

Snowdonia Aerospace Airspace Change Proposal Consultation Strategy (Stage 3A), ACP-2019-58 Llanbedr Danger Area (DA)

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# **Document Details**

Approval Level	Name	Authorisation
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Second reviewer and release authorisation		Chief Executive

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## Executive Summary

This report documents the Consultation Strategy proposed as part of the "Stage 3A Consultation Preparation" element of the Snowdonia Aerospace LLP submission for an Airspace Change Proposal, Reference: ACP-2019-58, Llanbedr Danger Area (DA), 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: <u>https://airspacechange.caa.co.uk/PublicProposalArea?pID=193</u>
- ACP-2020-02, Llanbedr Aerodrome Traffic Zone (ATZ), which can be accessed online via: <u>https://airspacechange.caa.co.uk/PublicProposalArea?pID=211</u>

The two Proposals are independent of each other and are being progressed separately.

The ACP-2020-02, which is specific to supporting ongoing and future military aircraft training, has presently been Paused and is NOT part of this forthcoming consultation. An opportunity to participate in the ongoing consultation of this ACP will follow at some stage in the future.

The forthcoming consultation and the basis of this document and the Strategy now being proposed is specific to the ACP-2019-58 which is solely in support of the RDT&E opportunities (and not related to military aircraft training), with a view to creating a permanent Danger Area that will enable Llanbedr Aerodrome to increase support to the RDT&E for next-generation UK aerospace - *e.g.* drones (particularly non-military "drones for good"), electric aircraft, urban/regional air mobility vehicles, balloons, airships, near-space testing *etc.* 

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. Snowdonia Aerospace (SAC) has successfully completed Stage 1 (Define) and Stage 2 (Develop and Assess) and all the supporting documentation can be found on the CAA Airspace Change Portal<sup>1</sup>. At this point the CAA also determined that ACP-2019-58 was confirmed as a Level 1 change. The requirements for Stage 3A, Consultation Preparation, are as follows:

- 1. produce a draft Consultation Strategy detailing the scale, nature and timescales of the proposed consultation;
- 2. produce a draft Consultation Document that allows stakeholders including those with no technical expertise to understand the potential impact of the proposed changes;
- 3. produce an Options Appraisal (Phase II Full) identifying potential impacts and mapping potentially affected stakeholders.

This document addresses the requirement for (1), the Consultation Strategy.

The default is for UK public consultations to have a 12-week duration, but CAP-1616 allows for consideration of a reduced consultation period where the request is a reasonable and proportionate solution and we present a strong rationale to justify that the ACP-2019-58 consultation should be 6 weeks in duration.

<sup>&</sup>lt;sup>1</sup> Ref: <u>https://airspacechange.caa.co.uk/PublicProposalArea?pID=193</u>

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There are multiple points to our rationale, but these can be broadly grouped as follows:

- The proportionate scale of the proposed change, reflective of the sites established and recognised use and heritage;
- The number of public engagements that have been conducted over recent years on both aviation and airfield planning matters with relatively low response rates and benign feedback;
- The proactive formal approach to consultation that is being adopted by SAC to engage as many people as possible in the current activity;
- The regular and ongoing engagement with airspace users and current CAA policy on engagement for Danger Areas.

We recognise that the proposed 6-week period will span Christmas and New Year and hence the consultation will be extended to 7 weeks in total to accommodate the holiday period.

The Consultation Strategy, as summarised below, is geared toward reaching as many stakeholders as possible, and as early in the consultation process as possible, with regular reminders:

- Prepare a single consultation document, suitable for all stakeholders to understand, interpret and comment upon, supported by a quick-look, easy-read guide and a full options appraisal;
- Consult directly with those aviation and non-aviation stakeholders that have been identified and participated in the initial stakeholder engagement at Stage 1 and 2;
- Consult with the wider local community through engagement with Town and Parish Councils, including those not previously contacted directly;
- Conduct early local press and media promotional engagements, including a Welsh-language version of the quick-look, easy-read guide;
- Conduct drop-in briefing events at SAC, including a dedicated Welsh language day;
- Reflective of our Key Performance Indicators (KPI's) contact members of any stakeholder groups who have not responded after 3 and 5 weeks to remind them of the deadline for consultation;
- Review and analyse the consultation responses and complete a Consultation Feedback report.

Table 1 below summarises the key dates and activities for the Consultation Process.

Activity	Location	Date
Stage 3C Consultation launch	CAA Airspace Change Portal	Monday 7 <sup>th</sup> December 2020
Public promotion	Local press, email, social media	w/c 7 <sup>th</sup> December 2020
Public drop-in sessions	Snowdonia Aerospace Centre (alternatively video conference in event of Covid-19 restriction)	Thurs 10 <sup>th</sup> December 2020 Fri 11 <sup>th</sup> December 2020 (Welsh) Sat 12 <sup>th</sup> December 2020
Stakeholder reminders	Email, social media	Mon 21 <sup>st</sup> December 2020
Stakeholder reminders	Email, social media	Mon 4 <sup>th</sup> January 2021
Consultation finishes		Fri 22 <sup>nd</sup> January 2021
Stage 3D Collate & review Stage 4A Update design		Monday 25 <sup>th</sup> January 2021
Stage 4B ACP Submission		Monday 8 <sup>th</sup> February 2021

Table 1 - Key dates and activities for the ACP-2019-58, Llanbedr Danger Area Consultation Process

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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 and established use for the 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>.

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<sup>&</sup>lt;sup>2</sup> View on Google Maps

<sup>&</sup>lt;sup>3</sup> Ref: National Statistics Wales, June 2018

<sup>&</sup>lt;sup>4</sup> Ref: Annual Lower Super Output Area (LSOA) Population Estimates, 2018

<sup>&</sup>lt;sup>5</sup> Aerodrome Traffic Zone (ATZ) as detailed in Article 5 of the Air Navigation Order, 2016, Ref: <u>Air Navigation Order, 2016</u>

<sup>&</sup>lt;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

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 (TDA) has previously been consulted on and implemented as and when required, either as a whole or in part, to support 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 generate a Horizontal Spaceport Development Master 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: <u>https://airspacechange.caa.co.uk/PublicProposalArea?pID=193</u>
- ACP-2020-02, Llanbedr Aerodrome Traffic Zone (ATZ), which can be accessed online via: <u>https://airspacechange.caa.co.uk/PublicProposalArea?pID=211</u>

The two Proposals are independent of each other and are being progressed separately. The ACP-2020-02, which is specific to supporting ongoing and future military aircraft training, has presently been Paused and is NOT part of this forthcoming consultation. An opportunity to participate in the ongoing consultation of this ACP will follow at some stage in the future. The forthcoming consultation and the basis of this document and the Strategy now being proposed is specific to the ACP-2019-58 which is solely in support of the RDT&E opportunities (and not related to military aircraft training), with a view to creating a permanent Danger Area that will enable Llanbedr Aerodrome to increase support to the RDT&E for next-generation UK aerospace - *e.g.* drones (particularly non-military drones for good), electric aircraft, urban/regional air mobility vehicles, balloons, airships, near-space testing *etc.* The Statement of Need for the application is declared as follows:

 To provide an environment for safe operation of all ongoing aerospace-related Research, Development, Test and Evaluation (RDT&E) activities in the vicinity of Llanbedr Airfield (EGFD) and the ability for associated aircraft to transit safely to/from Danger Area D201 to undertake extended range/endurance/altitude testing (in accordance with extant D201 procedures) without concern for other air traffic.

The proposal explicitly supports the Airspace Modernisation Strategy (CAP1711) by creating a permanent test zone in which to explore the airspace integration issues associated with new airspace users such as drones that are currently identified as "unknowns" in Chapter 5 of CAP1711.

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

The preface to the UK Government Aerospace Industrial Strategy, 2018, states that:

• 'Environmentally-friendly aircraft will increasingly incorporate electric technologies, and we anticipate more aircraft operating autonomously in the future. New markets for drones and Urban Air Mobility vehicles will be developed. We want the UK to be at the cutting edge of these exciting developments much as we were when Sir Frank Whittle developed the world's first jet engine'.

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Llanbedr has long been a UK national asset for aerospace RDT&E and there has been increased demand in recent years given its ideal location for Beyond Visual Line-of-Sight (BVLOS) drone testing. These activities have been satisfied to date by use of a Temporary Danger Area, but both customer demand and the need for confidence and reliance are now such that an application for a Permanent Airspace Change is warranted. The combination of safety, operational, technical and environmental factors already pertaining to low volume RDT&E activities is not expected to change.

Moving to a permanent Danger Area will allow an increase in throughput to satisfy the market need and provide UK businesses in these sectors with a surety of being able to operate in the UK on a reactive basis. Many UK businesses have chosen to undertake their testing abroad due to the uncertainties around availability of adequate and appropriate commercial trials environments. Figures 2a – 2f below gives an indication of some of the wide variety of novel aerospace systems and applications that have previously been tested at Llanbedr Aerodrome and which would benefit from a permanent Danger Area to help accelerate development and commercial exploitation.



**Fig. 2a** – Penguin B used to explore the potential for aeromedical delivery drones



**Fig. 2b** – Vertical Aerospace electric Urban Air Mobility (UAM) vehicle



Fig. 2c – Scheibel S100 Camcopter used to explore the potential for search/rescue drones



**Fig. 2d** – Astigan solar-powered high altitude, long endurance (HALE) vehicle



**Fig. 2e** – C-Astral Bramor used to explore the potential for mapping and surveying drones



**Fig. 2f** – The view of Cardigan Bay from the B2Space near-space testing balloon

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## 2. Consultation preparation and engagements to date

## 2.1. CAP1616 requirements and document scope

The CAA Civil Aviation Publication CAP1616<sup>7</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.

Snowdonia Aerospace has successfully completed Stage 1 (Define) and Stage 2 (Develop and Assess) and all the supporting documentation can be found on the CAA Airspace Change Portal<sup>8</sup>. At this point the CAA also determined that ACP-2019-58 was confirmed as a Level 1 change. The requirements for Stage 3A, Consultation Preparation, are as follows:

- 1. produce a draft Consultation Strategy detailing the scale, nature and timescales of the proposed consultation;
- 2. produce a draft Consultation Document that allows stakeholders including those with no technical expertise to understand the potential impact of the proposed changes;
- 3. produce an Options Appraisal (Phase II Full) identifying potential impacts and mapping potentially affected stakeholders.

This document addresses the requirement for (1), the Consultation Strategy.

The remainder of this section details the justification for a reduced consultation period for ACP-2019-58 and summarises the engagements to date that support this justification. Section 3 then details the consultation stakeholders and section 4 describes the consultation strategy itself.

### 2.2. Justification for a reduced-duration consultation period

The default is for UK public consultations to have a 12-week duration, but CAP-1616 allows for consideration of a reduced consultation period where the request is a reasonable and proportionate solution and there is a strong rationale to do so. The context for the ACP-2019-58 consultation is as follows:

- A previous 5-week, pre-CAP1616 consultation, conducted in August 2014 to support the original Temporary Danger Area<sup>9</sup> (effectively Design Option <sup>#</sup>1), was sent to 87 aviation and non-aviation stakeholders. Of these 87, 71 (82%) did not respond, whilst a total of 18% did respond, with 5 (6%) were in favour of the proposal, 2 (2%) were against the proposal and 9 (10%) were assessed as neutral;
- 2. The ACP-2019-58 Stage 1 and 2 engagement process reached out to in excess of 200 aviation and non-aviation stakeholders in May and June 2020. These engagements are summarised in more detail in Section 2.3, but again, the response rate was less than 20%. Where individuals / groups have replied during Stages 1 and 2 and were not on our original Stakeholder List these have now been added to the Stakeholder List thereby increasing the number of Stakeholders to be included at this Stage.

<sup>&</sup>lt;sup>7</sup> Ref: https://publicapps.caa.co.uk/docs/33/CAP1616\_Airspace%20Change\_Ed\_3\_Jan2020\_interactive.pdf

<sup>&</sup>lt;sup>8</sup> Ref: <u>https://airspacechange.caa.co.uk/PublicProposalArea?pID=193</u>

<sup>&</sup>lt;sup>9</sup> Ref: "Stakeholder Consultation Feedback - TDA in Mid Wales for Unmanned Aircraft", QINETIQ/MS/AD/TWP1404762, October 2014

- 3. The local population within the footprint of the ACP is very low. There are only 645 people documented as permanent residents in the closest village of Llanbedr (from the 2011 census, 2.3km from main runway centrepoint) and there is only a total of 6,800 people (approximately)<sup>4</sup> resident in all of the neighbourhoods that sit wholly or partially within the area covered by the ACP (LL42 to LL47 postcodes inclusive) with a population density <50 people per square km;</p>
- 4. A large element of this population has already been engaged through local councils as part of the initial Stage 1 and 2 activities (see Section 2.3);
- 5. The consultation strategy, as described in Section 4, is geared toward reaching as many stakeholders as possible in the first three weeks of the consultation process and pre-briefing key stakeholders who can help share the message;
- 6. The Temporary Danger (TDA) Area has been promulgated on a number of occasions over the past 5 years and there has been no complaints or concerns raised by any stakeholders during these periods of use. The aviation history associated with the site is such that changing the designation of the Danger Area from Temporary to Permanent is likely to be seen as "business as usual" by most of the local population;
- 7. Whilst this ACP relates to a Permanent Danger Area, the impact on aviation and non-aviation stakeholders is likely to be similar to that for a Temporary Danger Area and current CAA policy<sup>10</sup> advises that a 6-week engagement could be considered appropriate;
- 8. The application by SAC is not a standard Level 1 Change with the classification not being of a typical scale and impact of a Level 1 Change. The actual proportionate scale of change resulting from the application is considered in all circumstances as negligible;
- 9. SAC regularly engage with a range of airspace users and stakeholders throughout the year regarding its development and planned activities consequently there is an ongoing understanding of the operations being undertaken at the airfield;
- 10. SAC have through the planning process actively engaged (and continue to do so regarding its ongoing development programme) with a number of stakeholders and the community in relation to the airfield operations and activities:
  - Llanbedr Aerodrome and its proposed operations particularly those centred around R&D aerospace were the subject of extensive stakeholder and community engagement consultation during the period March 2016 to July 2018<sup>11</sup> as part its proposed allocation in the Eryri Local Development Plan for the period 2016 2031<sup>12</sup>. A number of stakeholder engagements and community involvement schemes with a range of organisation, groups and interested parties (including members of the public who had expressed an interest) were undertaken during this period and the Snowdonia Enterprise Zone (of which Llanbedr is part of) was considered to be one of the main topics raised through the consultation process;
  - Over the 8 Stages of the Consultation a total of 322 comments were received from 60 individual organisations. The resultant conclusion and allocation encouraged the ongoing and future use of Llanbedr Aerodrome for a range of aerospace activities particularly those focused on RDT&E;
  - The airfield secured a Certificate of Lawfulness for the use of the site for RDT&E of drones in July 2011. The application was submitted in December 2010 and over the consultation period of a minimum 8 weeks there was no representations were received from stakeholders or the public. This reflected and recognised the established use of the site for drone operations;

<sup>&</sup>lt;sup>10</sup> Ref: 20200721 – CAA Policy for the Establishment of Permanent and Temporary Danger Areas, Paragraph A3, <u>http://publicapps.caa.co.uk/docs/33/Policy%20Statement%20Permanently%20Established%20Danger%20Areas%20and%20Tempor</u> ary%20Danger%20Areas.pdf

<sup>&</sup>lt;sup>11</sup> Ref: <u>https://www.snowdonia.gov.wales/\_\_data/assets/pdf\_file/0027/247590/1-DC06-Consultation-Report.pdf</u>

<sup>&</sup>lt;sup>12</sup> Ref: https://www.snowdonia.gov.wales/planning/planning-policy/local-development-plan-ldp

• Many of the groups and organisations consulted in relation to the above are the same as those included in our Stakeholder List for ACP-2019-58.

Given points (1) to (10) above, we propose that there is a strong rationale to justify that a reasonable and proportionate duration for the ACP-2019-58 consultation is 6 weeks. However, given that this period will span the Christmas / New Year holidays, we propose to extend this to a 7-week period which we consider is therefore most appropriate. Section 4 describes the Consultation Strategy in more detail and highlights how this 7-week period will be used to maximise the reach of the Consultation Process.

## 2.3. Summary of ACP-2019-58 Stage 1 and 2 engagements

## 2.3.1. Stage 1

SAC undertook a number of stakeholder engagement activities to help shape the Danger Area design principles as part of the Stage 1 ACP process. In addition to targeted stakeholder meetings, a questionnaire was also sent out to over 200 stakeholders and interested parties.

The following points summarise the key outcomes from these activities:

- 1. The questionnaire responses were consolidated for analytical consistency so as to consider a single response from each separate organisation. This resulted in a total of 36 independent responses, of which 29 (81%) were positive, 7 (19%) were neutral, and 0 (0%) were 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 ACP process;
- Positive responses were received both from the aerospace / aviation community who are seeking to make use of the permanent Danger Area to enhance their products and services and also from the local community who can see the benefit that this business would bring to the regional economy;
- 4. The neutral responses raised issues / questions relating to two principle factors, (i) the impact of segregation on the flexible use of airspace for other aviation operators, and (ii) the potential noise/general nuisance impact on non-aviation leisure activities in Snowdonia National Park;
- 5. The draft design principles were reviewed and revised in light of (4);
- 6. SAC agreed to consider how engagement/consultation materials are developed to suit a range of audiences, such as how technical information will be communicated in an accessible way to non-aviation stakeholders.
- 7. SAC agreed that all future direct written communication is provided in both English and Welsh.

Further details and analysis can be found in the Stage 1B report<sup>13</sup>.

## 2.3.2. Stage 2

SAC prepared two design options for the Danger Area (DA) as part of the Stage 2A ACP process and requested further feedback and comment from the stakeholders and interested parties previously engaged on the Design Principles.

The following points summarise the key outcomes from this activity:

1. Option #1 described a baseline for the permanent Danger Area design based on the extant Temporary Danger Area. Option #2 is a further refinement based on feedback received as part of the two-way engagement process on the Design Principles;

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<sup>&</sup>lt;sup>13</sup> Ref: <u>https://airspacechange.caa.co.uk/umbraco/Surface/DocumentSurface/DownloadDocument/2244</u>

- 2. We received a further 32 responses to the request for stakeholder feedback on the design options. Of these 32 responses, 3 (9%) expressed a preference for Option #1, 9 (28%) expressed a preference for Option #2, 6 (19%) expressed no preference, 2 (6%) opposed both options, and 12 (38%) felt unable to comment pending further clarification (mostly non-aviation). We again noted that future engagement / consultation materials are developed to suit a range of audiences;
- Option #1 was considered to be easier to interpret and to provide greater flexibility for operators using the DA, whereas Option #2 was considered to be more complex but offered more advantages in terms of flexible use of airspace (FUA);
- 4. Other local airspace users, both military and general aviation, and a local landowner identified possible potential conflicts with both options. SAC wrote back to all of these stakeholders with additional information that we believe will allow a mutually acceptable solution to be achieved.

Further details and analysis can be found in the Stage 2A report<sup>14</sup>. Additional analysis was conducted as part of the Stage 2B Options Appraisal (Initial) and this has also been communicated to stakeholders that identified potential conflicts as part of the follow-up letters detailed in (4) above:

- 5. The assessment highlighted a strong economic case for implementation of a permanent Danger Area on the basis that it will (a) significantly enhance the UK RDT&E capability in environmentally-friendly aircraft and electric technologies in support of the 2018 Aerospace Industrial Strategy, and (b) generate jobs and related economic benefit in local communities;
- 6. The number of novel aerospace system flight movements is expected to double, but the numbers are relatively small (~100 days of Danger Area activation per annum and <200 flights per annum), the vast majority of operations (~90%) will be over the aerodrome or out over the sea and the vehicle size (the majority <150kg) and propulsion type (50%+ electric) mean that the noise and environmental impact is expected to be negligible;</p>
- 7. Despite a predicted increase in both novel aerospace RDT&E flying and RAF/MOD training, there is still considered to be sufficient capacity to accommodate all activities safely, including additional General Aviation. The estimate of approximately 100 days of Danger Area activation per annum translates to 2 days per week and with operations above 2000ft likely only 33% of the time. Appropriate air traffic management principles have already been identified to ensure spatial and temporal deconfliction across all elements of the Danger Area.

Further details and analysis can be also found in the Stage 2B report<sup>15</sup>.

## 2.4. Next steps

The stakeholder engagement feedback gained as part of Stages 1 and 2 has been used to help plan our stakeholder consultation strategy and prepare the consultation document, including the secondphase full options appraisal with more rigorous environmental evidence.

<sup>&</sup>lt;sup>14</sup> Ref: <u>https://airspacechange.caa.co.uk/umbraco/Surface/DocumentSurface/DownloadDocument/2288</u>

<sup>&</sup>lt;sup>15</sup> Ref: <u>https://airspacechange.caa.co.uk/umbraco/Surface/DocumentSurface/DownloadDocument/2290</u>

## 3. Consultation stakeholders

## 3.1. Non-Aviation Stakeholders

These stakeholders are likely to be interested in understanding the growth plans for Snowdonia Aerospace Centre, the potential benefit to the local economy and job creation, and determining whether they will experience a significant change in noise exposure or whether they will be overflown by aircraft. The Consultation Document will describe the future business forecasts for the airfield, contain maps of representative recent and future flight profiles, along with noise assessments and overflight metrics compared to historical records, to allow individuals to assess any impact the proposed changes may have on them.

## 3.1.1. Local Communities

SAC intends to primarily consult local communities through regional representatives and Town and Parish Councils (see 3.1.2 and 3.1.3). Additionally, public promotion of the consultation will be promulgated through local press and media which will also seek to encourage any individual or organisation to directly submit a response to the consultation.

## 3.1.2. Regional and Combined Authorities

All of the key regional councils who were engaged with during Stage 1 and Stage 2 will be targeted and asked to respond to the consultation. SAC will also engage again with the Member of Parliament (MP) and Welsh Government representatives who have interests in the area. The list of regional and national representative stakeholders that SAC plans to engage with can be found in Appendix A.

## 3.1.3. Town and Parish Councils

SAC will also target the Town, Parish and Community Councils that represent communities at the local level, most of whom have already been involved in the Stage 1 and Stage 2 engagement. The full list of civil authorities that SAC plans to engage with can be found in Appendix A.

## 3.1.4. Accessibility

SAC plans to hold a number of drop-in events at the airfield to allow interested parties to ask questions in person, one of which will be a dedicated Welsh language event. There will be free parking immediately outside of the hangar and all facilities will be accessible to disabled visitors. We're also proposing to generate a short easy-read version of the Consultation Document, which will also be available in both English and Welsh.

### 3.2. Aviation Stakeholders

Most of the aviation stakeholders have already been involved in the Stage 1 and Stage 2 engagement and are known to be interested in the number of days of activation of the Danger Area, the Air Traffic Management (ATM) procedures that will be put in place, and the Flexible Use of Airspace (FUA). The Consultation Document will address all of these issues.

### 3.2.1. SAC-based Operators

SAC will continue to consult with business and General Aviation users that operate from the airfield. These have been listed in Appendix A.

### 3.2.2. Local General Aviation

SAC will continue to consult with General Aviation airspace users that have been identified as operating in proximity of the proposed changes as listed in Appendix A.

### 3.2.3. Ministry of Defence

SAC will continue to consult with the MOD as a mandatory stakeholder in all airspace changes, via the Defence Airspace and Air Traffic Management organisation (through the auspices of the NATMAC) and directly to local military airfields whose operations may be affected by the proposed changes. A list of military stakeholders directly contacted is included in Appendix A.

## 3.2.4. Air Navigation Service Providers

SAC will continue to consult with relevant Air Navigation Service Providers (ANSP) as listed in Appendix A.

## 3.2.5. National Organisations

SAC will continue to consult with National Organisations with aerospace / aviation interests as listed in Appendix A.

## 3.3. Environmental Stakeholders

SAC will continue to engage with organisations whose primary interest is environmental (*e.g.* noise, local air quality and tranquillity). The Consultation Document will contain maps of representative recent and future flight profiles, along with noise assessments and overflight metrics compared to historical records, to allow individuals and organisations to assess any impact of the proposed changes. The list of environmental stakeholders that SAC plans to engage with can be found in Appendix A.

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## 4. Consultation strategy

## 4.1. Communication approach

## 4.1.1. Pre-launch

We propose holding a number of pre-consultation launch briefings with key local stakeholder groups that we have been in regular contact with throughout the ACP process to date, namely:

- A presentation via video conference as part of the Snowdonia Enterprise Zone Oversight Board Meeting with Welsh Government and local councillors has already been held on Thursday 22<sup>nd</sup> October 2020;
- A video conference with Gwynedd Council and local Town, Parish and Community councillors will be conducted during week commencing Monday 30<sup>th</sup> November 2020.
- A video conference with local aviation stakeholders from RAF Valley / Mona, Caernarfon, Welshpool and Talybont airfields will be conducted during week commencing Monday 30<sup>th</sup> November 2020.

Pre-briefing these key stakeholder groups will help us reach as many people as possible, as early as possible in the consultation process.

## 4.1.2. Launch

The consultation will be launched on Monday 7<sup>th</sup> December 2020 via the CAA Airspace Change Portal. We will contact stakeholders listed in Appendix A via email when the consultation is launched and they will be able to view and download the consultation documentation and can also submit a response through the website. We will accept submissions from all individuals or organisations who respond (see 4.1.3 to 4.1.5), but only the stakeholders discussed in this document will be contacted directly. We will maintain a record of consultation activity with all stakeholders throughout the process. SAC will also assist stakeholders to access the airspace change documentation and submit their response if they require support.

### 4.1.3. Promotion

We will issue a press release on Monday 7<sup>th</sup> December 2020 containing information about the consultation and directing interested parties to the CAA portal and the in-person stakeholder events (see 4.1.4). We will use our existing database of media outlets, including BBC Wales (television, radio and online) and the Daily Post / North Wales Live (print, online) to ensure a series of public promotions throughout week commencing 7<sup>th</sup> December that includes all media covering the area likely to be affected by the proposed changes, and also including relevant nationwide aviation publications / websites. We will also use our own social media channels to broadcast the message.

### 4.1.4. Stakeholder events

Following on from the press / media promotion of the consultation on Monday 7<sup>th</sup> December, we propose holding a series of follow-up stakeholder events at Snowdonia Aerospace Centre from 10am to 4pm on Thursday 10<sup>th</sup> December and Friday 11<sup>th</sup> December and 10am to 2pm on Saturday 12<sup>th</sup> December to allow people to drop-in and discuss the consultation in person. SAC will also assist attendees to make an online response during their visit if requested. Friday 11<sup>th</sup> December will be designated as a Welsh language event and we will have a translator available to facilitate questions and answers.

The events will be held in the Main Hangar at the Snowdonia Aerospace Centre with free parking immediately outside the building and a one-way pedestrian system in place inside and outside to ensure adequate social distancing in line with the latest Covid-19 best practice for public events. Refreshments and toilet facilities will be available and all the facilities are accessible to disabled visitors. In the event that changes in the Covid-19 restrictions for Llanbedr prevent a public event on

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the dates stated, we will first look to rearrange within the consultation period, but with the fallback that we will hold a similar series of events via video conference.

## 4.1.5. Postal submission

Interested parties will also be able to submit a postal response to the consultation and a paper copy of the online questionnaire will be available on request (Appendix B). We will not commit to respond to all postal responses, but respondents are welcome to include a stamped envelope if they do require a reply. The consultation postal address will be available online, within the consultation document and as included as part of the press release.

## 4.1.6. Consultation period and reminders to stakeholders

We propose to open the consultation on Monday 7<sup>th</sup> December 2020 and run it for a period of 7 weeks through to close on Friday 22<sup>nd</sup> January 2021. The justification for a 7-week period has been discussed previously in Section 2.2.

We are confident that the publicity and stakeholder events during December will encourage the vast majority of interested parties to respond promptly during the first three weeks of the consultation, but we are also conscious that the remainder of the consultation period will straddle the Christmas and New Year holidays. We are therefore proposing to issue two sets of reminders to stakeholders:

- We will email all of the stakeholders listed in Appendix A on Monday 21<sup>st</sup> December 2020, at the beginning of Week 3, to encourage further submissions before Christmas. We will also publish the reminder on our social media channels;
- We will email all of the stakeholders listed in Appendix A on Monday 4<sup>th</sup> January 2021, at the beginning of Week 5, to encourage a final set of submissions after the New Year and prior to closure of the consultation period on Friday 22<sup>nd</sup> January 2021. We will also publish the reminder on our social media channels;
- We will undertake regular and ongoing reviews of responses received against our Key Performance Indicators (KPIs) and where it is felt appropriate (if necessary) we will make direct contact with stakeholders urging them to respond to the Consultation.

## 4.1.7. Response acknowledgement and processing

We will acknowledge consultation responses by sending a message to the user, using the email address provided. Responses will be categorised in accordance with CAP 1616 Appendix C and posted on the CAA portal. If responses contain any commercially sensitive data, this will be redacted.

SAC will use the Christmas recess to determine progress of the consultation to date and will contact the CAA if significant deviations from the Consultation Strategy have arisen. Key Performance Indicators (KPIs) that will show whether the consultation is on track will include:

- 1. Feedback received from each of the key stakeholder groups identified in Section 3;
- 2. A response rate from the direct engagement of stakeholders in Appendix A that is commensurate with previous engagements;
- 3. Proof of local media publicity (see Section 4.1.2);
- 4. Attendance record for the public stakeholder events (see Section 4.1.3).

SAC will also post responses to any Frequently Asked Questions (FAQs) on the portal where common themes emerge. In the unlikely event that an unexpected, challenging response is received, the sponsor will commit additional resources to resolve the challenge where possible.

## 4.2. Consultation Document

The Consultation Document will be available via the CAA airspace change portal, along with documentation from Stage 1 and 2.

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The Consultation Document will begin with an introduction to the Airspace Change Process and an explanation of the purpose of consultation. It will then describe the specifics of the proposal, including the baseline situation, the options considered and its suggested benefits and impacts. It will conclude with a description of how stakeholders can participate.

It will seek to make it clear to all Stakeholders that the Document relates solely to ACP-2019-58 seeking a Permanent DA to support RDT&E operations and does not relate to ACP-2020-02 which is specific to supporting ongoing and future military aircraft training. It will also seek to make it clear to non-aviation Stakeholders that "Permanent" does not mean what the layman may understand as permanent and that any DA will only be active during times of use and all other times will be open as Class G Airspace.

An environmental analysis focussing on noise and emission impacts has been completed for the proposed change and a summary has been included in the Consultation Document.

The majority of stakeholders will be non-aviation specialists and hence we have tried to include a non-technical explanation of the airspace change as far as is reasonably practicable and to provide all stakeholders and interested parties with sufficient information to be able to form a reasonable understanding of the situation. We have also arranged a series of engagement events where stakeholders can discuss any issues in person (see 4.1.4).

## 4.3. Post-consultation and next steps

At the end of the consultation period, we will collate and review the feedback received and highlight any issues that might influence the final submission. We will set out any design changes between the initial consultation and final submission following the recommended 'we asked, you said, we did' format. The feedback document will be available for download via the CAA portal at Stage 3D, and the full Airspace Change Proposal at Stage 4 will reflect the final design described in the feedback report. Table 2 below summarises the key dates and activities for the Consultation Process and will also be included in the Consultation Document.

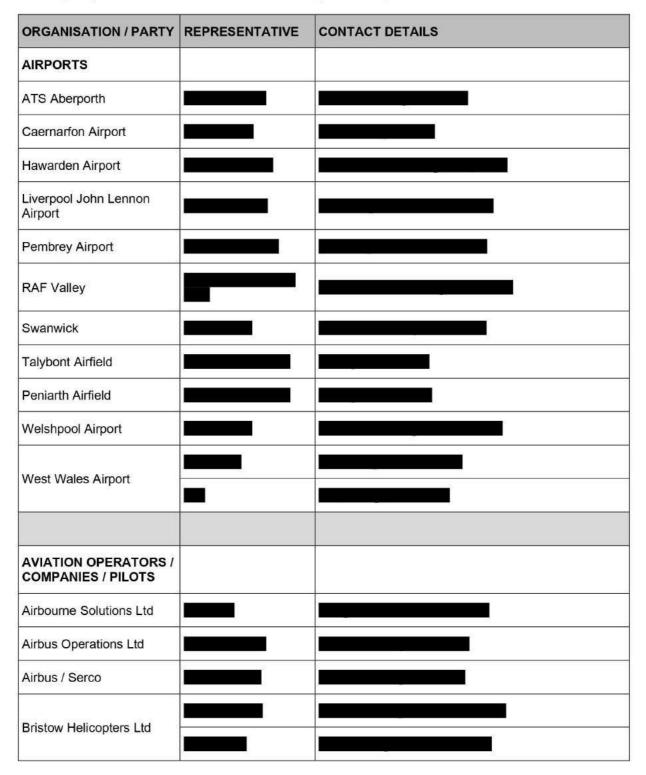
Activity	Location	Date
Pre-consultation brief to local council stakeholders	Snowdonia Enterprise Zone Oversight Board Meeting	Thursday 22 <sup>nd</sup> October 2020
Stage 3B Consult Gateway		Friday 27 <sup>th</sup> November 2020
Pre-consultation brief to local aviation stakeholders	Video conference	w/c 30 <sup>th</sup> November 2020
Stage 3C Consultation launch	CAA Airspace Change Portal	Monday 7 <sup>th</sup> December 2020
Public promotion	Local press, email, social media	w/c 7 <sup>th</sup> December 2020
Public drop-in sessions	Snowdonia Aerospace Centre (alternatively video conference in event of Covid-19 restriction)	Thurs 10 <sup>th</sup> December 2020 Fri 11 <sup>th</sup> December 2020 (Welsh) Sat 12 <sup>th</sup> December 2020
Stakeholder reminders	Email, social media	Mon 21 <sup>st</sup> December 2020
Stakeholder reminders	Email, social media	Mon 4 <sup>th</sup> January 2021
Consultation finishes		Fri 22 <sup>nd</sup> January 2021
Stage 3D Collate & review Stage 4A Update design		Monday 25 <sup>th</sup> January 2021
Stage 4B ACP Submission		Monday 8 <sup>th</sup> February 2021

Table 2 - Key dates and activities for the ACP-2019-58, Llanbedr Danger Area Consultation Process

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## Appendix A - List of stakeholders

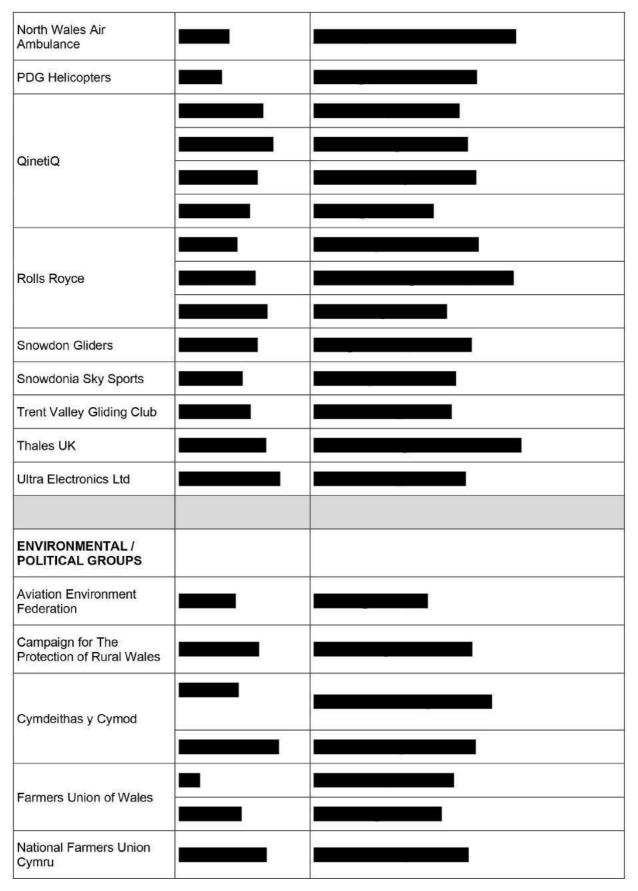
The following list of stakeholders have been party to the CAP1616, ACP-2019-58, Llanbedr Danger Area (DA) engagement process at Stages 1 and 2, and / or have been in contact with Snowdonia Aerospace within the duration of the ACP process to date, and will be contacted directly as part of the Stage 3 process as soon as the consultation period is opened.



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British Airways (BA)		
Babcock MSC (Onshore)		
RAE Systems Warton		
BAE Systems Warton		
Castle Air		
Cameron Balloons Ltd		
Pilot / constructor		
Denbigh Gliding		
Eastern Airways		
Electroflight		
Hereford Gliding	-	
Lindstrand Technologies Ltd		
Local pilot		
London Sailplanes		
London Gliding Club		
Low Fare Airlines		
Midlands Gliding Club		
Mona Flying Club		
Pilot / GA Lobbyist		
National Police Air Services		

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National Trust		
Snowdonia Society		
LLANBEDR AIRCRAFT OPERATORS / PILOTS		
Pilot		
Skydive Snowdonia		
Pilot		
Snowdonia Flight School		
Pilot		
Whizzard Helicopters		
LOCAL & COUNTY / REGIONAL COUNCIL & GOV		
Assembly Member		
Barmouth Community Council		
Barmouth Town Council		
Busnes@Llandrillo Menai		

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Cadw	
Cauw	
Country Land & Business	
Association Wales	
Dyffryn Ardudwy Community Council	
Gwynedd County Council	
Harlech Community Council	
Llanbedr Community Council	
Llanfair Community Council	
MP	
Natural Resources Wales	
NESTA	

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North Wales Economic Ambition Board	
North Wales Tourism Board	
Snowdonia Enterprise Zone	
Snowdonia National Park Authority	
Talsarnau Community Council	
Talybont Community Council	
UK Research & Innovation (UKRI)	
Die Londorschilden.	
Visit Wales	
Welsh Government	
Welsh Office	
LOCAL LANDOWNERS / FARMERS	
Argoed Farm	
Bailey Sand Partners	
Faeldre Farm	
Glyn Estate	

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Hen-Dy Farm	
Maes Y Garnedd	
Shell Island	
Ystimgwern Farm	
MOD / MILITARY	
DAATM-AIRSPACE OPS SO2	
Defence UAS Capability Development Centre	
Military Aviation Authority (MAA)	
NATIONAL AUTHORITIES	
CAA Innovation Team (Regulatory Sandbox)	
(	
Connected Places Catapult	
Department of Transport	
Isle of Man CAA	
H M Coastguard Search & Rescue	
NATS	

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North Wales Fire & Rescue	
Local Resilience Forum Co-ordinator - North Wales	
North Wales Police	
UK Space Agency	
UK Airprox Board (UKAB)	
UK Flight Safety Committee (UKFSC)	
Satellite Applications	
Catapult Ltd	
SPACE COMPANIES	
Artemis Space Technologies	
Deimos Space UK Ltd	
B2space Ltd	
Newton Launch Systems Ltd	
Sent into Space	
Spaceflight Academy Ltd	

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Space Forge	
N	
Northrop Grumman	
Northern Space Consortium	
Raptor Aerospace	
Skyrora	
UKLSL	
TRADE ORGANISATIONS GENERAL	
ADS Group	
Aerospace Wales	
Airlines UK	
Allines OK	
Airspace4all	
Airport Operators	
Association (AOA)	
Airfield Operators Group (AOG)	
Aircraft Owners and Pilots Association (AOPA)	
Airspace Change Organising Group (ACOG)	
Association of Remotely Piloted Aircraft Systems UK (ARPAS-UK)	

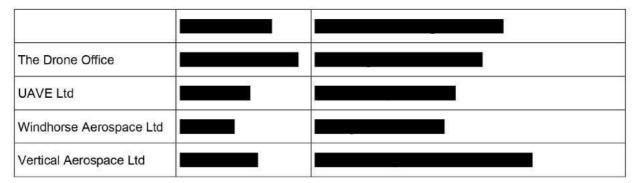
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British Airline Pilots Association (BALPA)	
British Balloon and Airship Club	
British Business and General Aviation Association (BBGA)	
British Gliding Association (BGA)	
British Helicopter Association (BHA)	
British Hand Gliding and Paragliding Association (BHPA)	
British Microlight Aircraft Association (BMAA) / General Aviation Safety Council (GASCO)	
British Model Flying Association (BMFA)	
British Skydiving	
Frazer-Nash Consultancy Ltd	
General Aviation Alliance (GAA)	
Guild of Air Traffic Control Officers (GATCO)	
Heavy Airlines	
Helicopter Club of Great Britain (HCGB)	
Honourable Company of Air Pilots (HCAP)	
Light Aircraft Association (LAA)	_
PPL/LR (Europe)	

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Royal Aero Club	
RMR Consultants	
UAV OPERATORS / COMPANIES	
Across UAVs	
Archangel Aerospace	
Astigan Ltd.	
Auriga	
Drone Major	
Callen-Lenz Associates Ltd	
Cloudbasepro	
Coptrz	
Cyclops Air Ltd	
Dronamics Global Ltd	
GEDPR	
Hawksland Unmanned Aircraft Systems	
Iprosurv	
Manchester University	
Manna Aero	
Prism Defence	
Samad Aerospace	
Skyports Ltd	
Southampton University	

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# Appendix B – Consultation Questionnaire

The following is the print copy of the online Consultation Questionnaire that will be distributed to stakeholders on request.

# Snowdonia Aerospace Centre Danger Area Airspace Change Proposal

#### Overview

The aim of this consultation is to seek stakeholders views on the introduction of a change in designation of airspace at and around the Snowdonia Aerospace Centre at Llanbedr Aerodrome.

Snowdonia Aerospace LLP is continuing to progress and further develop a number of complementary business opportunities at Llanbedr Aerodrome relating to research, development, test and evaluation (RDT&E) of next-generation UK aerospace - e.g. drones (particularly nonmilitary "drones for good"), electric aircraft, urban/regional air mobility vehicles, balloons, airships, near-space testing *etc.* To support these operations, 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 has to date operated under a Temporary Danger Area when undertaking activities of the nature described above. Due to the restrictions associated with a Temporary Danger Area, we are now proposing to introduce a Permanent Danger Area at Llanbedr Aerodrome. This will not increase the present volume of segregated airspace around Llanbedr Aerodrome associated with the current Temporary Danger Area approach, but changing to a Permanent Danger Area will allow us to increase throughput to satisfy the market need and provide UK businesses in the aerospace sector with a surety of being able to operate in the UK on a reactive basis. Note that "Permanent" merely means the designation is permanent and does not have to be applied for on a repeated basis. None of the areas of the proposed Danger Area will be permanently active.

The purpose of this consultation is for you, our stakeholders, to respond effectively to the information we have provided.

#### Why we are consulting

This consultation allows Snowdonia Aerospace, who is the Change Sponsor, to gather and consider views and information from relevant stakeholders about any potential impacts of this Airspace Change Proposal (ACP). Stakeholders have a crucial role to play in providing relevant and timely feedback to Snowdonia Aerospace with their views and opinions on any impact of this ACP.

The Consultation Document can be read in conjunction with the Consultation Strategy, which outlines the consultation approach, and Full Options Appraisal, which assesses the costs, benefits, and potential environmental impacts of introducing the new procedures.

You have the opportunity to provide relevant feedback, which may conflict with that of other stakeholders. After the consultation has ended, we will consider all your feedback and then produce the final design proposal, which may differ from that described in this document.

The consultation begins on 7th December 2020 and ends on 22nd January 2021.

#### Introduction

#### 1 What is your name?

Full name

#### **2** What is your email address?

If you enter your email address then you will automatically receive an acknowledgement email when you submit your response.

Email address

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3 Please enter your postcode (most relevant to your response e.g. home / work / organisation etc).

Postcode (Required)

**4** Are you responding as an individual or do you represent an organisation?

Please select only one item

🔵 Individual

Organisation

5 If you are responding on behalf of an organisation, what is the organisation name?

6 If you are responding on behalf of an organisation, what is your position/title?

7 In accordance with the UK Civil Aviation Authority's CAP 1616 airspace change process, consultation responses will be published on Citizen Space via the Airspace Change Portal. Responses will be subject to moderation by the Civil Aviation Authority (CAA). If you wish your response to be published anonymously your personal details (Name, Address & Position) will be redacted and only be seen by the CAA.

Please select only one item

Yes

Snowdonia Aerospace Centre Danger Area Airspace Change Proposal

8 Do you support the proposed Snowdonia Aerospace Airspace Change Proposal?

Please select only one item

SUPPORT – I support the proposed changes

NEUTRAL – I neither support nor object

OBJECT – I object to the proposed changes

NO COMMENT – I have no comment to make on the proposed changes

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# **9** Please rank your response to each of the Airspace Design Options as presented in the Consultation Document.

Consultation Document.		
	Option 1	Option 2
Strongly Support Please select only one item	0	0
Support Please select only one item	0	0
Neutral Please select only one item	0	0
Object Please select only one item	0	0
Strongly Object Please select only one item	0	0

#### 10 If you support this proposal, are there any alterations that would further improve it for you?

11	If you oppose this proposal, why? Can you suggest any mitigation or alterations that would resolve
	your opposition?

Why do you oppose?

Mitigation or Alterations

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