is to enable RAF Valley to conduct flight training. We are contacting you in order to seek your feedback so as to inform the future Airspace Change Proposal (ACP).

#### Does this concern me?

If you represent people who fly in North Wales, and, or, organisations that are concerned with North Wales, or you are an individual for whom this proposal may have implications, then you will want to understand this application. We appreciate time is short in order to gather a consensus so we would urge that this email communication is forwarded to anyone in your organisation that may be interested. They can respond through you or directly to us as an individual. Please note that this is an initial engagement to help shape the design and that further comment will be possible as part of a formal public consultation later in the year.

#### Introduction to this ACP

All Airspace Change (ACP) proposals in the U.K. are now conducted under a process enshrined in a document called CAP1616 produced by the Civil Aviation Authority (CAA). The entire process is mapped on line and all airspace change proposals can be seen at <https://airspacechange.caa.co.uk/> To see proposed changes in relation to Llanbedr Airfield simply go to this link and type in the postcode LL45 2PX. This letter refers to an Air Traffic Zone as referenced above and this is one of two proposals. It is required that the two proposals are dealt with entirely separately. Later this month we will send an Engagement Letter in relation to a second ACP which is for a Danger Area. The information associated with this second application can be seen under reference ACP-2019-58, on-line.

This letter will:

Inform you of the scope of the proposed change ACP-2020-02, which is to introduce an Air Traffic Zone at Llanbedr Airfield.

Inform you of the perceived requirement for change.

Seek your feedback especially in relation to the design principles and the design options for this proposal.

#### Where are we?

We, that is Snowdonia Aerospace LLP (SA) who are known as the Change Sponsor (CS), are at the start of a process that is scheduled to complete in August 2021. However, it is very important to understand that this is your opportunity to make an early contribution which could influence the design principals and the outcome of the design options in relation to this proposal. To participate at this stage, we must have feedback returned to us by the deadline highlighted above in red – Monday

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18th May 2020. Before that date we will respond to questions sent to the dedicated email address provided below. There will be a further opportunity to comment in the Consultation Stage which will start later this year.

We are currently at Stage 1B Design Principles. Stage 1A Assess Requirements, has been completed and minutes of various meetings and records of documents submitted have been uploaded to the aforementioned <https://airspacechange.caa.co.uk/> under the quoted reference.

### Impact of Coronavirus

SA determined, given the CAA capability to work from home and use telephone conferencing, that it was quite possible that the agreed timeline identified for this ACP to progress might not be affected from this perspective. SA are likewise unaffected in our ability to engage in internal meetings and progress matters.

Having lost the opportunity to engage with the community on 15th April 2020 and with a great deal of uncertainty at that point for all of us about health and welfare of family and friends, we determined that we would engage with stakeholders and interested parties at this stage by email, and seek email responses and exchanges via this method.

### What is an ATZ?

An ATZ is described and defined for a variety of circumstances in a CAA Policy document published by the Safety and Airspace Regulation Group on 19th December 2019. In terms of the relevant space this would encompass at Llanbedr Airfield the following paragraph extract from that document is applicable:

f) The aerodrome traffic zone is the airspace extending from the surface to a height of 2000 feet above the level of the aerodrome within the area bounded by a circle centred on the notified midpoint of the longest runway and having a radius of 2½ nautical miles.

The Policy document includes the relatively simple and straightforward application process for the implementation of a new ATZ.

However, the purpose of an ATZ is defined elsewhere as follows: The ATZ is intended to protect the aerodrome traffic, i.e. the traffic on the manoeuvring area and the traffic in the immediate vicinity of an aerodrome. This includes, but is not limited to, the aircraft in the aerodrome traffic circuit.

The CAA have determined that this description refers to existing traffic at an aerodrome and this proposal is to protect a potential increase in aerodrome traffic. Accordingly, they have said this application must follow the CAP 1616 process in full at Level 1.

### Design Principles

Normally in the full 1616 process this stage of looking at design principles would influence the eventual outcome of the type of airspace, its shape and area, however this application is unusual from that respect in that the airspace required is for a specific purpose as described above, i.e. as an ATZ. And, for that purpose there is already an internationally agreed 'design'.

However, the design principles in relation to the introduction of airspace are also concerned with geography, population distribution, environmental considerations and economic considerations, consequently there is an opportunity to provide local context with technical considerations when considering the design principles.

The operational aim of the proposal.

The principle aim is to satisfy a need for RAF Valley to utilise Llanbedr Airfield for flight training and this is described further in the Statement of Need which can be seen at <https://airspacechange.caa.co.uk/> under the quoted reference.

### Safety constraints or opportunities

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RAF Valley, due to their own operational safety constraints require the existence of an ATZ at Llanbedr Airfield in order for them to conducting training at the Airfield.

In addition, RAF Valley require Llanbedr Airfield to become a CAA Licensed Aerodrome with a minimum of an air traffic Flight Information Service and a CAT 3 RFFS (Fire cover). The Flight Information Service (FIS) is now available as Snowdonia Aerospace achieved CAA approval of its own Air Navigation Service Provider (ANSP) operation on 19th March 2020. Work on achieving the licensing requirement is well under way.

This is a tremendous opportunity to greatly advance the operational capability at Llanbedr Airfield and secure long-term jobs. In so doing there is safety benefit opportunity for all users of the aerodrome brought about by developing the professional operations team and including the provision of the FIS on a regular basis. The latter will bring a safety opportunity, or benefit, for transiting General Aviation (GA) traffic.

An ATZ with its associated safety implications was previously in existence at the Airfield prior to the sale of the Airfield by the Ministry of Defence. This was subsequently disestablished pending a requirement for a new ATZ for a new operator.

### **Operational constraints or opportunities**

The length of the main runway at Llanbedr Airfield provides the operational opportunity to the use by the RAF of Hawk T2 or Texan aircraft. The benefits of flying at Llanbedr Airfield with circuits to the west over the sea is well known due to the consistent historic use for 50 plus years until the Ministry of Defence sold the airfield in 2004.

The proposed operational use with a Flight Information Service and CAT 3 RFFS will restrict operational use by RAF Valley to military singleton aircraft operations. It will not so constrain GA.

Technical constraints or opportunities.

There are no known technical constraints to the introduction of the ATZ. An RAF Contract will ensure the re-introduction of Meteorological equipment to enable aviation weather information known as METAR and TAF to be produced. This will enable RAF Valley to have the assurance of weather at Llanbedr and provide a service to the wider aviation community.

### **Economic constraints or opportunities**

A Contract with the RAF will enable SA to further develop and improve the operational support and long -term sustainability of the Airfield thereby enhancing the capability of the aerodrome for other aviation users, increasing economic activity and job creation.

The policy regulatory framework with which the proposal must comply.

SA are following the process described in detail in CAP1616. As part of this we are engaging with potential stakeholders and interested parties to seek their views and comments on the proposed Design Principles to be employed in the development of design options for an Air Traffic Zone at Llanbedr Airfield.

Stakeholders engaged include but are not limited to: RAF Valley, DAATM, QinetiQ, local councils and communities, General Aviation including based GA aircraft owner/operators, regular or previous users, NATMAC and National Air Traffic Services (NATS), local landowners, statutory bodies and parties having an interest in the region.

### **Engagement**

The first meeting to set the scene for the engagement process was a bilateral meeting set up on 26th March 2020 with RAF Valley but because of Coronavirus this was held by telephone conference call. The redacted minutes of this meeting, approved by participants, will be uploaded to <https://airspacechange.caa.co.uk/> under the quoted reference as required along with the feedback from this further engagement by email.

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Specific engagement meetings were set up with the local councils' liaison groups, which included local councils and community representatives, the Welsh Government, Snowdonia Enterprise Zone Board and other members of the Llanbedr Oversight Board, for the 15th April 2020. These meetings had to be cancelled due to Coronavirus.

A list of all those sent this communication has been compiled at Appendix A to this letter.

Presentations and displays used in the CAP1616 process to date are available to view at <https://airspacechange.caa.co.uk/> under the quoted reference. These should assist all stakeholders and interested parties in understanding more fully the context of this ACP and thereby contribute to the development of the proposed Design Principles now being considered.

To enable maximum engagement at this difficult time we have set up a dedicated email response address [atz.acp@snowdoniaaerospace.com](mailto:atz.acp@snowdoniaaerospace.com) which will be used throughout the CAP 1616 process.

**Development of Design Principles (DPs)**

CAP 1616 guidance explains that it is important for the DPs to be drawn up through engagement between the CS and affected stakeholders and interested parties at this early stage in the process, and that unanimous agreement on the principles may be unlikely.

SA have drawn up a list of sixteen proposed design principles for comment upon in the below Questionnaire. In many cases stakeholders and interested parties are likely to be concerned about the airspace design itself but in this case an ATZ size, shape and volume is already defined in the Policy document referenced earlier. Non the less you should feel free to make comment and also suggest any other principle you think should be incorporated as part of the design principles now being considered. According to your feedback the DPs will be prioritised as to which is felt to be most important and a final list of DPs will be utilized in examination of the Design Option.

**Your Responses**

The questions in the Questionnaire below are designed to help us understand any constraints that could be considered during the CAA CAP 1616 Design Principles step of the Define Stage, Design Principles (1B). Please insert your responses below to each of the following questions. Where additional sheets or documents are used please make it clear which specific questions the additional sheets are responding to. ALL documents are to be returned to: [atz.acp@snowdoniaaerospace.com](mailto:atz.acp@snowdoniaaerospace.com) as previously described. The first 10 questions give an option to agree or disagree. If you agree or disagree it would be helpful to have additional supporting comments to this. If any of the questions are not applicable or relevant, please say so against the appropriate question in the comment box. Please just copy the completed questionnaire pages to send, with any additional supplementary response.

**QUESTIONNAIRE IN RELATION TO:**

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

Representative Organisation:

(Please insert details of the Organisation you are replying on behalf of)

1. The establishment of an ATZ, is appropriate due to the increased traffic envisaged and will enhance the safety of operation of the airfield.		
Your response:	Agree	Disagree
Other comment:		

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2. The design in Class G airspace does not adversely affect safety of operations at other nearby aerodromes.		
Your response:	Agree	Disagree
Other comment:		
3. The design will bring increased levels of air traffic to Llanbedr and therefore potentially increased levels of noise. The CS proposes to normally operate the FIS 9a.m. to 6 p.m. Monday to Friday and within that period restrict RAF Valley operations to a number of hours per day on a moveable basis.		
Your response:	Agree	Disagree
Other comment:		
4. RAF Valley Arrivals. RAF Valley will plan flight profiles in order that aircraft will mostly arrive from the west, south west or north west avoiding overflying local population. Profiles will be varied to provide respite. The design should regularise approach paths onto predetermined published routes to bring certainty to local residents and airspace users.		
Your response:	Agree	Disagree
Other comment:		
5. RAF Valley Departures. RAF Valley will plan flight profiles, in that aircraft will depart from either runway generally to the west but regardless normally maintain headings between 170° and 350° in a westerly direction.		
Your response	Agree	Disagree
Other comment:		

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6. The design should help ensure aircrew can plan their arrival using defined routes laterally and vertically, so permitting lower-power continuous descents, thus reducing noise and emissions. Power required on departure will be commensurate to task, but pilots should again moderate application of power close to the coastal population if possible to minimise noise and emissions.

Your response:	Agree	Disagree
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Other comment:

7. It is understood that information promulgated by the CS will never compromise the authority of a pilot to take action, pre-planned, or otherwise to alter heading, speed or height in the interest of safety.

Your response	Agree	Disagree
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Other comment:

8. While the ATZ is intended to be implemented principally to accommodate RAF Valley in their weekday operational hours, the ATZ and the FIS are linked and if the FIS was implemented for a special purpose out of normal hours, or at the weekend, the ATZ would be in place during that time of additional service provision. This is to help ensure normal traffic procedures and normal radio calls are made at the right time and in the right place in the interest of air safety.

Your response	Agree	Disagree
---------------	-------	----------

Other comment:

9. In relation to '8' above in relation to future proofing. Were GA traffic to increase to the extent that a FIS were provided regularly at weekends the ATZ would apply. Likewise, if RAF traffic during the week diminished the ATZ would still apply until such time as the airspace was judged to be unnecessary and a formal process agreed to disestablish it.

Your response	Agree	Disagree
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Other comment



10. The design should take account of local planning policy including that of the Snowdonia National Park Authority and the aerodrome registered Safeguarding Map would make any applicant for development aware of flight paths.		
Your response	Agree	Disagree
Other comment		
11. Please let us know if there are any daytime or nighttime constraints that you consider the CS could take into account when making this application.		
Your response		
12. Please provide any details of any issues or constraints due to local General Aviation Operations that you believe may have an impact on a new ATZ design.		
Your response		
13. Please provide details of any constraints the introduction of this design may have on gliding, microlight flying, hang gliding, paragliding or model flying.		
Your response		

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14. Are there any local development projects, or existing particularly noise sensitive areas, that the CS should be aware of?

Your response

15. Please advise us of any other issues or constraints you feel the CS could consider when designing its new airspace.

Your response please provide details.

16. To justify the completion of this ACP the traffic from RAF Valley will have to be confirmed and the aerodrome then licensed. Will the introduction of a Flight Restricted Zone (FRZ), which would be applied automatically when the ATZ is approved, cause any issue or constraint? See note below.

Your response

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The Flight Restriction Zone consists of the following three elements:

- The Aerodrome Traffic Zone: A 2 or 2.5 nautical mile radius 'cylinder' around the aerodrome, extending 2000 ft above ground level, centered on the longest runway.
- Runway Protection Zones: A rectangle extending 5Km from the threshold of the runway away from the aerodrome, along the extended runway centreline, and 500m either side- also to a height of 2000 ft above ground level.

Thank you for your cooperation in completing this questionnaire. Your comments will provide a valuable input to aid development of the Design Principles against which the options for the ATZ airspace design can be developed.

All completed forms have to be kept to evidence the CS engagement with stakeholders and interested parties but this information remains confidential.

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