



[REDACTED]  
[REDACTED]  
[REDACTED]

20<sup>th</sup> July 2020

Dear [REDACTED]

**AIRSPACE CHANGE PROPOSAL ACP-2019-58 LLANBEDR AERODROME DANGER AREA – SUMMARY OF DESIGN OPTIONS AND INITIAL APPRAISAL**

We will be writing to all stakeholders to thank them for the engagement to date on our Airspace Change Proposal, ACP-2019-58, Llanbedr Aerodrome Danger Area, but further to our email exchange as part of this process, we also wanted to take this opportunity to write to you directly to address the specific issues that you raised in more detail and to assure you that we have taken your concerns into account in developing our proposal.

Firstly, we'd like to recap how the recent engagement fits into the overall Civil Aviation Authority (CAA) CAP161 Airspace Change Process (ACP). We have now completed the development of the design principles and design options under Stages 1 and 2, respectively, and submitted these documents to the CAA for a combined Stage 1 and 2 Gateway Review on 31<sup>st</sup> July. This will be followed by Stage 3, a full and formal public consultation during Autumn 2020 that will be undertaken in line with the Gunning principles and Government guidance. This may result in a further refinement of the design at Stage 4 before submission to the CAA for a final decision (Stage 5). Implementation at Stage 6 is currently anticipated in Summer 2021 and a final review at Stage 7 will be conducted 12 months later.

The current status of the Llanbedr Danger Area ACP and all of the formal documentation that has been submitted to support the proposal can be accessed via the CAA's online portal:

<https://airspacechange.caa.co.uk/PublicProposalArea?pID=193>

With regard the current position, the size of both Danger Area (DA) options (Figures 1 and 2) is needed to accommodate the flight test requirements of a range of different novel aerospace systems and the shape has been designed to be simple to interpret and implement. This means that whilst specific geographic locations may nominally sit within the DA, operating procedures will be put in place to ensure any drone/novel aerospace flying activities are kept clear of sensitive areas – e.g. the town of Harlech, established flying around Harlech cliffs and Harlech Merthyr Farm *etc.* It should also be noted that the Temporary Danger Area (effectively Design Option #1) has been activated on a number of occasions over the past 5 years without incident, concern or impact on local aviation or non-aviation activities. This has been achieved by constraining flying operations to the west of the railway line, but this may be overly limiting in future

We have made a forecast of future business and anticipate that we will need to activate the Danger Area on approximately 100 days per year, but that the vast majority of operations (approximately 90%) will be over the aerodrome or out over the sea. We therefore believe there is a great deal of scope for novel aerospace activities within the Llanbedr Danger Area and the hang-gliding and paragliding [REDACTED] to safely co-exist without impact on either party.

Furthermore, a Danger Area is only one element of a multi-faceted Operating Safety Case (OSC) that any drone operator will need to submit to the CAA for approval before any flight within the DA will be allowed.

The OSC will describe where, when and how the drone will operate and will be expected to show that all built-up/sensitive areas will be avoided and that appropriate geo-fencing mechanisms are built into the autopilot to ensure that not only is this achieved, but that the drone will be constrained within the DA at all times. The drone will also be expected to have a geolocation transponder that will allow the drone operator, the Llanbedr Aerodrome Flight Information Service (FIS) Officer and any other suitably equipped air traffic to know where the drone is at all times.

We hope that the combination of limited over-land drone operations (less than 10 days a year), operating procedures, geo-fencing and CAA approval of the safety case will assuage the concerns you have about the potential impact on [REDACTED]. We wish to remain good neighbours and are very happy to continue this dialogue through to a mutually acceptable conclusion that we can enshrine in a Letter of Agreement (LOA).

Yours sincerely

[REDACTED]

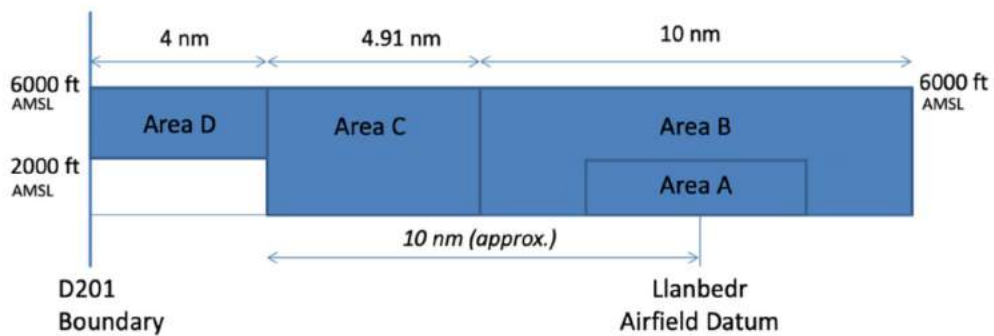
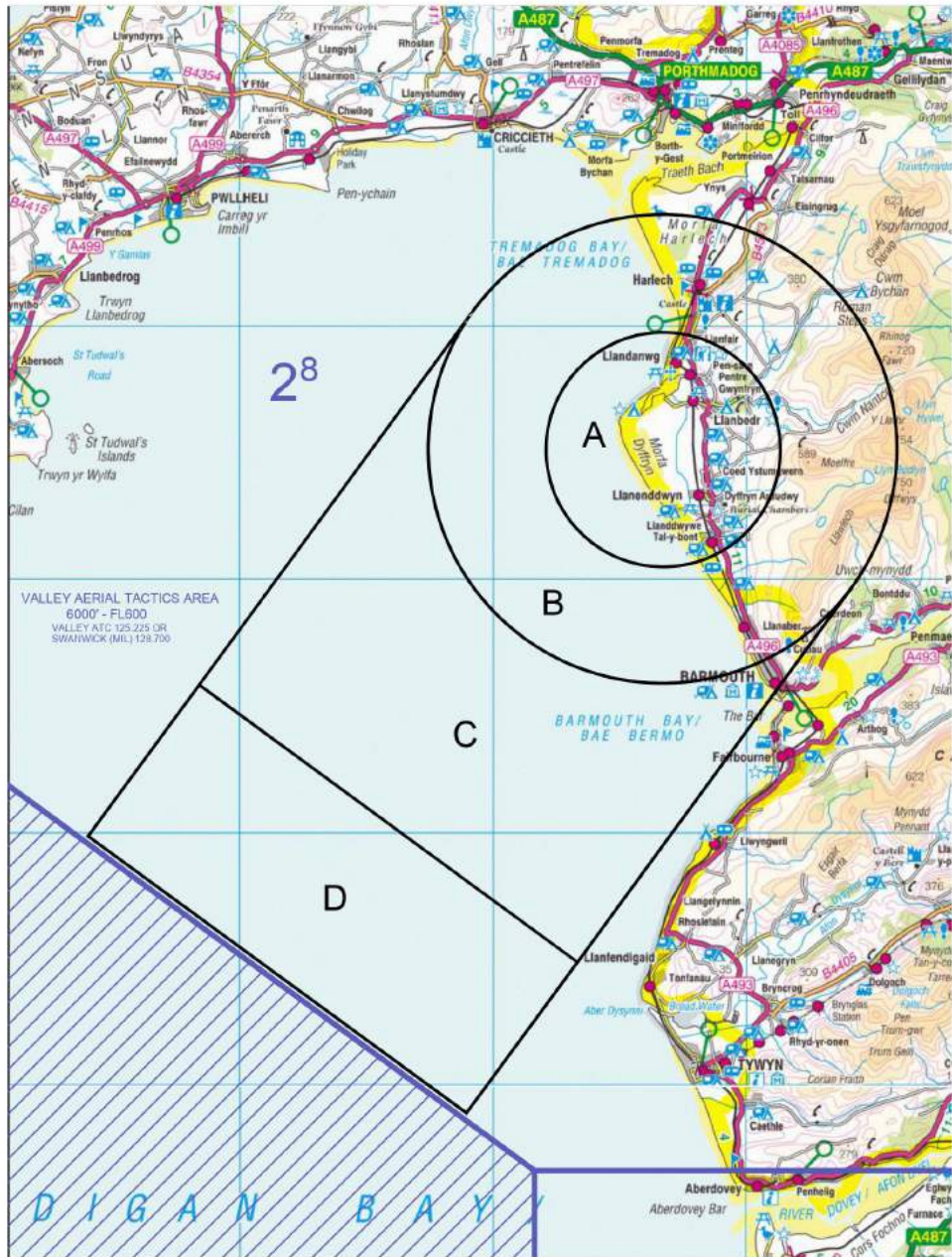


Figure 1 – Draft airspace design Option #1 for ACP-2019-58, Llanbedr Danger Area (DA)

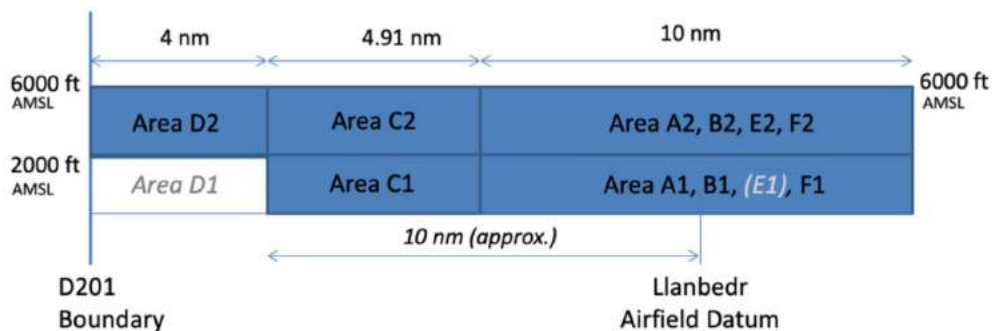
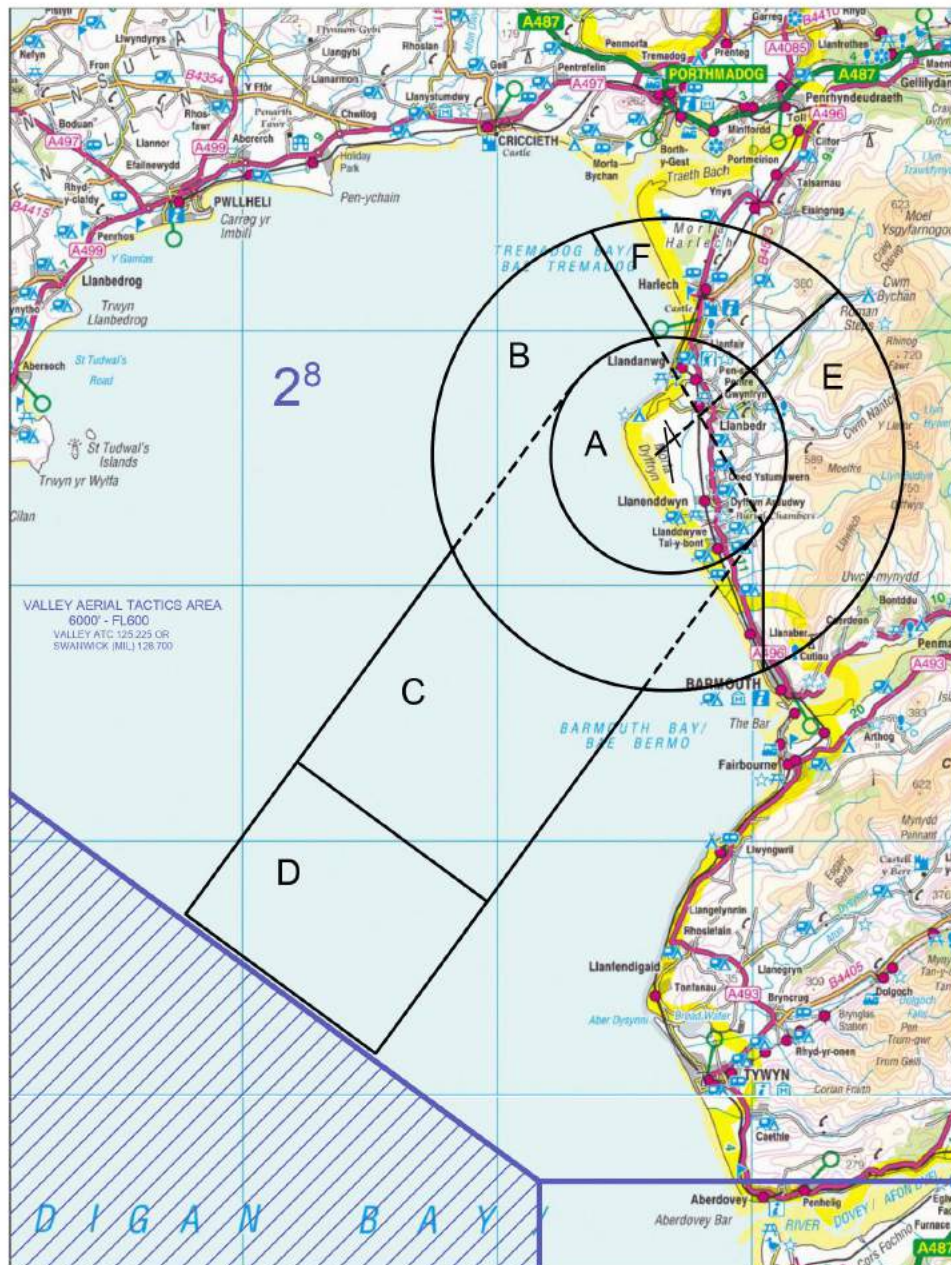


Figure 2 – Draft airspace design Option #2 for ACP-2019-58, Llanbedr Danger Area (DA)