



**Snowdonia Aerospace Airspace Change Proposal  
Consultation Review (Stage 3D), ACP-2019-58  
Llanbedr Aerodrome Danger Area(DA)**

**Annex 4 – Additional Stakeholder Comments and  
Correspondence**

## Document Details

Approval Level	Name	Authorisation
Author		Consultant
First reviewer		Airfield Manager
Second reviewer and release authorisation		Chief Executive

Issue	Amendment Details	Date
1.0	First formal release	8 <sup>th</sup> February 2021

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## 1. Postal Response

The following consultation response was received via post.

## 1.1. Response Post001

### Appendix A – 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 non-military "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

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  
 No

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



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

	Option 1	Option 2
Strongly Support <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>
Support <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>
Neutral <i>Please select only one item</i>	<input checked="" type="radio"/>	<input checked="" type="radio"/>
Object <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>
Strongly Object <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>

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

Sylwadau ynghlwm.

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

Dolch i SA am eu cyflwyniad i mi ar faes awyr Llanbedr ac am ateb fy nghwestiynau.

'Roeddwn yn falch iawn o weld eu bod yn gwneud defnydd adeiladol o'r Maes Awyr e.e. drwy ddefnyddio dronau i ddanfôn diffibiliwr mewn argyfwng. Fe fyddwn yn cymeradwyo defnydd o'r math yma.

**Fel y gwelwch niwtral ydwyf ynghylch ehangu'r Gofod Awyr gan fod gen i rai pryderon.**

1. Y prif un yw'r defnydd posib o'r Maes awyr ar gyfer militariaeth. Yn ôl a ddeallaf ni fydd caniatâd i ddefnyddio'r is adeiledd y mae Cyngor Gwynedd yn gysylltiedig ag ef i'r perwyl; ond ni chafwyd sicrwydd o hynny am weddill y maes awyr.

2. Os bydd y newid yn caniatáu i'r gweithlu yn LLEOL gael eu cyflogi ar gyfer y math o waith a fyddai o les i'r gymuned yna byddwn yn falch o'i gefnogi. Gyda newid hinsawdd yn her mor enfawr i'n byd, hoffwn ichi ystyried polisiau carbon niwtral yn eich cynlluniau.

3. Ni ddylai'r gwaith amharu yn anffafriol ar yr amgylchedd a bydd angen cadw'r sŵn i lefel sy'n dderbyniol i'r gymuned.

4. 'Roeddem yn siomedig iawn ynglŷn ag agwedd y CAA i'r Gymraeg ond yn fodlon ar y defnydd priodol a wneir o'r iaith gan SA.

#### **SAC comment in response to Post001:**

The above comment has been translated as follows:

*"Thanks to SA for their presentation to us at Llanbedr airport and for answering our questions. 'We were very pleased to see that they were making constructive use of the Airport e.g. by using drones to deliver a defibrillator in an emergency. We would recommend use of this kind. As you can see we are neutral about expanding Airspace as we have some concerns. 1. The main one is the potential use of the Airport for militarism. As we understand it will not be permitted to use the infrastructure to which Gwynedd Council is connected for this purpose; but no guarantee was given for that airport. 2. If the change would allow the LOCAL workforce to be employed for the kind of work that would benefit the community then benefit would be pleased to support it. With climate change such a huge challenge in the world, we want you to consider carbon neutral in your plans. 3. The work must not adversely affect the environment and the noise will need to be kept to a level acceptable to the community. 4. We were very disappointed with the CAA's attitude to Welsh but were happy with the appropriate use of the language by SA."*

The issues raised by this respondent have been considered and we believe do not impact on the airspace design being proposed and have therefore been categorised as a Category C impact.

Items 1-3 have been addressed in greater detail in the Stage 3D Report and the Stage 4A Phase III Full Options Appraisal.

SAC will continue to work with all stakeholders to coordinate activities and minimise disruption or nuisance as far as is reasonably practicable.



## 2. Email Responses

The following consultation responses were received via email.

## 2.1. Response Email001

**From:** Airspace Policy <[Airspace.Policy@caa.co.uk](mailto:Airspace.Policy@caa.co.uk)>  
**Sent:** 25 January 2021 08:  
**To:** Danger Area - Snowdonia Aerospace <[da.acp@snowdoniaaerospace.com](mailto:da.acp@snowdoniaaerospace.com)>  
**Cc:** Airspace Policy <[Airspace.Policy@caa.co.uk](mailto:Airspace.Policy@caa.co.uk)>  
**Subject:** FW: Llanbedr Airspace (Danger Area) consultation closing 22nd January 2021  
**Importance:** High

Hello,

Please see below for your attention.

Kind regards



Airspace Specialist (Correspondence)  
Airspace, ATM & Aerodromes  
Civil Aviation Authority

**From:** [REDACTED]  
**Sent:** 21 January 2021 21:44  
**To:** AirspacePortal <[Airspace.Portal@caa.co.uk](mailto:Airspace.Portal@caa.co.uk)>  
**Subject:** FW: Llanbedr Airspace (Danger Area) consultation closing 22nd January 2021  
**Importance:** High

Dear Sir/ Madam

We have encountered difficulties accessing the consultation document via the online survey link and so now resort to making this response to the consultation which we would be grateful if you could acknowledge.

Baileys and Partners are agents for and on behalf of neighboring landowners and businesses to Llanbedr airfield, namely E S Bailey & Sons (farming partnership) and Dyffryn Seaside Estate Co Limited. Please note that Dyffryn Seaside Estate Co Limited have been omitted off list and should be included in all such consultations going forward.

Dyffryn Seaside Estate Company Limited was first incorporated on the 28<sup>th</sup> June 1960. It employs 35 seasonal staff and 25 full time staff and consists of 248 static holiday homes, 27 chalets/ lodges, 35 touring caravan pitches, 200 tent pitches and 5 holiday bungalows, accommodating over 2000 people per night at maximum capacity. A significant number of the accommodation units are owned under long leases by third parties giving the practicable effect of a village in multiple ownership. The numbers exclude the general public visiting the area or walking the Wales Coast Path or the beach itself (referred to later).

Our clients' property is located approximately 300 meters south of the end of the main runway at Llanbedr Airfield. Approximately 2000m of the Wales Coast Path also goes through our client's property which is understood to be located approximately 100m away from the airfield runway.

Our clients contribute to a tourism offer that is worth nearly a billion pounds to the Gwynedd economy annually, with around 7 million visitors coming to the region each year.

Our clients support other businesses that have desires to employ local people much as my clients have for a significant period of time. We also note that the intention is for 90% of the operations using the Danger Area (DA) to be over the airfield or over the sea. Notwithstanding this my clients concern is how this intention will be regulated and also what impact if any the remaining 10% of operations will have on my clients property namely:

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- \* Impact on local and visitor safety in and around the airfield.
- \* Impact on health and well-being of locals and visitors in the area.
  - \* Impact on local economy – cost benefit analysis. If this genuinely is intended to create local jobs, let's see a plan of this and please ensure the plan realistically also considers what impact this proposal may have on existing jobs namely in tourism in the locality.
- \* That these proposals do not infringe on neighboring property rights and the quiet enjoyment of those properties are not prejudiced.
- \* That these proposals do not adversely impact on the value of local businesses and homes.

As such my clients are seeking confirmation that the designation of a permanent DA does not risk any of the following:

- Employment of 25 full time staff.
- Employment of 35 seasonal staff.
- The loss of the direct economic benefit to the locality of 2000 people at maximum capacity staying at our client's property every night.
- The loss of the indirect economic benefit arising out of the supply chain to our client's property.
- The loss of the Wales Coast Path and access for the public to the beach through our client's property.

If the DA proposes to sterilize the existing or future use of Dyffryn Seaside Estate Co Limited or the farm partnership assets – or make it more unsafe than it is at present, in our opinion the permanent DA should not be approved.

Our clients have not been directly contacted by Snowdonia Aerospace to discuss potential impacts on my clients businesses which border the airfield and are therefore unclear on the consequences for their business of any constraints created by the DA. They would like to be personally consulted with such that they can be assured on what impacts this may have on them and the locality.

Yours faithfully

[Redacted Signature]

[Redacted Name]

Director  
RICS Registered Valuer

[Redacted Address]

[www.baileysandpartners.co.uk](http://www.baileysandpartners.co.uk)





**SAC comment in response to Email001:**

The issues raised by this respondent have been considered and we believe do not impact on the airspace design being proposed and have therefore been categorised as a Category C impact.

We believe all matters raised have been considered and addressed in greater detail in the Stage 3D Report and the Stage 4A Phase III Full Options Appraisal and are easily mitigated and manageable.

Any assertions or assumptions concerning the closure of local businesses is completely proven to be unfounded and inconsistent particularly when considering the historical and current and ongoing established use of and operations at the airfield. The airfield and the airspace around it, the latter which comprised of previously a much larger DA than presently being proposed and a TDA, again larger than now being proposed in the final design Stage 4A, have operated successfully and safely in parallel with all local business in the region including those immediately abutting the airfield over a number of years without any adverse effect or impact on their businesses.

SAC will continue to work with all stakeholders to coordinate activities and minimise disruption or nuisance as far as is reasonably practicable.

The below was our initial formal response to this respondents correspondence.

**Response to Baileys and Partners Ltd**

**From:** Danger Area - Snowdonia Aerospace

**Sent:** 31 January 2021 22:08

**To:** [REDACTED]

**Subject:** FW: Llanbedr Airspace (Danger Area) consultation closing 22nd January 2021

Dear [REDACTED]

Just to let you know that Airspace Policy forwarded your response to us on 25<sup>th</sup> January after the consultation deadline but we note your email was sent on 21<sup>st</sup> January. Your letter is with our Consultant for consideration and inclusion in the results as with all other inputs, thank you.

In relation to your last point. We have been communicating to you at the above email address on the basis you represented both Shell Island on some matters and Dyffryn Seaside Estate Co Limited and have been doing so since the first notification of the ACP-2019-58 circulated to Stakeholders on 13<sup>th</sup> May 2020. Since that time there have been further communications about the proposal including notification in advance of the commencement of the public consultation on 7<sup>th</sup> December and of the Open Day dates in December and several reminders that the public consultation would close on Friday January 22<sup>nd</sup>. The owners of Shell Island made time to visit us on one of the Open Days and we are disappointed the owners of Dyffryn Seaside Estate did not attend.

Unless we have misunderstood you are an active Director of the Dyffryn Seaside Estate Company Ltd and have been since 1996 and our correspondence to you was on the basis of:

Representing yourself and your father as adjacent landowner

As a Director of Dyffryn Seaside Estate Company Ltd

As an agent for Shell Island (though we did write direct to Shell Island Directors).

Regardless we did make a huge effort to contact and have meetings with as many people as possible – including Dyffryn Community Council and our contact details have been well publicised. None the less if you would like to provide the names and email addresses of your clients referenced I will write to them personally as you suggest and we would be pleased to have them on our mailing list for future communication.

Thank you again for your input.

Kind regards





## 2.2. Response Email002

### **Response from West Wales Airport Ltd to the public consultation process relating to the ACP 2019-58 application by SAC**

It is understood that the ACP application being submitted by SAC has been specifically designed to enable access to the Cardigan bay Danger Area D201. The Supporting Evidence document and the Easy Read Guide that have been produced, make many unsubstantiated statements and claims. However, the main message is clear; SAC wish to establish segregated airspace in the hope it will be the catalyst that will enable, what is referred to as a grand plan, to be pursued.

According to the ACP documents, the plan is designed to attract businesses and funding to the site once new segregated airspace has been established. West Wales Airport has first-hand experience of this speculative approach, as it mirrors the Welsh Government's failed attempt in 2004 to achieve a similar effect at ParcAberporth.

The Cardigan Bay Danger Area D201, is a well-established, highly regulated environment. When in use, it is managed by experienced agencies that have the appropriate air traffic management resources and facilities with which to do so. The area is regularly active with MoD operations, as is the adjacent West Wales Danger Area D202.

The ACP supporting documents that have been produced by SAC, do not offer any hard evidence that there is any demand for the additional segregated airspace being proposed. Neither do they indicate what air traffic management services will be established to manage it.

Segregated airspace is created to support an aviation demand, one which is both imminent and on-going. It is not created simply to be used as a commercial tool for any company or organisation to attract business and investment. If the demand for the airspace is proven and investment has been made in the necessary infrastructure and air traffic management, an application for the airspace as proposed would be far more viable.

This application is not driven by any guaranteed user demand, there are no plans to establish the required air traffic facilities, ATS capability or any agreements with an airspace sponsor such as MoD to manage it. Due to this, West Wales Airport has significant concerns regarding the potential for the mismanagement of the proposed airspace and thereby the safety of other air users. Therefore, as part of the consultation process, WWA wish to receive answers to the following questions:

- 1) How do you propose to manage the new airspace from airfield to D201 as well as the D201 DA itself, when Llanbedr has no ATS, no ANSP authority, no radar facility and no MoD approvals?
- 2) Under what CAA authority do you have to deliver BVLOS services to UA 20> kgs operating from the airfield? Do you have a CAA authorised UAS operations manual in place including all the relevant risk assessments?
- 3) Your proposed segregated airspace will be required to be a DA. How do you intend to proceed if you cannot get an agreement for both DA sponsorship and DA operations?
- 4) Do you have any support from DE&S for you to manage the D201 complex?
- 5) The CAA mandates that the flying airspace sector of D202 must be covered by radar. This requirement will no doubt also apply to the airspace being proposed by Llanbedr. As Aberporth radar is unable to see below 3,000 ft in the vicinity of Lanbedr airfield and RAF Valley cannot see it at all, are you proposing to install your own licenced radar facility and establish an ATU on-site?

1

- 6) SARG currently require that for a DACS provision alone, the minimum of a Basic Service must be provided. In a DA this service may only be supplied by an ANSP delivering a full ATC service. In addition, a deconfliction service using radar will be required in the floating sector of the proposed new DA as well as in the D201 complex. Reliance on ADS-B as you currently propose, will not be permitted for air traffic management. Therefore, how are you proposing to manage these requirements?

**Additional questions with specific reference to the information supplied in the Easy Read Guide:**

Note 3 - Of the claimed 1,000 air movements per year, how many have been unmanned? Of those, how many would be capable of operating safely BVLOS?

Note 4 – How many times has a TDA been activated since 2015 and during what period, given that any previous unmanned activities have predominantly been operated in VLOS.

Are you expecting permanent segregated airspace to be authorised even though you do not formally have any customer demand for it? Are you expecting customers to arrive to use the airspace just because it is there?

Note 5 – How do you support the claim that Llanbedr airfield is a 'National Asset' when it has no meaningful operational infrastructure? There is no ATZ, no ATS, no radar capability and no unmanned customers that are demanding new airspace in which to operate.

Note 6 – Can you quantify the amount and more importantly, the timing of the increased support that you claim the next generation of UK aerospace will need?

Note 9 – What are your usage forecasts based on, given you currently have no proven demand for the airspace? Why are you assuming 50% will be less than 150 kgs and how can you justify that 50% will be electric? On what facts are these numbers based? Also, what is the heaviest UAS you have handled to-date?

Note 11 – Llanbedr is no longer a 'candidate' for a 'Space Port', as you claim. This has been awarded to UKVL Sutherland at A'Mhoine in Scotland. Are you now planning to apply, as any airfield can, for a slice of the UK government's £2m fund that was set up to develop a horizontal launch space launch capability? If so, why would you expect to be successful with such a bid, when your main runway does not favour the prevailing wind (one of the pre-requirements for funding) and much of the money has already been taken up by other players such as Newquay and Prestwick?

What makes you believe that you will be able access MoD facilities and QinetiQ resources at Aberporth range in order to manage a horizontal launch space port, given it is fully occupied with current MoD requirements and the utilisation of D201 continues to increase?

Note 12 – On what basis do you believe a plan to build a technology campus on the airfield will be used by developers of space technology, given they do not necessarily need an airfield or airspace to conduct their development work? As previously stated, this particular concept was tried and failed at the Welsh Government owned ParcAberporth.

Note 13 – How are the employment and value numbers quoted in the EIA substantiated? Similar numbers were used along with other ill-informed assessments, when ParcAberporth was being planned. 16 years on, with £17m spent, still only 60% of the site is occupied and this level has only been achieved through the continued development of West Wales Airport.



Date: 9 December 2020

**SAC comment in response to Email002:**

Details of the direct engagement with West Wales Airport Ltd, as one of several Local Airport Operators during the consultation process are set out in Annex 1 of the Consultation Review Stage 3D Report.

The issues raised by this respondent have been considered and we believe do not impact on the airspace design being proposed and have therefore been categorised as a Category C impact.

The response contains mostly uninformed and inaccurate comment with no supporting evidence provided. The D201 ATM issues raised have been addressed as part of the broader discussion with MOD to which QinetiQ was also a party.

The below is SAC response to the respondents above email of the 09 Dec 2020.

Dear [REDACTED]

We hereby acknowledge receipt of the West Wales Airport Ltd response to the Snowdonia Aerospace ACP 2019-58 Llanbedr Danger Area. We are disappointed with the tone of your response and the obvious factual errors contained within. We can assure you there is a robust underpinning business case and that the Statement of Need and all supporting analyses have been subject to rigorous peer review by a broad team of CAA experts at each of the multiple Gateway Reviews. We can also reassure you that safety is paramount in all of our operations and we will continue to work closely with all stakeholders to ensure that this remains the case. Your input has been recorded and will be considered alongside other submissions as part of the review process prior to the full ACP submission.

Kind regards

[REDACTED]



### 3. Portal Responses

The following consultation responses were received via the consultation portal, but were too long to include in the summary spreadsheet in their entirety.

### 3.1. Response ANON-C1XX-V1X2-N

First of all, it is disappointing that the CAA seems to be allowing or even encouraging a piecemeal/uncoordinated approach to UAS BVLOS trials and the associated airspace requirements. With West Wales Airport "The Nation's Centre for Unmanned Aerial Systems Operations", Caernarfon, Warton and Skysports x 2 (Essex and Scotland) it is hard to imagine that they won't all be looking to achieve much the same ends and same data. Every UAS developer does not require their own site, surely?

All the trial sites require significant-sized TDAs which then become permanent. Surely in the limited amount of Class G airspace of the UK there is opportunity to limit further loss of Class G by combining trials and operations at far fewer sites than are current and proposed?

In this case it is gratifying to think that the airfield will remain open but at what cost? Is the 'encouragement' of the development multiple, competitive centres and the associated loss of Class G worth it? At least let us have a robust analysis of the cost:benefit analysis that permits multiple centres/TDAs/DAs.

Furthermore, the rationale behind a permanent DA rather than a Temporary one is "We have now reached the point where a request for activation of a TDA is a business limitation". Since when should a business limitation be the driver behind loss of Class G airspace. Moreover, isn't GA itself a valuable business sector, and why should it take a lower priority than this business?

The ACP suggests that the impact on GA will be minimal, and on this I make a number of comments:

1. "The majority of GA activity at and around Llanbedr occurs at the weekend and is unlikely to be affected by DA activation." Yet the proposal acknowledges that "weekend flying may be required"
2. The ACP further states "Even on weekdays, we only anticipate needing to activate the DA two days out of every five on average (approximately 100 days per year in total)," yet that is 40% of the weekdays. In addition the Proposal states that flying "will tend to be concentrated into short intensive periods and be biased more toward activities during British Summer Time (BST).", just when most GA flying takes place.
3. "Displacement of other aviation as a result of Danger Area activation is principally going to affect those aircraft wishing to overfly Llanbedr, of which 77 instances were recorded in the airfield movement log for 2019." Surely that number is only those who actually contacted Llanbedr whereas many microlight/GA pilots (like me) prefer not to use the radio despite having the licence and equipment. How many 'silent' a/c flew over and past Llanbedr during the period?
4. "Aircraft wishing to transit past Llanbedr will still be able to do so even if the DA is active.", but at what height. We Microlight/GA pilots like to see the view from lower levels than 6000ft
5. "The same capability to transit over the DA will also exist with Option #1 as the full 6000ft altitude will only be activated if required. On the estimated 36 days/year when the 6000ft maximum altitude may be in effect (i.e.10% of the year, affecting 7 overflying aircraft on average), the maximum lateral deviation from path will only be the 2.5 nautical miles required to avoid Area A." This stretches the statistics to fit the argument (deliberately so I assume), assuming that the overflights occur evenly throughout the year. Overflights are likely to occur more frequently when the weather is good - maybe 100 days - so 36 days for the 6000ft max altitude becomes a significant proportion. Moreover, the proportion of KNOWN overflights will also be correspondingly higher, perhaps also about 25.

The ACP's summary that "The Airspace Change is therefore anticipated to have a low/negligible impact on general aviation stakeholders and displacement of other aviation." is based on misleading stats and cannot be supported on the evidence provided.

Mitigation or Alterations:

The E (overland) side of the ATZ should be defined by straight lines as these are easier for GA (inc microlights) to fly and thus avoid infringements. The E extent also needs to be reduced to allow GA



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aircraft N-S transits avoiding the highest ground, again improving safety by reducing the risk of flight into terrain.

Some form of N-S corridor would be a significant enhancement to flight safety, allowing GA transits on the lower ground.

In its current form I oppose this ACP but would be prepared to change my view if improvements conducive to safe GA flying are incorporated.

**SAC comment in response to ANON-C1XX-V1X2-N:**

The issues raised by this respondent have been considered and have been categorised as a Category A impact and have resulted in a direct impact to the design of the Airspace and addressed within the now proposed revised Airspace Design being put forward.

Further details of the resultant design and the impact on General Aviation are set out within the Stage 4A Report.

SAC can also confirm that activation via NOTAM will provide 24 hours notice and that the DA will only be active for the minimum time necessary. Airfield contact details will be included in the NOTAM. Normal operating hours for novel aerospace activities will be 0900 to 1700, Monday to Friday

### 3.2. Response ANON-C1XX-V1W1-K

Dear Snowdonia Aerospace LLP,

#### FORMAL MOD RESPONSE TO ACP-2019-58 LLANBEDR DANGER AREA

The MOD would like to thank Snowdonia Aerospace for the opportunity to provide feedback on ACP-2019-58 Llanbedr Danger Area (DA) and for the open and honest discussions that have taken place so far regarding this matter.

The MOD believe that there are elements of the DA proposal that require further liaison and thought for it to be acceptable to the MOD. The concerns can be broken down into the following areas; issues affecting RAF Valley, usage of EG D201 Aberporth and ATS provision and wider MOD concerns; all of which are described in more detail below.

#### RAF Valley

RAF Valley operate the Texan T1 and Hawk T2 aircraft in the Valley Aerial Tactics Area, Valley Area of Intense Aerial Activity and Low Flying Area 7 down to 4000ft for Medium Level sorties and 250ft for Low Level sorties; laterally and vertically conflicting with the proposed DA at Llanbedr. There has been a significant increase in the amount of aircraft operating out of Valley in the last year with the initial introduction of 10 x Texan T1 and a further 4 aircraft being added to the fleet in 2021. The current flying rate plans for 80 fast jet sorties per day, increasing to 96 sorties per day by 2022/2023. Valley aircraft routinely operate in the same geographical area as the proposed DA on a daily basis (usually weekdays) between 0800 and 1845/2000 (depending on the time of year). There is an obvious conflict with the proposed DA, in particular when it is activated to 6000ft, impacting all Valley sortie profiles in that area.

To ensure that the airspace is utilised as effectively as possible whilst mitigating the impact to a key Defence task, the MOD believe that Snowdonia Aerospace should consider creation of a Letter of Agreement detailing the requirement for taking part in regular planning meetings and mutually agreed time and/or height deconfliction of airspace use, to alleviate any potential conflicts and issues.

Whilst the MOD appreciates that a corridor from surface to 2000ft underneath Area D would allow aircraft to pass underneath the activated DA, it should be noted that Valley aircraft require to transit closer to the coastline than Area D. Therefore, the MOD would like to continue discussing the possibility of extending the low-level corridor into Areas B and C when activated to 6000ft.

#### EG D201 Aberporth

The MOD would like to inform Snowdonia Aerospace that they would require a Letter of Agreement in place through DE&S and SO1 DAAM to be able to access D201 and utilise ATM services that are subcontracted to other partners within D201 airspace (such as QinetiQ). D201 is a MOD asset and therefore any commercial activity requests would be subject to a priority system determined by planned activity, as well as short or no-notice utilisation by the MOD which may impact on any planned usage by Snowdonia Aerospace. Weekend opportunities for Snowdonia Aerospace to utilise D201 with another ATM service provider may be a viable option, again requiring formal agreements with the relevant area of the MOD.

The MOD would like to understand how Snowdonia Aerospace plan to provide an ATS, DACS or radar monitoring to any RPAS transiting to D201 through the 'floating airspace' i.e. current Area D and any potential changes to the design options such as a corridor underneath Area C. In previous MOD ACPs the CAA have mandated that radar monitoring, or a Deconfliction Service, is provided to air systems within the floating airspace. ATM provision in Areas C and D could be available to Snowdonia Aerospace through a formal agreement with the MOD. However, this may require testing of the current equipment and radar coverage to ensure it meets requirements for ATS provision in that area.

GA and other low-level military traffic will be funnelled when Llanbedr and other DAs in the vicinity are active, which may lead to an increased risk of inadvertent penetrations of D201, or force aircraft to fly towards the high ground inland from Llanbedr. The MOD believe that Snowdonia Aerospace should



look into potential protocols determining which areas could be left inactive when larger portions of the airspace are activated, especially if Area C was to remain without a corridor below it for aircraft transiting close to the coastline.

#### Generic MOD Comments

The MOD are aware that a DACS will not be provided by the FISOs at Llanbedr; however, we understand that a DAAIS will be provided. The MOD note that a DAAIS does not provide a clearance to cross an active DA. However, there may be instances where MOD aircraft require access through the DA for national security, or other operational reasons. Information on how to contact the Llanbedr FISO via landline communications as well as a relevant frequency would be required for these instances, both in the AIP and by NOTAM, or other relevant notification processes. The chances of this occurring are small; however, it is a possibility that the DA operator should be aware of.

If usage of the DA increases from the figures quoted in the consultation document, the MOD believe that Snowdonia Aerospace should review the requirement for provision of a DACS. This would help alleviate the further congestion and funnelling issues that may be caused by increased DA activation. Both airspace design options lead to potential funnelling of GA and military aircraft, thus increasing the risk of AIRPROX or Mid-Air Collision (MAC) in that area. However, Option 2 is the favoured option of the MOD as the DA dimensions cover a smaller area and allow safer and more efficient use of the airspace for all users, both within, and outside of, the DA.

RAF(U) Swanwick are an ATS provider in that area and due to the constraints of the equipment provided by NATS, radar mapping is only updated on a quarterly basis in line with an AIRAC cycle. Therefore, they require a longer than normal lead in time of between 3 and 5 months to accurately depict the DA in their surveillance displays. We would be grateful if Snowdonia Aerospace could bear this in mind when confirming and promulgating DA coordinates.

Please do not hesitate to contact the undersigned if further information or discussion is required. The MOD look forward to continuing the working relationship with Snowdonia Aerospace on this ACP.

#### **SAC comment in response to ANON-C1XX-V1W1-K:**

Details of the direct engagement with the MOD during the consultation process are set out in Annex 1 of the Consultation Review Stage 3D Report and the further below emails also between ourselves and the MOD and QinetiQ illustrate a consistent and proactive approach to direct stakeholder engagement with them throughout the consultation period.

The issues raised by this respondent have been considered and have been categorised as a Category A impact and have resulted in a direct impact to the design of the Airspace and addressed within the now proposed revised Airspace Design being put forward.

To address this SAC have now refined the original proposed boundaries of the sub-divisions of our earlier design Option 2 and have both modified the extent of Areas A, E and F to allow for easier GA transit north-south to the east of the airfield and also modified the extent of Areas C and D.

We believe that the two main changes to the airspace design will significantly mitigate this issue raised by (i) creating a corridor for GA aircraft to stay to the east of the airfield for the majority of the time that the DA is active without having to fly towards high ground, and (ii) lengthening Area D from 4 to 5 nautical miles to increase the buffer to D201 and also reduce the potential for funnelling. Addressing (i) will also benefit item (ii) because making it easier for GA to pass to the east of the airfield will obviate the need for them to divert far out to the west and thereby leave this area clear for military aircraft to transit over / under the Llanbedr DA corridor or through the gap between the Llanbedr DA and D201.

With regard training operations from RAF Valley, SAC can reconfirm that a Letter of Agreement will be produced detailing our commitment to take part in regular planning meetings and mutually agreed time and / or height deconfliction of airspace use, to alleviate any potential conflicts and issues and ensure that the airspace is utilised as effectively as possible whilst mitigating the impact to a key Defence task.



COMMERCIAL-IN-CONFIDENCE

Likewise, SAC can also reconfirm that it will put in place a Letter of Agreement through DE&S and SO1 DAAM to be able to access D201 and utilise ATM services that are subcontracted to other partners within the D201 airspace.

To further address the issues raised and as a direct consequence to the MOD's response as part of the consultation SAC can also reconfirm that:

- a Danger Area Activity Information Service (DAAIS) will be provided by the Flight Information Service Officer (FISO) at Llanbedr Airfield
- activation via Notice to Airmen (NOTAM) will be provided 24 hours in advance and the DA will only be active for the minimum time necessary. Airfield contact details will be included in the NOTAM.
- Priority will be given to MOD aircraft requiring access through the DA for national security reasons and the same priority will also be afforded to all emergency services aviation..

We believe these changes and clarifications, which are as a direct impact to responding to issues raised during the consultation, further reinforces our earlier assessment that the Airspace Change is anticipated to have a low to negligible impact on military aviation operations.

The below represent the extent of further emails received from the MOD and QinetiQ prior to and post the various direct engagement meetings which took place between the parties as outlined in greater detail in Annex 1 to Stgae 3D Report.

**From:** [REDACTED]  
**Sent:** 09 December 2020 14:15  
**To:** [REDACTED]  
**Cc:** [REDACTED] >  
**Subject:** 20201209-Llanbedr ACP-Use of D201 Aberporth Range and ATS Provision

Good [REDACTED],

Hope you are both well?

Thanks once again for the invite to yesterday's Teams mtg, it was nice to meet you (virtually).

Following the meeting I believe there are a few areas of concern that the MOD will have comments on in our formal response to your consultation. Rather than leave them until the third week of Jan 21, I think it is worth continuing discussions between SAC and the relevant areas of the MOD prior to the submission date.

Firstly, a meeting with RAF Valley will be advantageous, and they, or I, will be in touch to discuss factors that affect their operations.

Secondly, there will be other airspace users that are impacted by the proposed DA. I will collate these responses and if there are any issues that require discussion outside of the other two topics listed here then I will be in touch.

**Thirdly, and probably the most pressing need for engagement, is the utilisation of EGD201 and ATS provision.** I have discussed this with the MOD DAAM and QinetiQ (QQ) Staff and they inform me that a formal approach in respect to this ACP has not yet been made. I would therefore advise you to make contact with [REDACTED] who can be your initial points of contact regarding ATM and Range Operations (cc'd above). Any requests can then be forwarded as required within QQ/MOD.

COMMERCIAL-IN-CONFIDENCE

In all three cases, the only formal submission from the MOD will come from DAATM and it will collate the views and progress of any discussions for the entirety of the MOD by the consultation deadline. We are cognisant of the fact that there will likely be further work required, post consultation deadline.

Please feel free to contact me if you require any further information, comment or a contact from other MOD personnel/departments.

Regards

[REDACTED]

[REDACTED]

Sent: 11 December 2020 13:53

To: [REDACTED]

Cc: [REDACTED]

Subject: 20201209-Llanbedr ACP-Use of D201 Aberporth Range and ATS Provision

[REDACTED], thanks for copying me in.

In the first instance you need to write formally to the DAA through me as DAAM for the attention of [REDACTED], requesting use of the MOD (DE&S sponsored) airspace. In consultation with the DAA I can then hopefully offer the booking protocols for agreement, as with other users.

Re the ATS provision. This would be a commercial agreement with either MOD Aberporth or WWR (WWA) or both and would need to be completed once you have DE&S DAA approval for use of the Airspace. I am presuming, in line with current regulation and CAA direction, that systems will require a DS in the floating airspace en-route 201 and ATS in 201 (BS or above) but this is for the CAA to stipulate in their decision letter.

End result would probably be an LOA between all parties re use, as currently held between the MOD and WWA, although this is dependent on the amount of use required as 20 days is not extensive and the CAA cannot direct the MOD to enter into an LOA!

Prioritisation of commercial activity sits well down the priority list with all MOD activity or MOD related activity ahead of it but the booking process allows for fair use.

[REDACTED]

[REDACTED]

From: [REDACTED]

Sent: 22 December 2020 12:06

To: Danger Area - Snowdonia Aerospace <[da.acp@snowdoniaaerospace.com](mailto:da.acp@snowdoniaaerospace.com)>; [REDACTED]



[REDACTED]  
Cc: [REDACTED]

**Subject:** UC RE: 20201209-Llanbedr ACP-Use of D201 Aberporth Range and ATS Provision

Thanks for copying me in [REDACTED], and I trust you are keeping well,

As you know, [REDACTED] called me last week for an informal discussion on the topic, with the end result being that you would seek an opportunity for us all to further discuss in the New Year (as alluded to in your email below), which I believe would be very beneficial to ensure we are all aligned.

To that end, I would just like to clarify the position on QinetiQ enabled ATS provision, as I believe it cuts across two separate aspects, each of which require separate consideration in their own right, and thereby a little more explanation over and above statements on financial charges?

In regard to the SAC ACP airspace (abutting up to the existing EGD201 Danger Area complex boundary), I believe it to be your responsibility to describe and emplace safe airspace management service within the airspace being requested under the ACP. That service could be enabled though a number of ways at your discretion, but if requested of QinetiQ, will be subject to TEST approval (as the MOD owners of the GFX equipment we currently utilise to provide the service), and would be subject to separate contract, financial arrangements and specific LOA's etc. However, if not requested of QinetiQ, the only LOA which would still be of benefit in my opinion would be to detail the adjacent airspace operators and the means by which respective operations along adjoining boundaries might be managed (buffers?), communication protocols and actions in the event of emergencies etc.

However, should you require a specific operation to cross the boundary and operate within the EGD201 complex, there would be need for separate agreements, approvals, process and procedure to be enabled under specific contractual arrangements for the nature and duration of that specific activity, for which I would envisage handover procedures for accepting and return of the operation between SAC enabled airspace (and it's ATM provider) and existing MOD Danger Area airspace (currently enabled through QinetiQ and our contracted NATS ATM provider). This would be dependent upon TEST and DAAM approval as the Danger Area Sponsor and Manager, for which a process already exists and can be managed by QinetiQ.

Happy to further discuss and just wanted to add a little clarification prior to our discussion in the New Year.

Wishing you all a safe and Merry Christmas and a Happy and Prosperous 2021 - whatever challenges and opportunities await...

Kind Regards,

[REDACTED]

[REDACTED]

[www.QinetiQ.com](http://www.QinetiQ.com)

### 3.3. Response ANON-C1XX-V1XV-S

For attention of [REDACTED]

Aerospace Change  
Snowdonia Aerospace Centre  
Llanbedr  
Gwynedd  
LL45 2PX

Sent by email to [da.acp@snowdoniaaerospace.com](mailto:da.acp@snowdoniaaerospace.com) and  
[REDACTED]

22 January 2021

Dear [REDACTED]

#### Response to consultation on Llanbedr airspace Danger Area proposal

Thanks again for meeting me and Julian Pitt via zoom on 13 January to discuss this proposal.

The Snowdonia Society has today responded to this consultation via the CAA online consultation portal.

I thought it would be helpful to provide you with the text of our response, appended overleaf, which has been inserted into the relevant response boxes on the portal. In summary, the Society objects to both Options as proposed. Our response explains why, but also how we would like to see either Option amended so that we can withdraw our objections.

This covering letter gives me the opportunity to underline the Society's basic concern by a simple analogy with the planning system. The DA, as proposed, is like someone assuring their neighbour that they want to build a house next door that will be inconspicuous and well designed to fit its surroundings - but that nevertheless they have applied for permission to construct a building of any design and unlimited size.

We have no doubt about SAC's sincerity and are sure that SAC's knowledge of its future customers is as complete as it could be. However, medium to longer term our concern is that the DA designation could be exploited in different and environmentally damaging ways by other potential airfield users - and also new site owners if the Airfield were to be sold on by SAC / Welsh Government with DA designation reflected in the valuation. It is these uncertainties that our response seeks to deal with. We have no wish to hamper the types and frequency of DA use that SAC envisages in the next few years.



Cymdeithas Eryri  
Snowdonia Society

📍 Caban, Yr Hen Ysgol, Brynrefail,  
Caernarfon, Gwynedd LL55 3NR

☎ 01286 685 498

✉ [info@snowdonia-society.org.uk](mailto:info@snowdonia-society.org.uk)

🌐 [www.snowdonia-society.org.uk](http://www.snowdonia-society.org.uk)  
[www.cymdeithas-eryri.org.uk](http://www.cymdeithas-eryri.org.uk)

Cymdeithas Eryri the Snowdonia Society  
1967 - 2017

Yn gwarchod, gwella a dathlu Eryri ers 50 mlynedd - Protecting, enhancing and celebrating Snowdonia for 50 years

Elusen gofrestrdedig/ihif/Registered Charity no: 1155401

For both options we are concerned that consultation has proceeded without publication of a legislation-compliant Environmental Impact Assessment and a screening report on whether a Habitats Assessment is needed. If you have not already done so, we suggest that you contact Natural Resources Wales about this matter.

I am copying this letter to the Director of Planning and Land Management at the Snowdonia National Park Authority, the Meirionnydd Environment Team leader at NRW and Llanbedr Community Council.

Yours sincerely



Director, Cymdeithas Eryri Snowdonia Society



## Llanbedr airspace Danger Zone proposal

### Full Text of Consultation Response from Snowdonia Society

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

The Snowdonia Society is a registered charity established in 1967, which for over 50 years has contributed to the work of caring for and protecting Snowdonia. The Society's charitable purpose is to protect and enhance the beauty and special qualities of Snowdonia and to promote their enjoyment in the interests of all who live in, work in or visit the area both now and in the future.

We object to both options, for the reasons below, unless they are altered in ways which address our concerns; we suggest potential changes under heading 11.

(There appears to be a glitch in the CAA webpage at Section 9 above, as we could not indicate 'strongly object' to BOTH options. We strongly object to both, if unamended)

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

Not applicable.

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

##### What we object to

Option 1: We object to inclusion within the Danger Area (DA) of the inshore part of Area B, covering the same airspace as Area E in its entirety in Option 2.

Option 2: We object to inclusion within the DA of Area E2 (2,000 to 6,000 ft) and also E1 (ground to 2000 ft) in so far as there is any scope for activity in E1 when Area E as a whole is activated, despite E1 being described as outside the DA. (See fourth bullet in para 4 below.)

##### Why do you oppose?

1. Tranquillity is one of the special features of all national parks, but in recent decades much of Snowdonia has become noisier for many reasons, detracting significantly from the Park's value for quiet outdoor recreation. The Rhinog mountains are renowned as far and away the wildest, least spoilt, and most tranquil parts of the National Park, notwithstanding the impacts of the activities of military jets. This lofty upland expanse



is a 'jewel in the crown', the protection of which from actual and potential threats is of highest priority for the Snowdonia Society.

2. This airspace change proposal follows on from the decision to allocate Llanbedr Airfield as part of the 'Snowdonia Enterprise Zone' in the National Park Local Development Plan (LDP) and the range of land uses now permitted in principle there. However, the introduction to LDP Policy 27 at para 6.26 states only that:

'The Welsh Government Designation at Llanbedr Airfield extends to 227.8 hectare (562 acre) Llanbedr Airfield. Now re-branded as the Snowdonia Aerospace Centre, the site was a former Ministry of Defence owned site. The airfield has three runways of 2.3km, 1.4km and 1.3km providing access to 7,100km<sup>2</sup> of segregated airspace **over Cardigan Bay** [our emphasis]. The simultaneous access by both civil and military systems to this significant area of segregated airspace is unique to any airfield in the UK and is the first of its kind in Europe.'
3. There is no mention there of using airspace inland over the Rhinog mountains for testing, demonstration or training in relation to emerging aviation technologies. Yet the relatively recent SAC consultation documents refer to Area E as providing '*an extended area for upland/mountain operational testing*' and SAC has explained that including upland as well as lowland in the DA adds to the '*richness of [testing] environment*'. These intentions were not in the public domain when the LDP was formulated.
4. SAC has sought to assure the Society that DA designation will not lead to any significant environmental harm to the conservation and public enjoyment of the special qualities of the Rhinogs, notably the land area and its biodiversity including birds under Area E in Option 2 and the corresponding part of Area B in Option 1). In particular SAC has emphasised that:
  - Based on knowledge of existing and upcoming users of the existing temporary DA, Area E encompassing part of the Rhinog mountains (and corresponding part of Area B in Option 1) will only experience about **6** days of Danger Area activation each year, with almost all activity being higher than 2,000 ft above sea level.
  - Area E1, from ground level to 2,000 ft is proposed '*to remain outside of the DA to keep experimental aircraft clear of the Rhinog mountains.*'
  - Even on the 6 days, flying time would be likely limited to a few hours sandwiched between preparation and after-landing activities.
  - Flying in area E1 is 'unlikely', albeit not entirely excluded. There is a 'twin lock' on flying here, as CAA permission would be needed to activate E1 on a case by case basis depending, for example on the assessed safety of experimental designs.
  - The types of unmanned and experimental aircraft now being operated are very quiet. The noise impact flying at 300 metres above ground level would be not much more than the 45 - 50 dB typical ambient noise' range for rural areas.
  - The noise scale is logarithmic and there is about a 6 dB drop per 100 metres - most flights will be far above most of the mountain landform and so inaudible to people on the ground.

- SAC can ask operators to avoid flying above any particularly sensitive areas altogether, if notified where those areas are.
  - When the DA is not activated, 'normal' civilian and military aircraft can use this airspace. Thus activation displaces such noise to elsewhere.
5. Section 5.5 of the Options consultation document concludes that *'the Airspace Change is anticipated to have a very low / negligible impact on tranquillity'*.
6. We broadly accept this assessment in the short term, as SAC's assessment of its business growth may well turn out to be overly-optimistic. We refer to the report for Welsh Government entitled *Enterprise Zones – Boldly Going* issued in May 2018, which states at para 5 of the Summary that:
- '... the Committee also heard from the Chair of the Snowdonia Enterprise Zone Board that they had realised very early on that, given the challenges faced in their zone, they were never likely to be able to deliver significant impacts in terms of growth or jobs, at least in the short to medium term. Instead, their focus shifted to exploring the opportunities for the long term development of the zone.'
7. This extract does not distinguish between the Llanbedr and Trawsfynydd sites of the Snowdonia EZ and we appreciate that its conclusions are nearly 3 years old. However the economic outlook has darkened since 2018, not least for the aerospace sector.
8. We query SAC's assessment that the Airspace Change proposal would necessarily have a *very low / negligible impact on tranquillity* in the medium to longer term for the following reasons:
- Looking beyond the next few years, it is not possible for SAC to forecast with confidence which customers may want to locate and grow at Llanbedr Airfield in the medium to longer term, nor how they will want to use different parts of the DA, depending on their particular business needs. One plausible scenario is that a major international company or partnership will wish to set up on the Airfield an advanced avionics R&D, testing and customer demonstration / training centre, and that **overland** flying in the DA would be a major focus for their intentions. We have studied the relevant land use policy in the National Park Local Development Plan (Policy 27) and this seems to allow for the likely ground development including uses that are 'ancillary' to *'employment use (B1, B2, B8) and other uses associated with research and development (including aviation and aerospace industries'*. Consequently it is entirely reasonable to think that in the medium to longer term the DA Zone E could be activated for a greater number of days each year.
  - We are doubtful that 'typical' ambient noise in rural areas is an adequate baseline with which to compare flight noise. The tranquillity of the Rhinogs is a unique experience and especially on calm days even very low levels of noise could be highly intrusive, especially on the higher ground. The base of E2 is 2,000 ft above sea level, therefore allowing flights close to ground level of the higher mountain summits in Area E.
  - Aerospace prototype designs change as R&D moves on. Noisier prototypes might become important, and testing / training programmes may involve protracted flights.



- Flights would be concentrated in spring / summer / autumn when weather is reasonably good. This is when the Rhinog area is most valuable as a resource for quiet outdoor recreation, and is the period when rare and protected bird species are nesting – in locations that for purposes of species protection will not be widely known.
  - Displaced aircraft noise when the DA is activated would in large part occur elsewhere in the National Park. This is a 'zero sum' issue rather than a benefit of the DA proposal.
  - There are few DAs in the UK open or opening up for commercial R&D testing. This highlights the potential at Llanbedr, assuming it gets a permanent DA, for a development growth scenario as outlined above which could lead to significantly exceeding the 6 days per year usage currently predicted by SAC.
  - Finally, the issue of visual intrusion could also become important. A few experimental flights on about 6 days a year could indeed have novelty interest to visitors and local residents. However, that would not be the case if area E were used routinely on many days a year.
9. For all the above reasons, we object to both airspace change Options as currently proposed, on the grounds that in the medium to long term, without any further controls or constraints being imposed, either Option could lead to significant harm to public enjoyment of the Rhinog mountain area.
10. A related concern is that consultation seems to have proceeded without publication of a legislation-compliant Environmental Impact Assessment and a screening report on whether a Habitats Assessment is needed. With four Special Areas of Conservation, a National Nature Reserve and a Special Protection Area all in close proximity, and without adequate assessment, the proposals could lead to irreparable harm to the natural environment including protected species. The DA designation process may also be vulnerable to a legal challenge if due process has not been followed.

#### Mitigation or Alterations

11. SAC has drawn our attention to Stage 7: 'Post Implementation Review' in CAA's Airspace Change Guidance (CAP 1616, at [CAP1616 Airspace Change Ed 3 Jan2020 interactive.pdf \(caa.co.uk\)](#) ) as a means to resolve problematic impacts on the National Park arising from the DA. These reviews can lead to CAA requiring a wholly new airspace change proposal to be taken forward. Such reviews are undertaken once, usually about 12 months after implementation. However the risks and potential for harmful impacts that we are concerned about in Area E are likely to be several years away from now. Moreover, these reviews appear to be intended primarily to address matters within CAA's core technical competencies. They do not appear suited to dealing with complex environmental impacts in nationally protected areas, regarding some of which one would expect Natural Resources Wales to be the lead public body. Consequently we are not satisfied that Post Implementation Review by the CAA can address our concerns.



12. The consultation document refers to 'letters of agreement' with local communities - and presumably with bodies such as the National Park Authority - in order to secure conditions on detailed operational matters in the DA. However such agreements will lack legal force or realistic enforcement mechanisms.
13. From the Snowdonia Society's perspective, Option 2 appears to be more readily modified than Option 1 in order to address our concerns and overcome our objection. If Option 2 is taken forward, we would want the proposal submitted to the CAA to stipulate two binding conditions of DA designation, being:
  - (a) that Area E is activated no more than a maximum of 10 days each year. This would provide some extra days over and above SAC's forecast of Area E usage, in recognition that no forecast can be precise;AND:
  - (b) that the airfield operator submits a short report to CAA each year, copied to the Snowdonia National Park Authority, recording the dates and total number of days on which Area E was activated in each year and describing what activity took place on those days.
14. If the Llanbedr Airport operator/owner wishes to increase the number of days when DA Area E can be activated, then it will be open to them to make a fresh Airspace Change Application to the CAA to achieve this. That application would be assessed on the basis of the information provided, including full impact appraisal and an explanation why demand for use of DA Area E has changed compared with SAC's current assessment.
15. Given that SAC has expressed confidence that Area E will not need to be activated more than about 6 days a year, we think our proposed condition (a) is reasonable and will not hinder currently foreseeable business expansion at the airfield. Condition (b) is not onerous.
16. **SAC cannot have it both ways; if they are concerned that condition (a) might turn out to constrain medium to long term business growth, then that implies there is significant uncertainty about the types & frequency of activities that future Airfield customers may want to undertake in DA Area E. Such uncertainty justifies a precautionary approach under which a second DA application would be required if circumstances change from those currently envisaged by SAC.**
17. If Option 1 is taken forward, in which there is no sub-division within Area B, then the most obvious way to address our concerns would be to alter Area B to **exclude** airspace Area E (E1 and E2) as it appears in Option 2.

*Call-in by the Secretary of State (Westminster, not Welsh Government)*

18. If the proposal taken forward does not address the Society's concerns, then we will consider asking the Secretary of State to call-in the proposal for his/her determination.
19. In considering whether to call in, the Secretary of State has wide discretion and a statutory duty, as do all public bodies including the CAA, when undertaking any activity which may have an impact on the designated area of a National Park, to have regard to the statutory purposes of National Parks. These are to '*conserve and enhance the*

*natural beauty, wildlife and cultural heritage of the area' and 'promote opportunities for the public understanding and enjoyment of the special qualities of the parks'. END*

**SAC response to ANON-C1XX-V1XV-S:**

The issues raised by this respondent have been considered and we believe do not impact on the airspace design being proposed and have therefore been categorised as a Category C impact.

We met with the Snowdonia Society on one of the consultation Open Days at the airfield and again via video meeting shortly after on the 13 January 2021 (Copies of the Minutes to that Meeting are included in Annex 1). On both occasions we addressed all of the issues they raised and emphasised the multi-layer approach that we will adopt to minimise any impact: (1) a very small number of days when the DA will be activated over land, (2) sorties to be kept as short as possible on those days, (3) operating height to be assessed to minimise residual noise above daytime rural ambient, and (4) avoiding all together any site that is identified as being sensitive. We are confident that this is a sensible and sufficient mitigation.

### 3.4. Response ANON-C1XX-V1CS-1

I would support this proposal Option 2 on Condition of:

The establishment of a permanent corridor for existing GA flight through the proposed restricted airspace to the East of the airfield.

Given:

1 the proximity of the Cambrian Mountains and the popularity of the West Coast of Wales with microlight and Light Aircraft which do not have the option to fly IMC

2 the rapidly changing low level maritime weather changes that occur on this prevailing coastline

3 the risk of conflict with our two long established neighbouring airfields of Talybont and Peniarth only 12 miles distant

4 Drone operations already occur on a regular basis at the above airfields where there is a newly formed Club (DVD)

5 No formal allowance for the above has yet been made, but see below

Mitigation or Alterations:

In principle there is no objection to the re-opening of Llanbedr airport. The concern is that by proposing to join with the existing D201/2/3 Danger Areas some 6,500 square kilometres of our Welsh Coast will be a Flight Exclusion/Restriction Zone. I comment from my personal experience of the way that the existence of West Wales Airport (Aberporth) already excludes General Aviation travelling between North and South Wales. I would like to put on record that the long term effects this proposed mobility sterilisation will place on the future economy of Wales needs to be carefully considered. With Technology advancing so fast and remote working being forced on our population by the pandemic, any short term local gains may be just that - short term. As a simple example, the pilots flying Reaper drones are 3-6,000 miles from their aircraft. Wales should not give up control of its own airspace without very careful consideration of the future impact such a loss would visit on its people.

#### **SAC response to ANON-C1XX-V1CS-1:**

The issues raised by this respondent have been considered and have been categorised as a Category A impact and have resulted in a direct impact to the design of the Airspace and addressed within the now proposed revised Airspace Design being put forward.

Further details of the resultant design and the impact on General Aviation are set out within Stage 4A Report.

SAC can also confirm that activation via NOTAM will provide 24 hours notice and the DA will only be active for the minimum time necessary. Airfield contact details will be included in the NOTAM. Normal operating hours for novel aerospace activities will be 0900 to 1700, Monday to Friday



### 3.5. Response ANON-C1XX-V1WP-J

We have put 'no comment' as an answer to question 8 and also have a neutral view on the two options presented as we would need to fully understand and further clarification about what this means regarding potential impacts on the National Park and some key issues such as noise pollution, impact on tranquillity, visual impacts, World Heritage Site setting and so on.

In terms of noise pollution, it is noted that 66% of the noise profile will be below the ambient daytime baseline, but that 33% of the noise profile would be 'unlikely' to be noticeably different. Appreciate there is a breakdown of this on page 31 of the document and that no complaints were received due to the temporary danger area but perhaps some more clarification or further studies on this would be valuable as you conclude that the 'analysis is very simplified and will be subject to some inaccuracy'.

Linked to noise pollution (and other factors), there is potential for an impact on the Special Quality of 'Tranquillity and Solitude' of Snowdonia National Park which was one of the reasons for its designation as a National Park in 1951. It is noted in your documents that there is confidence that the airspace change will have a very low/negligible impact on tranquillity, however similar to the issues around noise pollution perhaps it would be valuable to have a standalone study on any potential impact on tranquillity?

Current Tranquillity measurements place noise pollution, visual intrusion and light pollution all at a high negative weighting. A natural tranquillity assessment would be beneficial to any change of use in this space. There will be a potential effect on the amenity of local residents and visitors, including their ability for quiet enjoyment, particularly as it is noted that most of the danger area use would be during the summer time (for obvious reasons of better weather, but which is also peak time for visitors and tourism as well e.g. Shell Island). Appreciate that the document notes that there would only be limited over-land operation which would aid in limiting any negative effects on tranquillity.

There is reference to air traffic in Llanbedr Aerodrome usually operating between 0900 and 1700, but that there would be some requirement to operate e.g. early evenings. It will be important to consider the potential impact on Dark Skies Reserve status of this area and the associated Pen Llŷn a'r Sarnau which has the statutory designation Special Area of Conservation (SAC), should developments increase light pollution. The Meirionydd Oakwoods and Bat Sites, which is also a SAC is also in very close proximity to the airfield site.

The air traffic and a permanent 'Danger Area' could also have potential impact on air pollution, biodiversity and protected species in the area, particularly if the current proposals lead to increased buildings/runway/technology needed on site.

With regards to biodiversity, we appreciate that you note that you have been in contact with NRW regarding this aspect and that you have commissioned an Ecological Impact Assessment for the site in order to look at providing a baseline assessment of the ecological value and constraints of the site. It would be something that the National Park would like to be informed of in addition to NRW.

Pen Llŷn a'r Sarnau Special Area of Conservation is also a marine protected area and change in use of air space over this area would have a significant impact on marine activity. This is a huge site made up of Pen Llyn (the Llyn peninsula) to the north and the Sarnau reefs to the south, as well as the large estuaries along the coast of Meirionnydd and north Ceredigion – in total it covers 230km of coastline.

Whilst Harlech Castle is 7km away, its designation as a World Heritage site should be fully considered.

Additionally, it seems unclear about what kind of aircraft or drones will be using this Danger Area. Some of the uses of the 'Danger Area' may require planning permission to actually use the aerodrome, and these comments are provided without prejudice to any future planning decisions on the site.

#### **SAC response to ANON-C1XX-V1WP-J:**

The issues raised by this respondent have been considered and we believe do not impact directly on the airspace design being proposed however we have categorised this response as a Category B

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impact as the matters raised will be addressed as part of the holistic considerations for subsequent implementation and operation of the DA.

We believe all matters raised have been considered and addressed in greater detail in the Stage 3D Report and the Stage 4A Phase III Full Options Appraisal and are easily mitigated and manageable.

SAC will continue to work to with other stakeholders to coordinate activities and minimise disruption or nuisance as far as is reasonably practicable.



### 3.6. Response ANON-C1XX-V1CD-J

*Cyngor Gwynedd yw'r awdurdod unedol ar gyfer yr ardal sydd yn cynnwys safle Maes Awyr Llanbedr.*

*Mae gan y Cyngor ddiddordeb hir sefydlog yn y Maes Awyr fel safle gyda'r gallu i ddatblygu cyfleoedd gwerth uwch o fewn ardal sydd yn wynebu heriau economaidd sylweddol. Yn hyn o beth rydym wedi gweithio'n agos gydag Awyrofod Eryri i ymchwilio i a datblygu cynnig y Maes Awyr ac i wireddu ei botensial, o ran dynodiad y safle yn Barth Menter gan Lywodraeth Cymru a gwella'r isadeiledd o fewn ac yn gwasanaethu'r safle, yn fwyaf arbennig.*

*Yn unol â'r uchod, mae'r Cyngor yn cydnabod fod datblygu'r isadeiledd rheolaethol hefyd yn allweddol i uchafu budd economaidd posibl Maes Awyr Llanbedr ac mae'r Cyngor, felly, yn cefnogi Cynnig Newid Gofod Awyr Awyrofod Eryri i sefydlu gofod awyr parhaol yn, ac o amgylch, Canolfan Awyrofod Eryri yn Llanbedr.*

*Nid oes gan y Cyngor farn benodol ar y cynigion ac yn dewis Opsiwn 1 uchod gan nid yw'n caniatáu i ni glicio ar Support ar gyfer y ddau Opsiwn, ond yn nodi'r gofyn i sicrhau fod potensial economaidd Maes Awyr Llanbedr i elwa Gwynedd - ar gymunedau sy'n lleol i'r safle yn arbennig - yn cael ei uchafu tra bod unrhyw aflonyddwch i'r cyffiniau lleol, a'r ardal yn ehangach, yn cael eu hisafu. Hoffwn hefyd ategu ein dymuniad i barhau i weithio gyda Chanolfan Awyrofod Eryri a phartneriaid eraill i wireddu'r nodau hyn.*

Gwynedd Council is the unitary authority for the area which includes the Llanbedr Airfield site.

The Council has a long-standing interest in the Airfield as a site with potential to generate high value opportunities in an area facing significant economic challenges. As such, we have worked closely with Snowdonia Aerospace to explore and develop the Airfield's offering and realise its potential; most notably in the designation of the Airfield as an Enterprise Zone by the Welsh Government and developing the infrastructure within and servicing the site.

In line with the above, the Council recognises that developing the regulatory infrastructure to maximise the economic potential of Llanbedr Airfield is also critical and the Council, therefore, supports the Snowdonia Aerospace Airspace Change Proposal to create a permanent airspace at and around the Snowdonia Aerospace Centre at Llanbedr.

The Council does not have a specific preference regarding the options proposed and have only chosen Option 1 as it would not allow us to click on Support for both Options other than to note the requirement to maximise the economic potential of the Airfield for the benefit of Gwynedd - and the communities local to the site in particular - whilst minimising any potential disruption to the locality and the surrounding area from the Airfield's operation. We would also reiterate our desire to continue to work with Snowdonia Aerospace Centre and other partners to realise these goals..

#### **SAC response to ANON-C1XX-V1CD-J:**

The issues raised by this respondent have been considered and we believe do not impact on the airspace design being proposed and have therefore been categorised as a Category C impact.

SAC will continue work to with all stakeholders to coordinate activities and minimise disruption or nuisance as far as is reasonably practicable in parallel with seeking to generate economic activity and job creation.



## Response ANON-C1XX-V1CV-4

### 1. Executive Summary

The Glyn Estate does not support Snowdonia Aerospace's Airspace Change Proposal, reference ACP-2019-58, in either form of the current design proposals. The proposal, as a whole, appears illogical and there is no reasonable justification for the need of change from the current Temporary Danger Area (TDA) that was previously consulted on in 2014 (activated via a Notice to Airmen (NOTAM)). The proposal is in direct conflict with the region and local area's main economic drivers being tourism, leisure, agriculture and the conservation of the Area of Outstanding National Beauty that is the Snowdonia National Park.

Increased establishment of Snowdonia Aerospace's activities will intensify a range of detriments to the region and restrict or adversely impact upon the key economic development areas listed above.

Justification includes the project contributing to economic growth, including job creation, but this does not adequately demonstrate that a specialist industry, such as this, will do this for the true benefit of the local area and local people.

Therefore, any intensification of the project through permanence or expansion of the Danger Area will attempt to support an unproven business that will not provide local benefit and directly challenge the other key drivers of the region that must be backed to generate true economic growth in ways that are in harmony with the great landscape and local environment.

### 2. Questionable Economic Suitability

The need for a change to a permanent Danger Area appears to be fundamentally founded on the realisation of a hypothetical long-term masterplan for the Llanbedr Airfield that is argued could contribute up to '515 jobs and £19.5million per year to the local economy.'\* It is very unclear as to whether, if any, of these jobs will benefit or be available to local people. Given the clear growth of the Tourism and Leisure industry in Harlech, Gwynedd and the Snowdonia National Park, and the continued prevalence of a strong agricultural community and industry in these areas; no action should be taken to compromise the employment sectors that are relied upon by local communities. It is also not made clear whether jobs that are created can be filled by local people or if others will need to come into the area/be based on site to fulfil the roles. Without strong evidence that the airspace change proposal would genuinely advantage local people through suitable jobs and infrastructure, then the justification for the permanence as a precursor to a greater project is not demonstrated.

### 3. Disadvantaging the Growth of Existing Industries

There is concern that the continued growth of Llanbedr Aerodrome (specifically in the context of research, development and testing of drones, electric aircraft and other such airships) will prevent the commercialisation of the airfield as a facility to improved travel infrastructure in the area in order to support tourism and leisure. There is potential in the future for the airfield to receive more commercial flights, as other such airfields have done e.g. Portsmouth International Airport at Pease. A commitment to research and development conflicts this future potential. Moreover, there is concern that the investment into this site will disadvantage and prevent growth to existing businesses that work within the area and rely on the aesthetic associated with this rural part of North Wales.

### 4. Lack of Consultation and Joint Venture with Local Stakeholders

The difficulties surrounding Covid-19 have made public consultation far more challenging in 2020-21, however there has been a clear lack of accessible information provided to local people on the impact of the Aerospace's Airspace Change Proposal. Upon speaking with tenants of the Estate and other individuals in the surrounding area, it is clear that a significant proportion of the local population are completely unaware of this proposal and the impacts that it may bring. As a stakeholder in the local area we wished to see more involvement with the community and the use of online consultations events. This proposal has not been brought forward in a way that the local community can properly engage or be involved with. Moreover, it is increasingly difficult for individuals to understand the context



behind this application when Snowdonia Aerospace neither have a functioning website or have shared the masterplan with the members of the public who it affects.

#### 5. Impact on Local UNESCO World Heritage Site

Harlech Castle is listed by the UNESCO world Heritage List as being one of “the finest examples of late 13th century... military architecture in Europe, as demonstrated through [its] completeness, pristine state, evidence for organized domestic space, and extraordinary repertory of [its] medieval architectural form.”\* Within the Airspace Change Proposal there is no reference to thought with regards to the World Heritage Management Plans or the statutory protection afforded to this scheduled monument, bar to say that Cadw will be contacted. In 2017, Harlech Castle received 116,216 visitors; a number which has been increasing year on year from 98,877 in 2016, 89,038 in 2015 and 75,512 in 2014\*. This combined with a £6m project refurbishing Harlech Castle, undertaken by Cadw, with funding from the Heritage Tourism Project (HTP); demonstrates the significance of the landmark and its tourism potential. Given that the landmark is situated in both design proposals, we would wish to see an impact assessment carried out.

#### 6. Impact on the Ecological Significance of the Area

The Morfa Harlech and Morfa Dyffryn Special Area of Conservation (SAC) and the Morfa Dyffryn Site of Special Scientific Interest (SSSI) are two sites that lie within the Danger Area. These sites are visited by nature enthusiasts and, particularly, bird watchers. The noise and physical activity of drones would affect the nesting birds within this area causing significant losses within breeding. The sand dunes at Morfa Dyffryn support important populations of breeding birds, including, but not limited to: Whitethroats (*Sylvia communis*), Skylarks (*Alauda arvensis*), Wheatears (*Oenanthe oenanthe*) and Sedge Warblers (*Acrocephalus schoenobaenus*). 'Lapwings (*Vanellus vanellus*), now so reduced in numbers throughout the UK, nest on the saltmarsh, while other rare bird species that put in appearances at the reserve include Choughs (*Phyrrocorax phyrrocorax*) and Hen Harriers (*Circus cyaneus*); the latter being known to roost in the small area of reedswamp.\* It is vital that these populations of wild birds are not disturbed. The effects of poor drone management can have significant impacts on wild birds which have been frequently cited by both the British Ornithologists' Union and the Royal Society for the Protection of Birds. The creation of a permanent Danger Area has the longevity and intensity to irrevocably damage the previously mentioned species in this area.

#### 7. Impact on the Infrastructure of the Local Area

There is question, as to whether the site could cope with increased influx of vehicles needing to access the airfield. Llanbedr does not benefit from motorway access and parties are worried that even with the Welsh Government committing funding of around £10 million towards the construction of the new Llanbedr access road, that the area will not be able to support the increased activity that the permanent Danger Area will bring. Regardless of any local major road improvements, the immediate access is through the village itself via narrow lanes and in high season for the area's tourism then this will be a further heightened conflict. Improving access from the A496 at Llanbedr was identified by the Snowdonia Enterprise Zone as a key infrastructure project to realise the area's economic potential\* and it is hoped that this will benefit existing businesses by removing the existing issues caused by Aerodrome's traffic. This has come under criticism by local people, who wish to protect the conservation area and do not believe that expansion of the aerodrome's activity is a valid reason to jeopardise this.

#### 8. Intrusion to Privacy

A key issue with the change to a permanent danger zone is the intrusion element of these aircraft. While it is noted that Snowdonia Aerospace are not currently seeking to increase the volume of segregated airspace around Llanbedr Aerodrome associated with the current Temporary Danger Area, changing to a Permanent Danger Area would in your own words allow for 'increase throughput to satisfy the market need'\*. There is a risk that this will likely disturb the quiet enjoyment of individuals who live within the Danger Area. You indeed refer to the 'general consensus that small drones have a similar sound level to cars, but can be perceived to be more of an annoyance because of their higher frequency'\*. In an area that is known for its tranquillity and quietness; we do not find this acceptable.



Finally, there is an increased risk to the security of those properties, as recordings of aerial views of individual's private property could, in theory, potentially fall into criminal hands.

#### 9. Direct Impact on the Glyn Estate

The direct impacts of the airspace change on the Glyn Estate are likely to be significant. With a flourishing holiday-let portfolio, the restoration of Glyn Cywarch to be used as a private venue and a long established history of agricultural and residential tenants; the impacts would be multifaceted. As previously mentioned in Section 8, the invasion of privacy of paid guests, tenants and others in the Estate community is of huge concern. Most guests have deliberately chosen to stay on the Estate for the tranquillity that comes with being in North Wales and Snowdonia National Park. The noise and presence of recording drones flying overhead would be juxtaposed to the unique selling point of these rental properties.

The recent restoration of Glyn Cywarch has been carried out with significant investment to bring the property back to its former glory as a Grade II\* House, with a sensitive economic use to sustain it for the next generation. The ongoing presence of drones and other aircraft overhead totally contradict the protection, setting and appreciation of these historic assets.

There is real concern that the drones will cause distress in the livestock of the Estate's farmers. Given the terrain of the Estate, with steep cliffs in part, it is quite conceivable that the noise of a low flying drone could cause livestock to panic and charge over dangerous terrain; causing considerable injury to the said livestock. Furthermore, the Estate has done lots in recent years for the protection of wild birds such as Ospreys and there is concern that increased air traffic could threaten the success of these measures.

It is for the aforementioned reasons that we do not believe that drones, or other specified aircraft, should be flying over the Estate. Furthermore, we question the soundness of the location for the whole proposal based on impacts to the character and setting, history, people and ecology of the local area.

#### List of References

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

\* UNESCO World Heritage List - Castles and Town Walls of King Edward in Gwynedd

\*Visits to Tourist Attractions in Wales 2017 Summary Data, SOCIAL RESEARCH NUMBER:49/2018 PUBLICATION DATE: 23/08/2018

\* Nature First - Designations: part of the Morfa Harlech and Morfa Dyffryn SAC, Morfa Dyffryn SSSI, and Pen Llyn a'r Sarnau SAC

\* Snowdonia Enterprise Zone Strategic Plan 2018 – 2021.

#### SAC response to ANON-C1XX-V1CV-4:

The issues raised by this respondent have been considered and we believe do not impact on the airspace design being proposed and have therefore been categorised as a Category C impact.

We believe all matters raised have been considered and addressed in greater detail in the Stage 3D Report and the Stage 4A Phase III Full Options Appraisal and are easily mitigated and manageable.

Any assertions or assumptions concerning the closure of local businesses is proven completely to be unfounded and inconsistent particularly when considering the historical and current and ongoing established use of and operations at the airfield. The airfield and the airspace around it, the latter which comprised of previously a much larger DA than presently being proposed and a TDA, again larger than now being proposed in the final design Stage 4A, have operated successfully and safely in parallel with all local business in the region including those immediately abutting the airfield over a number of years without any adverse effect or impact on their businesses.



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The response contains substantial inaccurate and uninformed comment. The stakeholder did not respond to an open offer from SAC to discuss the issues before submitting a response.

SAC will continue to work with all stakeholders to coordinate activities and minimise disruption or nuisance as far as is reasonably practicable. We can and have as part of the consultation process assured local residents that we will not schedule any novel aerospace activities to overfly the town of Harlech, the local villages of Llanbedr, Llanfair or Dyffryn Ardudwy (or those further afield), the Glyn Estate, or any other permanent residence.

The below relates to correspondence had with the respondents land agent prior to their formal response on the portal.

**From:** [REDACTED]  
**Sent:** 14 January 2021 15:20  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Llanbedr EIA and Master Plan - commercial in confidence

Dear [REDACTED],

Thank you for your call and my apologies our airfield web site is still not up and running. In any case please see attached the documents requested which our CEO has stipulated supplied commercial in confidence. By all means forward to [REDACTED].

We would very much welcome any opportunity to discuss the DA further with [REDACTED] and believe we can allay fears. [REDACTED] our lead on the ACP, and myself are available Monday and Tuesday afternoon from 1 p.m. if that were of any help. The days of use in that sector and indeed the times of flights are projected as very low indeed. We believe the altitude any drone would fly at would barely be heard and ultimately if we agree the Glynn estate is especially sensitive, and [REDACTED] did mention this to me, then we can ensure that the estate is not overflowed at all. As with the management of any aerodrome we will respond to any noise complaint and the simplest way of dealing with that is identifying a noise sensitive area and asking pilots to avoid it, and in this case prohibit drones from flying into it. If it were really felt necessary that we should have a Letter of Agreement (LOA) covering the Glynn Estate all we have to do is agree that will be the case. The actual LOA can be provided to CAA later.

In any case we want to be good neighbours; we do not anticipate any issues, we would seek to avoid them, but ultimately we can deal with them should a problem arise.

I hope that may be of help, do feel free to contact me at any time,

[REDACTED]

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From: [REDACTED] >  
Sent: 14 January 2021 14:43  
To: [REDACTED] >  
Subject: Llanbedr EIA and Master Plan

Dear [REDACTED],

Thank you for your recent phone call.

If you could please forward on a copy of the EIA and Master Plan for Llanbedr, then that would be most appreciated for our response to the Airspace Change Proposal.

I will discuss the possibility of a Teams meeting with [REDACTED] very shortly.

Kind regards,

[REDACTED]

[REDACTED]

Rural North West

[REDACTED]

Strutt & Parker,  
Theatre Royal, 14  
Shoplatch,  
Shrewsbury,  
Shropshire, SY1 1HR  
Office: [REDACTED]  
(option 3)

Strutt & Parker, Park  
House, 37 Lower  
Bridge Street, Chester  
CH1 1RS  
Office: [REDACTED]



### 3.7. Response ANON-C1XX-V1CT-2

Firstly I am opposing this proposal because the consultation has been quite inadequate. I've seen no publicity or advertisement for the consultation so only a few people even know about it. Furthermore it's taken place during the Covid Crisis with severe restrictions on people's activities since March and the consultation period has been during severe Lockdown. So people have no opportunity to get together to learn about or discuss the proposal, neither formally nor informally.

\*\*\* So I ask that the consultation period be extended and that during the extension period there should be extensive advertising of the proposal to ensure people are made aware of the proposals and encouraged to respond. It would be undemocratic to continue with the proposal without doing so.

I understand from SAC that there is little current military use of the airfield and that they do not anticipate this changing in future on the basis of current bookings. However the airfield has been used for military drone development. Last year there were plans for RAF Valley to use Llanbedr airfield to develop training for Saudi Arabian aircrew. This was at a time when Saudi Arabia was bombing Yemen into a human disaster zone, which continues to cause considerable public concern and there's concern that there may be military training for other oppressive regimes. The RAF Valley proposal was 'paused' last August, but the use of the term 'paused' indicates it will be reactivated in future.

I'm also concerned about the impact of increased activity over Cardigan Bay on marine life.

In respect of the specific options, I particularly object to:

Option 1: The inclusion within the Danger Area (DA) of the inshore part of Area B, covering the same airspace as Area E in its entirety in Option 2.

Option 2: The inclusion within the DA of Area E2 (2,000 to 6,000 ft) and also E1 (ground to 2000 ft) in so far as there is any scope for activity in E1 when Area E as a whole is activated, despite E1 being described as outside the DA.

My more general concerns include:

1. Tranquillity, the need to maintain this special features of all national parks. In recent decades much of Snowdonia has become noisier for many reasons, detracting significantly from the Park's value for quiet outdoor recreation. The Rhinog mountains are renowned as far and away the wildest, least spoilt, and most tranquil parts of the National Park, notwithstanding the impacts of the activities of military jets. This lofty upland expanse is a 'jewel in the crown', the protection of which from actual and potential threats is of highest priority for the Snowdonia Society.
2. This airspace change proposal follows on from the decision to allocate Llanbedr Airfield as part of the 'Snowdonia Enterprise Zone' in the National Park Local Development Plan (LDP) and the range of land uses now permitted in principle there. However, the introduction to LDP Policy 27 at para 6.26 states only that:  
  
'The Welsh Government Designation at Llanbedr Airfield extends to 227.8 hectare (562 acre) Llanbedr Airfield. Now re-branded as the Snowdonia Aerospace Centre, the site was a former Ministry of Defence owned site. The airfield has three runways of 2.3km, 1.4km and 1.3km providing access to 7,100km<sup>2</sup> of segregated airspace over Cardigan Bay. The simultaneous access by both civil and military systems to this significant area of segregated airspace is unique to any airfield in the UK and is the first of its kind in Europe.'
3. There is no mention there of using airspace inland over the Rhinog mountains for testing, demonstration or training in relation to emerging aviation technologies. Yet the relatively recent SAC consultation documents refer to Area E as providing 'an extended area for upland/mountain operational testing' and SAC has explained that including upland as well as lowland in the DA adds to the 'richness of [testing] environment'. These intentions were not in the public domain when the LDP was formulated.
4. SAC has sought to assure the Society that DA designation will not lead to any significant environmental harm to the conservation and public enjoyment of the special qualities of the Rhinogs,



notably the land area and its biodiversity including birds under Area E in Option 2 and the corresponding part of Area B in Option 1).

In particular SAC has emphasised that:

- Based on knowledge of existing and upcoming users of the existing temporary DA, Area E encompassing part of the Rhinog mountains (and corresponding part of Area B in Option 1) will only experience about 6 days of Danger Area activation each year, with almost all activity being higher than 2,000 ft above sea level.
- Area E1, from ground level to 2,000 ft is proposed 'to remain outside of the DA to keep experimental aircraft clear of the Rhinog mountains.'
- Even on the 6 days, flying time would be likely limited to a few hours sandwiched between preparation and after-landing activities.
- Flying in area E1 is 'unlikely', albeit not entirely excluded. There is a 'twin lock' on flying here, as CAA permission would be needed to activate E1 on a case by case basis depending, for example on the assessed safety of experimental designs.
- The types of unmanned and experimental aircraft now being operated are very quiet. The noise impact flying at 300 metres above ground level would be not much more than the 45 - 50 dB typical ambient noise' range for rural areas.
- The noise scale is logarithmic and there is about a 6 dB drop per 100 metres - most flights will be far above most of the mountain landform and so inaudible to people on the ground.
- SAC can ask operators to avoid flying above any particularly sensitive areas altogether, if notified where those areas are.
- When the DA is not activated, 'normal' civilian and military aircraft can use this airspace. Thus activation displaces such noise to elsewhere.

However I'm concerned that there may be no measures that can ensure that this is delivered should the proposal be approved.

5. Section 5.5 of the Options consultation document concludes that 'the Airspace Change is anticipated to have a very low / negligible impact on tranquillity'. This seems a reasonable assessment in the short term, given SAC's assessment of its business growth may well turn out to be overly-optimistic. The report for Welsh Government entitled Enterprise Zones – Boldly Going issued in May 2018, which states at para 5 of the Summary that:

'... the Committee also heard from the Chair of the Snowdonia Enterprise Zone Board that they had realised very early on that, given the challenges faced in their zone, they were never likely to be able to deliver significant impacts in terms of growth or jobs, at least in the short to medium term. Instead, their focus shifted to exploring the opportunities for the long term development of the zone.'

However this extract does not distinguish between the Llanbedr and Trawsfynydd sites of the Snowdonia EZ and I appreciate that its conclusions are nearly 3 years old. The economic outlook has darkened since 2018, not least for the aerospace sector.

6. However I query SAC's assessment that the Airspace Change proposal would necessarily have a very low / negligible impact on tranquillity in the medium to longer term for the following reasons:
- Looking beyond the next few years, it is not possible for SAC to forecast with confidence which customers may want to locate and grow at Llanbedr Airfield in the medium to longer term, nor how they will want to use different parts of the DA, depending on their particular business needs. One plausible scenario is that a major international company or partnership will wish to set up on the Airfield an advanced avionics R&D, testing and customer demonstration / training centre, and that overland flying in the DA would be a major focus for their intentions. The relevant land use policy in the National Park Local Development Plan (Policy 27) seem to allow for the likely



ground development including uses that are 'ancillary' to 'employment use (B1, B2, B8) and other uses associated with research and development (including aviation and aerospace industries'. Consequently it is entirely reasonable to think that in the medium to longer term the DA Zone E could be activated for a greater number of days each year.

- I'm doubtful that 'typical' ambient noise in rural areas is an adequate baseline with which to compare flight noise. I well remember that when Welsh Water's then new Llanbedr sewerage works was opened a few years ago, there were ongoing complaints about the noise. This puzzled the experts until they considered the ambient noise level of the surrounding area and realised that it was so quiet that the sewerage works was a noisy intrusion, until special measures to reduce the noise level. So I am concerned that the implementation so the proposal will result in the tranquillity of the Arduwy area being damaged, particularly in the Rhinogs where it's such a unique experience especially on calm days even very low levels of noise could be highly intrusive, especially on the higher ground. The base of E2 is 2,000 ft above sea level, therefore allowing flights close to ground level of the higher mountain summits in Area E.
  - Aerospace prototype designs change as R&D moves on. Noisier prototypes might become important, and testing / training programmes may involve protracted flights.
  - Flights would be concentrated in spring / summer / autumn when weather is reasonably good. This is when the Rhinog area is most valuable as a resource for quiet outdoor recreation, and is the period when rare and protected bird species are nesting – in locations that for purposes of species protection will not be widely known.
  - Displaced aircraft noise when the DA is activated would in large part occur elsewhere in the National Park. This is a 'zero sum' issue rather than a benefit of the DA proposal.
  - There are few DAs in the UK open or opening up for commercial R&D testing. This highlights the potential at Llanbedr, assuming it gets a permanent DA, for a development growth scenario as outlined above which could lead to significantly exceeding the 6 days per year usage currently predicted by SAC.
  - Finally, the issue of visual intrusion could also become important. A few experimental flights on about 6 days a year could indeed have novelty interest to visitors and local residents. However, that would not be the case if area E were used routinely on many days a year.
7. For all the above reasons, I object to both airspace change Options as currently proposed, on the grounds that in the medium to long term, without any further controls or constraints being imposed, either Option could lead to significant harm to public enjoyment of the Rhinog mountain area.
8. A related concern is that consultation seems to have proceeded without publication of a legislation-compliant Environmental Impact Assessment and a screening report on whether a Habitats Assessment is needed. With four Special Areas of Conservation, a National Nature Reserve and a Special Protection Area all in close proximity, and without adequate assessment, the proposals could lead to irreparable harm to the natural environment including protected species. The DA designation process may also be vulnerable to a legal challenge if due process has not been followed.

SAC has drawn our attention to Stage 7: 'Post Implementation Review' in CAA's Airspace Change Guidance (CAP1616,CAP1616\_Airspace\_Change\_Ed\_3\_Jan2020\_interactive.pdf (caa.co.uk) ) as a means to resolve problematic impacts on the National Park arising from the DA. These reviews can lead to CAA requiring a wholly new airspace change proposal to be taken forward. Such reviews are undertaken once, usually about 12 months after implementation. However the risks and potential for harmful impacts that I am concerned about in Area E are likely to be several years away from now. Moreover, these reviews appear to be intended primarily to address matters within CAA's core technical competencies. They do not appear suited to dealing with complex environmental impacts in nationally protected areas, regarding some of which one would expect Natural Resources Wales

to be the lead public body. Consequently I am not satisfied that Post Implementation Review by the CAA can address our concerns.

**SAC response to ANON-C1XX-V1CT-2:**

The issues raised by this respondent have been considered and we believe do not impact on the airspace design being proposed and have therefore been categorised as a Category C impact.

We believe all matters raised have been considered and addressed in greater detail in the Stage 3D Report and the Stage 4A Phase III Full Options Appraisal and are easily mitigated and manageable.

SAC will continue to work with other stakeholders to coordinate activities and minimise disruption or nuisance as far as is reasonably practicable.



### 3.8. Response ANON-C1XX-V1SR-G

Shell Island sits on the seaward side of the Airfield Boundary, the below objections are not prejudice of previous correspondence between Shell Island (SI) and Snowdonia Aerospace (SA) when path have been crossed.

1. At no time, has SA approached SI with an Emergency Action Plan should an aircraft come down in the water or on our site. Shell Island is Europes largest Campoing site, with the landing approach for not just the main runway, 018, but also 016, both above our camping fields and also our main Tidal Causeway, which is the only vehicle access to our business. At times, SI has up to 3000 people staying on site, and employs over 100 staff in the season. over a year, SI has over 100000 people visiting this unique part of Wales.
2. The Economic Impact Assessment plan that has not been Publicly Published, but SA states up to 500 jobs could be created in the plan.

With out this being made public, a non biased assessment should be sought from the CAA, as SI is worried that the operations could affect its day to day business, and as such, objects to this Impact Assessment being read by the CAA. We did request it being made public, and was promised, but up to 7.30pm on the 22nd of January, itstill has not been made public.

3. Quoted at the public drop in at Llanbedr Airfield on the 10th December, [REDACTED], Airfield manager said, "Boats will not be allowed into the area when activated, as the delay in controlling the UAV is such, that a UAV can travel up to 500m before it can be controlled and change of flight path observed". A gentleman that also worked for QinetiQ also agreed with him, who was present.

No mention was given for compensation to our paying boat owners who store and launch from the Island, and at the time.

We asked [REDACTED], had other Local yacht clubs been informed about the Danger area?

The Response was, "They can see our Facebook Page they wish to respond"

This was infront of all SI Directors and SI Managers and the gentleman from QinetiQ.

4. 5.2 in the SA Airspace Change Proposal Consultation Document ( Stage 3) states that persons were put on the beach, (Benar Beach, publicly accessible) for safety with fire extinguishers etc. to make sure that no person, on a public beach was in danger as the UAV was out of line of sight from the Airfield, when then test commenced. This beach in the summer has a daily attendance of over 2000 people, joining our boundary which itself has a very busy beach on ideal flight days. If we had to close our beach etc for safety, we would have to close our business on those days, both for camping and also daily visits, due to the tranquility of our Beach and the Island itself.

This beach is part of the National Coastal path of Wales, some 800 miles long. Its also transits along side the airfield some 20m from the boundary fence in the flight path of both runways 016 and 018. The path closest to these runways is our only access, via walking to SI, when the tide covers our causeway, and their is no mention if these would need to be shut on "Danger Days", cutting the access for staff and visitors to the area enjoying the Welsh Coastal path.

5. The density of population per KM2 stated in the public documents for Shell Island, does not account for the Density in the camping season at SI, this is a false number. At no time have SA or the Company that did the assessment, been in touch with oursefs for official figures.

We have no problem with jobs being created in this part of Wales, but these jobs should not be created if affects businesses which are already prosperous. And with the lack of detail from the Economic Impact Assessment, we object to any expansion outward from the boundary fence, until more details are released.

We are available to the CAA should you have any questions etc. that you may wish to ask, both via email or phone.

**SAC response to ANON-C1XX-V1SR-G:**

The issues raised by this respondent have been considered and we believe do not impact on the airspace design being proposed and have therefore been categorised as a Category C impact.

We believe all matters raised have been considered and addressed in greater detail in the Stage 3D Report and the Stage 4A Phase III Full Options Appraisal and are easily mitigated and manageable.

Any assertions or assumptions concerning the closure of local businesses is proven completely to be unfounded and inconsistent particularly when considering the historical and current and ongoing established use of and operations at the airfield. The airfield and the airspace around it, the latter which comprised of previously a much larger DA than presently being proposed and a TDA, again larger than now being proposed in the final design Stage 4A, have operated successfully and safely in parallel with all local business in the region including those immediately abutting the airfield over a number of years without any adverse effect or impact on their businesses.

In relation to the continued access to the beach and inshore area for tourist and recreational activities, this issue was raised at the open days and also via the Maritime Unit of Gwynedd Council (correspondence relating to this can be seen at Section 4 of this document below). SAC responded directly to Gwynedd Council in December and at the same time published as part of the "Frequently Asked Questions" on the Airspace Change Portal for all other respondents.

During the consultation SAC confirmed to respondents and can further now reiterate that there is no plan and no current requirement for an associated marine traffic exclusion zone in this area and that all marine activities will be able to continue safely when the Danger Area is active, as has been the case with the Temporary Danger Area over the past five years. In a similar manner to maritime operations, there will also be no constraints on land access around the airfield when the Danger Area is activated - e.g. public footpaths etc. If a need arose for an exclusion area beyond the airfield boundary we would seek to provide as much notice as possible and to negotiate with stakeholders to minimise any perceived impact on other activities, both in terms of minimising the geographic area and the duration of operation. However, we anticipate that any such requirement will only be in very rare and exceptional circumstances. We will also continue to work closely with Gwynedd Council and local Community Councils on matters relating to the airfield.

SAC will continue to work with other stakeholders to coordinate activities and minimise disruption or nuisance as far as is reasonably practicable.



#### 4. Other Correspondence

The following correspondence was also received / entered into with several other interested parties a number of which did not submit any formal response to the consultation either via the portal, post or email. In the interest of openness we have enclosed this correspondence.



#### 4.1. Correspondence with Natural Resources Wales

During the public consultation period the below correspondence was received from Natural Resources Wales however they did not submit any formal response or submission to the portal (or via email or post).

**From:** [REDACTED]  
**Sent:** 14 January 2021 10:34  
**To:** Danger Area - Snowdonia Aerospace <[da.acp@snowdoniaaerospace.com](mailto:da.acp@snowdoniaaerospace.com)>  
**Cc:** [REDACTED]  
**Subject:** RE: Snowdonia Aerospace Llanbedr DA ACP-2019-58

Dear [REDACTED],

Hope you are keeping well, I work for NRW and I'm getting in touch about the current public consultation for the Snowdonia Aerospace Airspace Change Proposal, ACP-2019-58, for the Llanbedr Danger Area.

In order for NRW to respond appropriately to the consultation we would need further information to better understand how the activities of the proposal may impact Protected Sites. For example, we would need to consider the likely impact your proposals would have on Sites of Special Scientific Interest (SSSI); Special Conservation Areas (SAC) and Special Protection Areas (SPA) as well as any section 7 Habitats & Species.

I read in one of the consultation document that an Ecological Impact Assessment for the site is being conducted – the document states that this survey is intended to provide a baseline assessment of the ecological value and constraints of the site, as well as evaluate the potential impacts of future developments on protected and/or notable species and sites. Do you have information of when it would be possible for us to review that as it sounds like this may cover the issues I mention above.

We would also normally expect for potential environmental impacts on European Protected Sites be assessed through a Habitat Regulation Assessment (HRA) by the competent authority associated with the permission for the activity - would this be the CAA in your case? If possible could you confirm who will be issuing the authorisation for your proposal as they will ultimately be responsible for the Habitat Regulation Assessment.

Hope to hear from you soon,  
Many thanks and take care

[REDACTED]

[REDACTED]

Uwch-ymgyngorydd Morol (Gogledd-Orllewin) / Senior Marine Advisor (North West)

Cyfoeth Naturiol Cymru / Natural Resources Wales

**From:** Airspace Policy <[Airspace.Policy@caa.co.uk](mailto:Airspace.Policy@caa.co.uk)>  
**Sent:** 21 January 2021 16:52  
**To:** Environment Team Dwyfor ac Meirionnydd / Tim Amgylchedd Dwyfor & Meirionnydd <[TimAmgylcheddDwyforacMeirionnydd@cyfoethnaturiolcymru.gov.uk](mailto:TimAmgylcheddDwyforacMeirionnydd@cyfoethnaturiolcymru.gov.uk)>  
**Cc:** Airspace Policy <[Airspace.Policy@caa.co.uk](mailto:Airspace.Policy@caa.co.uk)>; Danger Area - Snowdonia Aerospace <[da.acp@snowdoniaaerospace.com](mailto:da.acp@snowdoniaaerospace.com)>  
**Subject:** RE: Snowdonia Aerospace/CAA Danger Area consultation

Dear [REDACTED]

Your communication has been forwarded to the change sponsor for their consideration.

Kind regards

[REDACTED]

Airspace Specialist (Correspondence)  
Airspace, ATM & Aerodromes  
Civil Aviation Authority

**From:** Environment Team Dwyfor ac Meirionnydd / Tim Amgylchedd Dwyfor & Meirionnydd

<[TimAmgylcheddDwyforacMeirionnydd@cyfoethnaturiolcymru.gov.uk](mailto:TimAmgylcheddDwyforacMeirionnydd@cyfoethnaturiolcymru.gov.uk)>

**Sent:** 20 January 2021 16:14

**To:** Airspace Policy <[Airspace.Policy@caa.co.uk](mailto:Airspace.Policy@caa.co.uk)>; AirspacePortal <[Airspace.Portal@caa.co.uk](mailto:Airspace.Portal@caa.co.uk)>

**Subject:** Snowdonia Aerospace/CAA Danger Area consultation

Dear Sir,

We have received requests to participate in a consultation regarding changes to the CAA Danger Area by The Snowdonia Aerospace, Llanbedr, Gwynedd North Wales.

Normally we would wait for the formal consultation which would include the Environmental Impact Assessment EIA and Habitat Regulation Assessment HRA.

Would it be possible to discuss the case with one of your officers so we could better understand the process and permitting regime?

Thank you

Regards

[REDACTED]

Arweinydd Tim Amgylcheddol Dwyfor & Meirionnydd Environment Team leader

Cyfoeth Naturiol Cymru / Natural Resources Wales

Adeiladau'r Llywodraeth

Ffordd Pont yr Arran,

DOLGELLAU.

LL40 1LW

0300 065 5304 / 07786113335

#### **SAC responses to correspondence received from Natural Resources Wales:**

It should be noted Natural Resources Wales are one of the Stakeholders listed in Appendix B to the 3D Report who we directly provided a number of regular reminders relating to the consultation and actions required.

#### **Response to Natural Resources Wales email of the 14 January from [REDACTED]**

**From:** Danger Area - Snowdonia Aerospace

**Sent:** 19 January 2021 17:56

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: Snowdonia Aerospace Llanbedr DA ACP-2019-58



Dear [REDACTED],

Re: Snowdonia Aerospace Llanbedr DA ACP-2019-58

I have the following from [REDACTED].

Thank you for your email of the 14 Jan in relation to the above. Apologies for not getting back to you sooner. With a view of trying to give you some background to the position and further clarity on what this specifically relates to and work done to date I set out below a précis of this.

The application made is solely in relation to the use of Airspace above and around the Airfield for the testing and evaluation of drones and other novel aerospace systems. This is consistent with the history and heritage of the site as a former MOD defence and research establishment (testing drones) and activities we ourselves have been undertaking over the course of the last 7 years following the grant of a Temporary Danger Area (TDA) in 2014 and grant of an unrestricted Certificate Of Lawfulness (for research and development for the testing and evaluation and development of UAVs) in 2011. As part of the processes involved in the granting of the TDA and the Certificate of Lawfulness the NRW were one of several stakeholders who were consulted at the time. Under current Civil Aviation Authority (CAA) regulations we are unable to continue to operate on an ongoing TDA as by its name implies this is designed to be temporary, consequently our application now for a Permanent Danger Area. Reference to a Permanent Danger Area (rather than the current TDA) does not mean the airspace is permanently active, it 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 and will only be activated when novel aerospace flying activities are due to take place. Outside these times the airspace will remain open to all air users.

From an environmental perspective, this means it is very much more of the same as the past 7 years and consistent with the consents we have already secured, we are merely changing the airspace designation to safeguard our intended ongoing core business activities. As the vast majority of the usage of this airspace will be for the testing of drones, electric aircraft and balloons any environmental impact will be substantially less than that which may result for the current Class G open airspace for use by all and our current alternative planning use we secured in 2012 for the use of the site as a aircraft maintenance, decommissioning, disassembly, parts recover, refitting and engineering facility, (the latter a consent again with the NRW would have been a consultee on). In fact as part of our current application we had to provide the CAA with details of any potential impacts associated with annual CO2 emissions,



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which we calculated will be less than that of an average family car, and noise, which we showed will be significantly less than any of the other local air traffic, particularly the RAF training aircraft from RAF Valley.

The references you have made to within your email are more consistent with and fully appropriate in relation to any proposed new ground built development we may wish to look to undertake at the airfield, in line with our current Local Plan designation / allocation / supporting statement below and our longer term aspirations to become one of the UK leading Spaceports (as recommended by the CAA, DFT, UK Space Agency and Welsh Govt):

- *operations and uses associated with the aviation and aerospace industry, including those associated with airfield infrastructure and services and airspace management;*
- *new uses including employment use (B1, B2, B8) and other uses associated with research and development (including aviation and aerospace industries);*
- *employment-related training and education purposes;*
- *other uses ancillary to the uses identified above including accommodation, catering and leisure.*

In parallel with our current and ongoing activities and reflective of our longer term development plans I can confirm we are currently preparing a Masterplan for discussion with the National Park, Stakeholders (including yourselves as a key stakeholder) and the local community and as part of this we have and continue to consider our proposals in the wider site context and planning policy which of course has regard to Planning Policy Wales (PPW), edition 10, December 2018, and supplemental Technical Advice Notes (TANs), the most relevant of which are:

No.5 – Nature Conservation and Planning – September 2009

No.11 – Noise – October 1997

No.12 – Design – March 2016

No.14 – Coastal Planning – March 1998

No.15 – Development and Flood Risk – July 2004

No.18 – Transport – March 2007

No.23 – Economic Development – February 2014

No.24 – Historic Environment – May 2017

We fully appreciate that these advice notes, alongside National guidance, have implications for various aspects of our wider development proposals. As part of the work we have done to date (and as referenced in your email) we have undertaken an initial Ecological Impact Assessment (by Enfys Ecology Ltd) to assess any effects and impacts of our proposed new development at an appropriate level of detail. It takes account of the habitats present on the site and immediate adjacent areas, as well as assessing the potential of the site for protected species. It provides a baseline assessment of the ecological value and constraints of the site, as well as evaluating the potential impacts of the proposed developments on protected and/or notable species and sites. The assessment specifically assessed the habitats present on the site and immediate adjacent areas where possible, as well as assessing the potential of the site for protected species. The report included a habitat map and a desk based study of surrounding designated sites and species records from within 1km of the site. This survey is intended to provide a baseline assessment of the ecological value and constraints of the site, as well as evaluate the potential impacts of the proposed developments on protected and/or notable species and sites and where appropriate highlighted further surveys which may be needed before the project can progress to planning.

The interim ECiA, including Preliminary Ecological Appraisal (PEA), Preliminary Roost Assessment (PRA) and Habitat Suitability Index (HSI) assessment confirmed that both of our proposed new development areas at the airfield are generally species poor, reflecting established management and functional use of the site as a whole. The survey findings can be summarised as follows;

- Habitats generally poor.
- Great crested newt very likely to be present on site.
- Bat evidence in one building,
- Suitable reptile habitat and nearby records indicate reptiles may be present.
- No rare or protected plant species found.
- No Invasive non-native plants found.

Further surveys are recommended for the northern zone:

- Bat activity surveys on affected buildings.
- Reptile surveys.
- Nesting bird surveys if vegetation removed in the nesting season, and more generally,
- Great crested newt surveys of the ponds at or near both zones.

Reasonable Avoidance Measures (RAMs) and Mitigation

Enhancements will be amended following surveys, however likely to include:

- Improvement to habitats for amphibians
- Improvement to habitats for reptiles, depending on survey results



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- Bat mitigation depending on surveys
- Habitat set-aside
- Pond improvements if compatible with use as fire ponds.
- General RAMS for site works included.

Over and above the need for ongoing surveys it is anticipated though that the use of planning conditions in respect of the intended planning application can achieve the following:

- avoid adverse impacts or remove the likelihood of adverse impacts occurring;
- reduce adverse impacts that may occur;
- compensate for losses or impacts that could not be avoided or mitigated;

As part of the ongoing preparation of the proposed Masterplan we have and continue to undertake a range of further surveys and assessments. Once completed this will be available to and form part of our Masterplan discussions with the National Park and the likes of yourselves and in this respect we look forward to progressing these discussions as soon as we are in a position to do so.

To add I should also advise that, as an operational airfield we do also have to provide a Wildlife Management (including Bird control) Policy (again approved by the CAA) to ensure the safe operation of the site.

I hope this gives yourselves a little more insight in to the current Airspace application, our wider longer term development plans and work done to date and ongoing. We look forward to working with your organisation as we progress our Masterplan however in the meantime we hope you will be in a position of supporting our current CAA application which as I referred to above is merely redesignating what has taken place (and continues to take place ) at the airfield for the past 50 years and support the ongoing sustainable use of the site as the UK's leading research and testing site for novel aerospace systems and drones over and above its other permitted uses.

Kind regards,

[REDACTED]

**Response to further email from Natural Resources Wales of the 20 January from [REDACTED]**

**From:** Danger Area - Snowdonia Aerospace

**Sent:** 22 January 2021 12:44

**To:** Environment Team Dwyfor ac Meirionnydd / Tim Amgylchedd Dwyfor & Meirionnydd  
<TimAmgylcheddDwyforacMeirionnydd@cyfoethnaturiolcymru.gov.uk>

**Cc:** Airspace Policy <Airspace.Policy@caa.co.uk>; [REDACTED]

**Subject:** RE: Snowdonia Aerospace/CAA Danger Area consultation

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Dear [REDACTED],

The CAA has forwarded your email below to us. Please see our earlier reply below ([in this instance above](#)) to [REDACTED] Uwch-yngynghorydd Morol (Gogledd-Orllewin) / Senior Marine Advisor (North West)

Cyfoeth Naturiol Cymru / Natural Resources Wales and also copied to [REDACTED] at NRW.

Kind regards,

[REDACTED]



#### 4.2. Correspondence with Gwynedd Council Maritime Officer

During the public consultation period the below correspondence was received from Gwynedd Maritime Officer however they did not individually as a Department of Gwynedd Council submit any formal response or submission to the portal (or via email or post).

**From:** [REDACTED]  
**Sent:** 08 December 2020 16:16  
**To:** Danger Area - Snowdonia Aerospace <[da.acp@snowdoniaaerospace.com](mailto:da.acp@snowdoniaaerospace.com)>  
**Cc:** [REDACTED]  
**Subject:** Maritime Exclusion Zone-Llanbedr

Dear Sirs,

I represent the Maritime Unit of Cyngor Gwynedd.

I refer to the Public Consultation regarding the proposal at Llanbedr in Gwynedd.

I have endeavoured to seek information in the consultation document on possible future exclusion zones for marine traffic in the Llanbedr area. I understand that consideration is being given to establishing a marine traffic exclusion zone in the area.

I attach a link to the site where I have sought the information but I am unfortunately unable to establish if a marine exclusion zone forms part of the proposal.

[Snowdonia Aerospace Centre Danger Area Airspace Change Proposal - The Civil Aviation Authority and Airspace Change sponsors - Citizen Space](#)

Would it please be possible for you to confirm if there is any intention to establish a marine traffic exclusion zone in the sea off Llanbedr as part of the future development proposal.

If such a proposal is being considered could you please guide me to the relevant site where such details can be seen.

I look forward to hearing from you in due course.

Cofion gorau,

[REDACTED]

Swyddog Morwrol  
Maritime Officer

[REDACTED]

**From:** [REDACTED]  
**Sent:** 22 December 2020 12:59  
**To:** Danger Area - Snowdonia Aerospace <[da.acp@snowdoniaaerospace.com](mailto:da.acp@snowdoniaaerospace.com)>  
**Cc:** [REDACTED]

[REDACTED]

[REDACTED]

**Subject:** Maritime Exclusion Zone-Llanbedr

Dear [REDACTED],

Thank you very much for your e-mail and for confirming the present position at Llanbedr. I am most grateful to you for the early and comprehensive reply.

We shall ensure that this message is conveyed to all who enquire with us. We shall also ensure that such information is conveyed to our Harbour Consultative Committees which next meet in March 2021.

Posting the details on the FAQ section will also be of assistance. Thank you for taking such action.

May I take this opportunity to wish you all a Happy Christmas and that you all remain safe and well over the festive period and throughout 2021 and beyond. Happy New year to you all.

Kind regards,

[REDACTED]

Swyddog Morwrol  
Maritime Officer

**SAC response to correspondence received from Gwynedd Council Maritime Officer:**

**Response dated 22<sup>nd</sup> December to Gwynedd Council Maritime Officer email of the 08 December**

Dear [REDACTED]

Thank you for your email in response to our public consultation on the Airspace Change Proposal, ACP 2019-58 Llanbedr Danger Area. We can confirm that there is no plan and no current requirement for an associated marine traffic exclusion zone in this area and that all marine activities will be able to continue safely when the Danger Area is active, as has been the case with the Temporary Danger Area over the past five years. The flying operations that will be conducted from Llanbedr aren't in themselves inherently dangerous, but because some of the experimental aircraft are unable to comply fully with the requirements of the Air Navigation Order (ANO), the Civil Aviation Authority (CAA) requires these activities to be contained within segregated airspace – *i.e.* a Danger Area in CAA nomenclature. All of the aircraft that will fly within the Danger Area will also require separate CAA approval of their Operating Safety Case (OSC). If the review of an OSC were to identify a need to temporarily exclude marine traffic then we would seek to provide as much notice as possible and to negotiate with stakeholders to minimise the impact on other maritime activities, both in terms of minimising the geographic area and the duration of operation. However, we anticipate that any such requirement will only be in very rare and exceptional circumstances.

In a similar manner, there will also be no constraints on land access around the airfield when the Danger Area is activated – e.g. public footpaths etc. – apart from in the same rare and exceptional circumstances. We will also continue to work closely with Gwynedd Council and local Community Councils on matters relating to the airfield.

We trust that this information satisfactorily answers your questions and we'll be happy to provide more details if required. We will also put this response on the "Frequently Asked Questions" (FAQ)



element of the online portal for the public consultation so that the information is available to as wide an audience as possible.

Yours sincerely,

■

**Response dated 23<sup>rd</sup> December to thank you letter from Gwynedd Council Maritime Officer email of the 22 December**

■

Many thanks for your engagement and follow up email and do of course please pass on the message. I am glad our reply helped in understanding.  
Thank you for your good wishes for Christmas and the New Year and our compliments of the season to you and all your colleagues.

Kind regards

■

#### 4.3. Correspondence with Welsh Language Commissioners Office

During the public consultation period the below correspondence was received from the Welsh Language Commissioners Office however they did not submit any formal response or submission to the portal (or via email or post). Post receipt of this email SAC did obtain the advice of the CAA before replying to the respondent.

**From:** [REDACTED]  
**Sent:** 22 January 2021 16:24  
**To:** Danger Area - Snowdonia Aerospace <[da.acp@snowdoniaaerospace.com](mailto:da.acp@snowdoniaaerospace.com)>  
**Cc:** [REDACTED]  
**Subject:** Consultation on Llanbedr Airport

Annwyl Syr / Madam,

I am writing to you from the Welsh Language Commissioner's office following receipt of a complaint from a member of the public regarding the fact that the following consultation document is available only in English: <https://consultations.airspacechange.co.uk/snowdonia-aerospace-llp/snowdonia-daacp/>

It may be that this is a clerical error and that the issue can be resolved simply by making the Welsh language documents available on the consultation site. If this is not a clerical error, please could you inform us why the decision was made to allow the consultation to go ahead only in English.

I look forward to your response – and to discussing with you the ways in which the Hybu / Promotion Team within the Welsh Language Commissioner can provide help and support to you in providing Welsh language choices to the public in Wales.

Yn gywir,

[REDACTED]  
Hybu a Hwyluso / Promotion and Facilitation  
Comisiynydd y Gymraeg / Welsh Language Commissioner

#### **SAC response to correspondence received from the Welsh Language Commissioners Office:**

**From:** Danger Area - Snowdonia Aerospace  
**Sent:** 28 January 2021 10:32  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Consultation on Llanbedr Airport

[REDACTED] good morning,

We provided the following response to an organisation in North Wales which is copied below in full as sent, in Welsh and English. It shows we referred the organisation's request to the CAA and the response provided to us by CAA. I think this makes the position clear.

Kind regards

[REDACTED]



O safbwynt y cais a wnaed gan Ganolfan Awyrodod Eryri (SAC) am ohirio'r ymgynghoriad cyhoeddus ar y Cynnig Newid Aerofod ACP-2019-58 hyd nes bydd yr holl ddogfennau technegol wedi eu cyfieithu i'r Gymraeg, rydym wedi cyfeirio'r cais i ystyriaeth yr Awdurdod Hedfan Sifil (CAA), sef y rheoleiddiwr a'r corff sy'n llunio penderfyniad. Dyma oedd eu hymateb:

1. Mae'r ymgynghoriad yn cael ei gynnal o dan reoliadau'r CAA ac fel y cyfryw nid oes raid i SAC fel cwmni preifat ddarparu fersiynau dwyieithog o'r holl ddogfennaeth.
2. Bu iddynt drafod a chymeradwyo'r Strategaeth Ymgynghori a gyhoeddwyd gennym ac sydd yn nodi mesurau i gynorthwyo, hyd y mae'n rhesymol ac ymarferol bosibl, trwy gyhoeddi'r datganiadau i'r wasg a'r Canllawiau Syml yn ddwyieithog ac hefyd trwy ddarparu gwasanaeth cyfieithu ar gyfer y diwrnod agored penodol ar gyfer siaradwyr Cymraeg. Maent yn derbyn ein bod wedi dilyn y Strategaeth hon yn llawn.

Gan hynny, mae'r CAA yn credu – gan ein bod wedi cwrrdd â phob ymrwymiad a nodwyd ac hefyd wedi bod yn broactif wrth gwrrdd ag anghenion y rhanddeiliaid – y gall yr ymgynghoriad fynd rhagddo fel y bwriadwyd gan ddod i ben ar ddydd Gwener 22ain Ionawr 2021 ac nad oes unrhyw reswm cyfiawn dros oedi na gohirio'r ymgynghoriad presennol.

O ran eich cais ein bod yn arwyddo datganiad yn gwahardd defnyddio ein adnoddau i ddibenion militaraid, ni ellid disgwyl i unrhyw gwmni lesteirio busnes yn y dyfodol yn artiffisial yn y fath fodd. Fodd bynnag, gobeithio y gallwch, o ganlyniad i'n trafodaeth yn ystod y diwrnod agored ar faes glanio Llanbedr, weld bod natur ein busnes wedi ei anelu yn bennaf tuag at fath newydd ac arloesol o hedfan yn y DU, a fyddai yn fanteisiol iawn i'r gymdeithas, gyda ffocws arbennig ar ddronau-er-lles. Rydym hefyd yn y broses o ddiweddarau deunydd ein gwefan ni ac un Aerofod Cymru i adlewyrchu'n well beth yw ein cyfeiriad busnes cyfredol.

Yn gywir iawn,



This response was written originally in English copied below:

Dear \_\_\_\_\_

We have referred your request to pause the public consultation relating to the Snowdonia Aerospace (SAC) Airspace Change Proposal, ACP-2019-58, until all technical documents have been translated into Welsh to the Civil Aviation Authority (CAA), as the regulator and determining body, for their consideration. Their response is as follows:

1. The consultation is being conducted under CAA regulations and as such there is no requirement on SAC as a private company to provide dual language versions of all materials;
2. They noted and approved our published Consultation Strategy which set out measures to assist as much as reasonably practicable with dual language versions of the press release and Easy Read Guide and the provision of a translator for a dedicated Welsh-language open day. They have accepted that we have followed this strategy in full.

**COMMERCIAL-IN-CONFIDENCE**

The CAA therefore believes that as we have met all of our stated commitments and have also been proactive in addressing stakeholder needs that the consultation can continue as planned through to conclusion on Friday 22<sup>nd</sup> January 2021 and there is no justifiable reason to pause or suspend the current consultation.

With regard your request that we sign a declaration prohibiting use of our facilities for military purposes, no company could reasonably be expected to artificially constrain future business in such a manner. However, we hope that as a result of our discussion during the open day at Llanbedr Airfield you can see that the nature of our business is geared primarily toward new and novel aviation in the UK that has the potential for strong societal benefit, with a particular focus on drones-for-good. We are also in the process of updating our website material and that of Aerospace Wales to better reflect the current business direction.

Yours sincerely,



#### 4.4. Post Closure of Consultation Response

The below response was received by email on the 04 February 2021 post the formal closure of the consultation period which ended on the 22 January 2021. We have included this for transparency however have not included this within our consultation review and analysis of responses.

**From:** [REDACTED]  
**Sent:** 04 February 2021 10:25  
**To:** Danger Area - Snowdonia Aerospace <da.acp@snowdoniaaerospace.com>  
**Cc:** [REDACTED]  
[Airspace.policy@caa.co.uk](mailto:Airspace.policy@caa.co.uk)  
**Subject:** OBJECTION:ACP-2019-58

[REDACTED]

Dear Sir

This application is for the establishment of a permanent Danger Area which builds on a TDA that has been established at a previous date.

You admit to a period during which you have operated drones in a TDA environment but it hasn't occurred to you to investigate the challenges involved in integrating drones into the general aviation environment in class G airspace.

General aviation has been misled into believing that the establishment of TDAs for drones is an interim measure which will lead to airspace user integration. By your actions you demonstrate this was never the case and we are to expect a mosaic of drone exclusion Zones across the whole of the UK with General Aviation excluded from most of UK lower airspace and all of airspace above 2500 feet.

Class G airspace is the last bastion of all classes of aviation and it must not be sacrificed.

There is no assessment of the challenges involved in integrating drones into class G airspace. Without a clear understanding of these difficulties you can't say whether drones will ever be able to operate outside of segregated airspace and on that basis alone your application must fail. See below,

[REDACTED]

I note that the identities of all participants in the meetings you have held have had their details removed, but a condition of responding to your ACP is that I must identify myself. This is inequitable.

1. The CAA has a policy of keeping the volume of controlled airspace to the minimum necessary to meet the needs of UK airspace users and to comply with its international obligations.<sup>7</sup> <https://www.caa.co.uk/Commercial-industry/Airspace/Airspace-change/Airspace-Change/>



2. BVLOS flight will normally require either:

- a technical capability which is equivalent to the method the pilot of a manned aircraft uses to 'see and avoid' potential conflicts

2. BVLOS flight will normally require either:

- a technical capability which is equivalent to the method the pilot of a manned aircraft uses to 'see and avoid' potential conflicts - this is referred to as a Detect and Avoid (DAA) capability
- a block of airspace to operate in which the unmanned aircraft is 'segregated' from other aircraft - because other aircraft are not permitted to enter this airspace block, the unmanned aircraft can operate without the risk of collision, or the need for other collision avoidance capabilities
- clear evidence that the intended operation will have 'no aviation threat' and that the safety of persons and objects on the ground has been properly addressed.

<https://www.caa.co.uk/Consumers/Unmanned-aircraft/Our-role/An-introduction-to-unmanned-aircraft-systems/>

[REDACTED]

**SAC response to Post Closure of Consultation Response:**

Dear [REDACTED]

Your email is acknowledged though we must make you aware it comes after the Public Consultation closure deadline which was on 22<sup>nd</sup> January.

The objection will therefore not be added to the analysis already completed ready for submission to CAA. However, we will include the email in the annex to be submitted to CAA for consideration and in a redacted format for public view.

Kind regards

[REDACTED]

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