[redacted]

20th 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 31st 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.* [redacted] *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 and the vehicle size (the majority less than 150kg) and propulsion type (50%+ electric) mean that any noise and environmental impact is expected to be negligible.

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[1] 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), low noise footprint, 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]

1 A Flight Information Service (FIS) is a form of air traffic service that is provided at airfields where, despite not being busy enough for full air traffic control, the traffic is such that some form of service is necessary. The FIS provides aircraft and drone pilots with details of other known traffic taking off, landing and flying in the vicinity of the airfield. It is defined as information pertinent to the safe and efficient conduct of flight, and includes information on other potentially conflicting traffic, but stopping short of providing positive separation from that traffic.

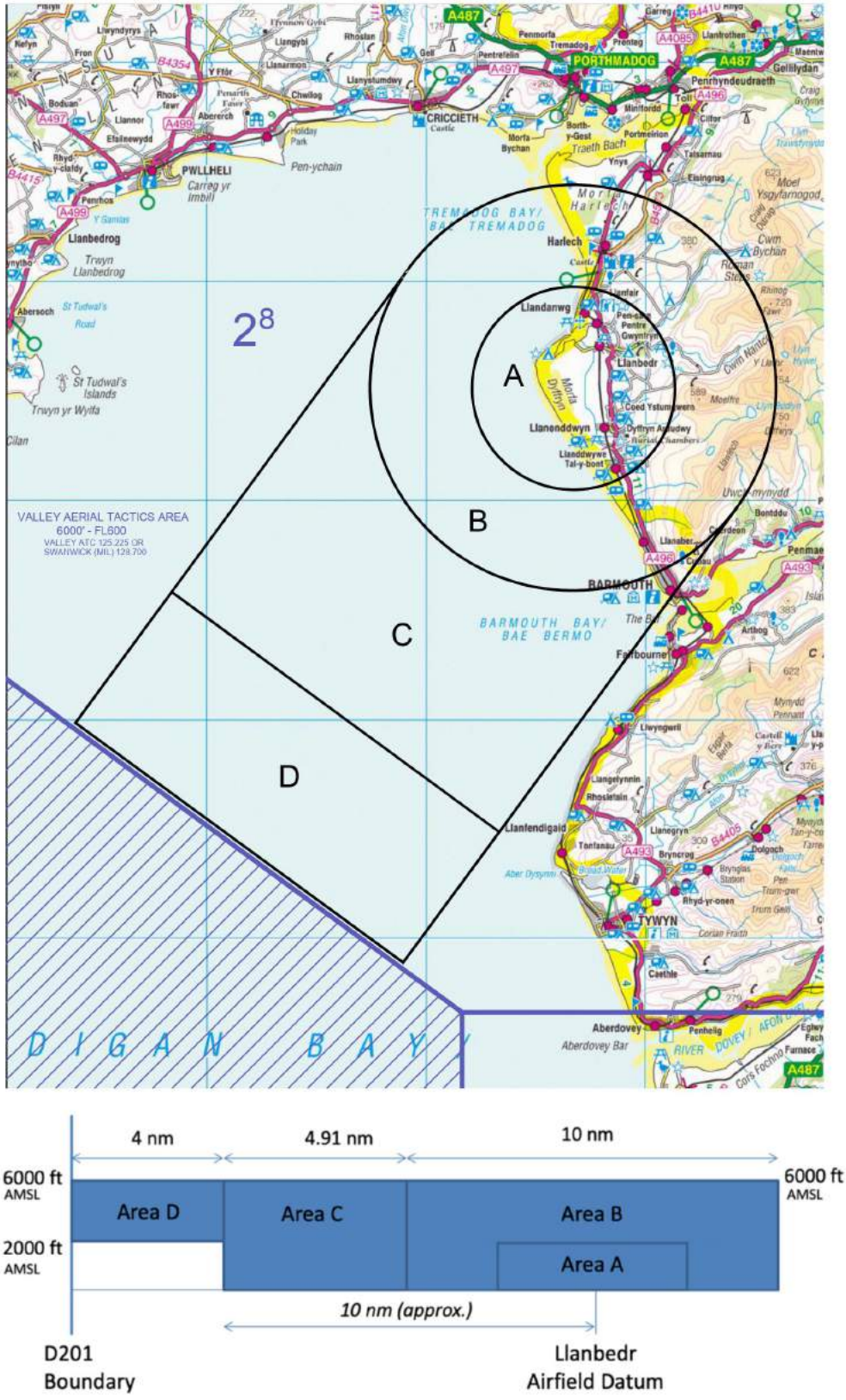

Figure 1 *– Draft airspace design Option #1 for ACP-2019-58, Llanbedr Danger Area (DA)*

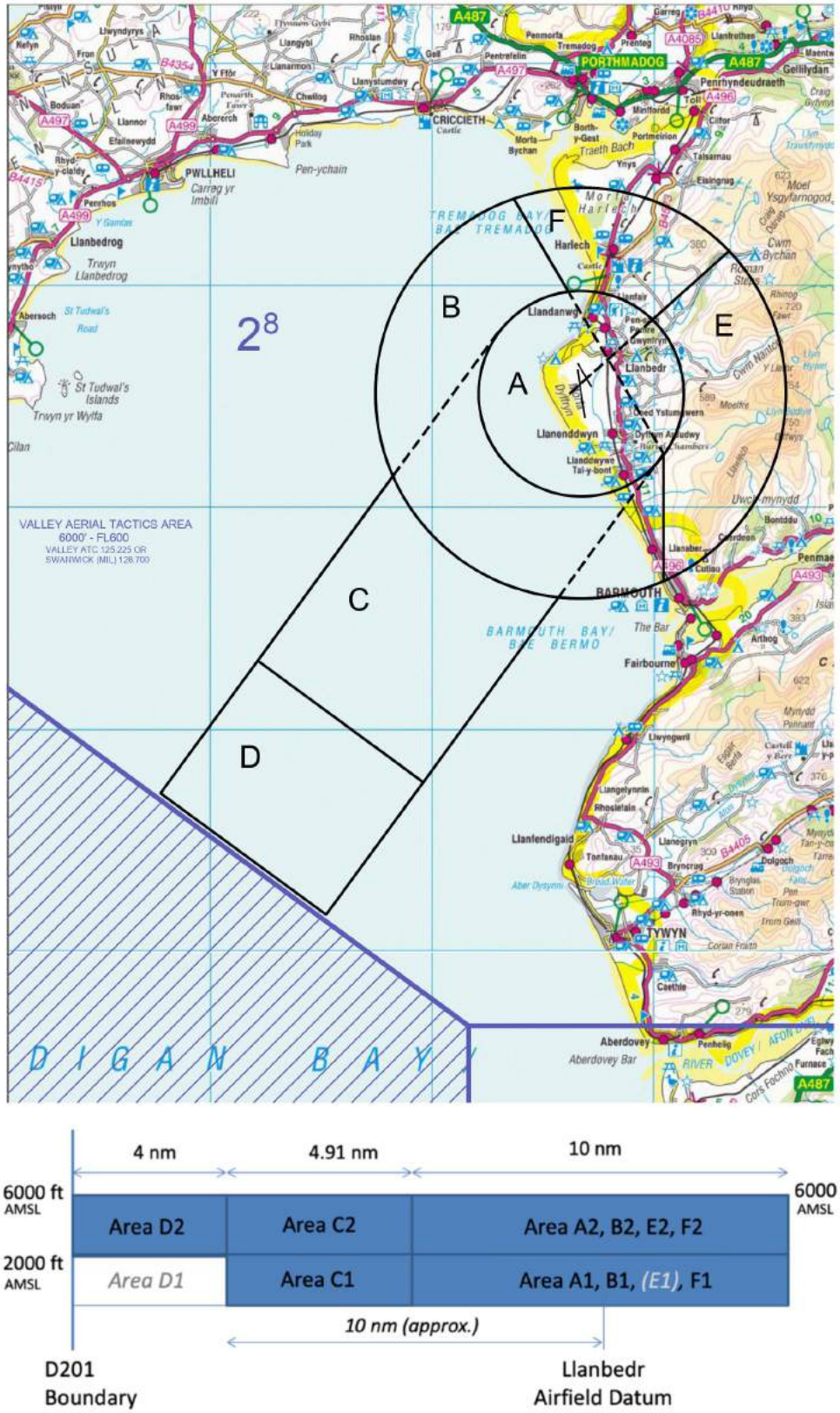

***Figure 2** – Draft airspace design Option #2 for ACP-2019-58, Llanbedr Danger Area (DA)*