

CAA Consultation Assessment

Title of airspace change proposal	Llanbedr Danger Area
Change Sponsor	Snowdonia Aerospace LLP
Project Reference	ACP-2019-58
Account Manager	[REDACTED]
Case study commencement date	22/02/21
Case study report as at	05/05/21
<p><i>Instructions</i></p> <p>In providing a response for each question, please ensure that the 'status' column is completed using the following options:</p> <ul style="list-style-type: none"> • YES • NO • PARTIALLY • N/A <p>To aid the SARG Lead it may be useful that each question is also highlighted accordingly to illustrate what is:</p> <p>resolved YES not resolved PARTIALLY not compliant NO</p>	
<p>Executive Summary</p> <p>Snowdonia Aerospace Centre (SAC) has submitted an airspace change proposal (ACP) for a permanent Danger Area (DA) in the vicinity of Llanbedr Airfield to provide an area of segregated airspace for the Research, Development, Test and Evaluation (RDT&E) of novel aerospace systems and to provide an air corridor to link Llanbedr Airfield with the existing Danger Area D201 for extended range, altitude and endurance testing.</p> <p>The change sponsor has prepared two design options that consisted of multiple segments; Option 1 was considered to be easier to interpret and to provide greater flexibility for operators using the DA. Option 2 was considered to be more complex, but offered more advantages in terms of flexible use of airspace (FUA). The change sponsor stated that both options would be practicable for future business and conducted a 7-week consultation leaving it up to stakeholders to express their preference, provide any feedback on the impact both options could have on them and to provide any suggestions they may have to influence the final designs.</p> <p>There were a total of 140 responses received, with 83 of respondents supporting the proposed changes, and modifications to the airspace design have been made, creating Option 2b, to address the issues raised in the consultation responses.</p>	

PART A – Summary of Airspace Change Process to date		
A.1	https://airspacechange.caa.co.uk/PublicProposalArea?plD=193	
A.2	Stage 1 DEFINE Gateway	28/08/2020
A.2.1	The Llanbedr DA Stage 1 and Stage 2 Gateways were initially held on 31 July 2020 consecutively. The Gateway assessment meeting concluded that some Engagement requirements of the process were not satisfactorily met, specifically the submission reports did not provide sufficient explanation of how stakeholders' feedback on the design principles and the design options has been accounted for by the change sponsor. The re-submission was presented on time for August Gateway and I was satisfied that the change sponsor had met the requirements of the CAP 1616 process up to that point. Progress to the next Step of the process was approved.	
A.3	Stage 2 DEVELOP & ASSESS Gateway	28/08/2020
A.2.1	The Llanbedr DA Stage 1 and Stage 2 Gateways were initially held on 31 July 2020 consecutively. The Gateway assessment meeting concluded that some Engagement requirements of the process were not satisfactorily met, specifically the submission reports did not provide sufficient explanation of how stakeholders' feedback on the design principles and the design options has been accounted for by the change sponsor. The re-submission was presented on time for August Gateway and I was satisfied that the change sponsor had met the requirements of the CAP1616 process up to that point. Progress to the next Step of the process was approved.	
A.3	Stage 3 CONSULT Gateway	27/11/2020
A.3.2	Stage 3 Gateway was initially held on 30 October 2020 and Gateway assessment meeting concluded that the Stage 3 gateway had not been passed, predominantly on Consultation grounds. There were 8 findings that were not proportionate to be considered as post-gateway rectification items. The change sponsor re-submitted the required documentation for November Gateway, and I was satisfied that the requirements of the CAP1616 process had been met up to that point. Progress to the next Step of the process was approved.	
A.4	Stage 4 UPDATE & SUBMIT	08/02/2021
A.4.1	The change sponsor formally submitted their proposal, which included all of the required documentation.	
PART B – Consultation Assessment		
B.1	AUDIENCE	
B.1.1	Did the consultation target the right audience?	YES
	The same set of aviation and non-aviation stakeholders who participated in Stages 1-2 were targeted and asked to respond to the consultation. Some stakeholders who were not on the original stakeholder list, but had replied during Stages 1 and 2, were	

	<p>also added to the list. At the consultation launch, the change sponsor targeted an audience of 150+ stakeholders (where multiple individuals were identified from the same organisation, they were counted as a single stakeholder) including:</p> <p><u>Non-Aviation stakeholders</u></p> <ul style="list-style-type: none"> • Local communities • Regional and Combined Authorities • Community/Town and Parish Councils • Local Landowners <p><u>Aviation stakeholders</u></p> <ul style="list-style-type: none"> • SAC-based operators • Local GA • MOD via DAATM, including local military airfields • ANSPs • National Organisations • Space companies • UAV operators <p><u>Environmental stakeholders</u></p> <ul style="list-style-type: none"> • National Trust • Snowdonia National Park <p>In their consultation strategy the change sponsor stated that feedback from all individuals or organisations who respond will be accepted, but only the targeted (as outlined above) stakeholders will be contacted directly.</p> <p>The change sponsor provided a list of stakeholders that they consulted with in Appendix B of their document entitled Consultation Review (Step 3D).</p>
B.1.2	Please provide a summary of responses below
	<p>A total of 140 responses were received over the course of the 7-week consultation. 137 responses were submitted via the Airspace Change Portal (Citizen Space) and 3 responses were received by the change sponsor by post/email. The latter wasn't manually uploaded to the Citizen Space, but the sponsor included copies of those</p>

responses in 'Annex 4 – Additional Stakeholder Comments and Correspondence' that is published on the portal (and therefore available to the public), and are referenced in the post-consultation report.

The following table shows how stakeholders were asked to express whether they supported the proposed changes together with the number of responses received to this mandatory question:

Option	Total	Percent
SUPPORT – I support the proposed changes	83	59.29%
NEUTRAL – I neither support nor object	18	12.86%
OBJECT – I object to the proposed changes	36	25.71%
NO COMMENT – I have no comment to make on proposed changes	3	2.14%

Stakeholders could then opt to indicate whether they supported or objected a particular option. Overall, Design Option 2 was supported or strongly supported by 68 (49%) respondents and Design Option 1 was supported or strongly supported by 58 (41%) respondents.

Responses were received from a mix of stakeholders as shown in the table below:

Stakeholder type	Number of responses*
Local respondents within the DA (postcodes LL42 to LL47)	32
Other North Wales respondents (other LL postcodes)	35
General and Recreational Aviation respondents	23
Commercial Aviation respondents	13
Professional and Public Body respondents	21
RDT&E community respondents	30

*Of the total 140 respondents, a number of these have been classified by the change sponsor in more than one subcategory – e.g. a local resident could also be part of the General Aviation community etc.

One of the key stakeholders to this proposal, MOD, objected to this ACP, whereas QinetiQ that works in partnership with the MOD stated a neutral position to both Option 1 and Option 2.

11 out of 36 objections had no comments to support their objections. 25 (out of 36) were received in the final six hours as the result of co-ordinated action by a local business, as stated by the change sponsor. 20 (out of those 25)

	were from respondents out of the area, 50 miles away.
	Some consultation responses highlighted that Letters of Agreement (LoAs) must be established. The change sponsor confirmed that LoAs with RAF Valley, with MOD/QinetiQ to access D201 (current LoA also makes reference to D202 but is not included as part of this ACP), and Snowdonia Sky Sports will be produced.
B.2	APPROACH
B.2.1	Did the change sponsor consult stakeholders in a suitable way? YES
	The change sponsor conducted their consultation using Citizen Space and as a result their consultation was aligned with CAP 1616 requirements. Stakeholders were also given the option to submit responses by post with the postal address included within the consultation document.
B.2.2	What steps did the change sponsor take to encourage stakeholders to engage in the consultation?
	<p>The following steps were taken to encourage stakeholders to engage in the consultation:</p> <ul style="list-style-type: none"> - The change sponsor conducted a number of both pre-launch and post-launch online briefings/meetings with key local stakeholder groups (Local Community Councils, Gwynedd Council, local Airport Operators, RAF Valley community, MOD, DAATM) to make them aware of the consultation start and to ask for their support in communicating the consultation to as many people as possible. Minutes of those meetings were provided. - Stakeholders were sent a launch email on 7 December 2020. The email was in English and in Welsh and provided the opening and closing dates of the consultation and signposted stakeholders to the consultation material and questionnaire available on the airspace change portal. - Email reminders were sent to all stakeholders on 21st December 2020 (2 weeks after the launch), 5th January (mid-way through), 11th and 18th January 2021. All reminders were in English and in Welsh. A general public reminder was published in the Cambrian News on the 14th January 2021 and via the Gwynedd Council social media feeds at mid-point of the consultation and via SAC social media page on 4th January (mid-point) and 18th January (final week of the consultation). - There was a series of public promotions throughout the first week of launching the consultation. The original SAC press release (again available in English and in Welsh languages) and / or follow-up reminders were featured in the following publications and media channels: <ul style="list-style-type: none"> o Snowdonia Aerospace social media feed o Cambrian News

	<ul style="list-style-type: none"> ○ Gwynedd Council website and social media feed ○ ARPAS-UK website and social media feed (drone trade association) ○ sUAS News website (drone magazine) and UAS Vision website (drone magazine) ○ Pilot website (GA magazine) and Flyer website (GA magazine) ○ A number of other publications including Aerospace Testing International, North Wales Chronicle, Insider Media websites and Microlight Flying Magazine <p>- Following on from the press/media promotion, the sponsor held a series of three stakeholder events at the Snowdonia Aerospace Centre to allow people to drop-in and discuss the consultation in person. One of the events was held on Saturday and one was designated as a Welsh language event with a translator available to facilitate questions and answers. In total, 43 visitors attended across three days. Amongst local residents, the representatives of Llanbedr Community and Gwynedd County Councils, Snowdonia Sky Sports, Snowdonia Flight School and Snowdonia Society also attended the events.</p> <p>- The change sponsor was also extending a meeting invite to some stakeholders to discuss their individual concerns, although not all stakeholders responded to the change sponsor's offer (e.g. Harlech Estate).</p> <p>Evidence has been provided by the change sponsor to support all of the steps set out above.</p> <p>Stakeholders were also able to submit a postal response.</p> <p>The sponsor also posted responses in English and Welsh to Frequently Asked Questions (FAQs) on the portal where common themes emerged.</p>	
B.2.3	Was the change sponsor required to respond to any unexpected events and/or challenges?	YES
	<p>The sponsor stated that they did not have to respond to any unexpected events, however the sponsor contacted the CAA for guidance on a couple of issues:</p> <ul style="list-style-type: none"> • Fellowship of Reconciliation in Wales wrote to the change sponsor requesting to pause the consultation until all the consultation materials have been translated into Welsh and then re-start it with a further 7-week duration. The change sponsor queried the use of the Welsh language in their ACP documentation and the Airspace Change Portal with the CAA and the CAA's position was that the portal could not support the Welsh language and the CAA could not verify documentation in Welsh. The change sponsor accommodated for bilingual need as reasonably as possible by providing a Welsh language version of the consultation Easy Read Guide, by publicising one of the public drop-in sessions as a Welsh language event, with a Welsh 	

	<p>translator available on site and by issuing a launch email and all reminder emails in both languages.</p> <ul style="list-style-type: none"> • Natural Resources Wales has stated that they expected a Habitat Regulation Assessment (HRA) to be conducted. The CAA’s Office of the General Counsel confirmed that the response needed to come from CAA. • A number of late coordinated objections. • Some respondents had difficulty with the link to access the airspace change online portal. The alternative link was provided (along with the original link) in the last two reminder emails (on 11th and 18th January).
B.3	MATERIALS
B.3.1	What materials were used by the change sponsor during the consultation?
	<p>The change sponsor utilised the CAA’s Airspace Change Portal (Citizen Space) to create an associated consultation page and four primary materials were made available for stakeholders to view:</p> <ul style="list-style-type: none"> • Consultation Document - Consultation Document introduced the CAA Airspace Change Process and an explanation of the purpose of the ACP-2019-58 consultation. It then described the specifics of the proposal, including the baseline situation, the airspace design options considered and its suggested benefits and impacts. It concluded with a description of how stakeholders could participate. The Consultation Document sought to make it clear to all stakeholders that the consultation related solely to ACP-2019-58 seeking a Permanent DA to support RDT&E operations and did not relate to ACP-2020-02 which is specific to supporting ongoing and future military aircraft training. • Feedback questionnaire (within the Consultation Document) – stakeholders were asked whether they supported, had no comment, were neutral or objected to the airspace changes in the proposal. They were invited to rank their reaction to the two options presented (Option 1 was considered to be easier to interpret and to provide greater flexibility for operators using the DA; Option 2 was considered to be more complex but offered more advantages in terms of flexible use of airspace (FUA)) in the following way: strongly support, support, neutral, object or strongly object. Stakeholders were also invited to suggest any mitigations or alterations whether they supported or objected the proposal. Free-text boxes for comments were provided. • Easy Read Guide – a non-technical quick explanation of the airspace change proposal available in both, English and Welsh, languages as an adjust to the main Consultation Document. • Full Options Appraisal – included environmental analysis of noise and emission impacts, a summary of which was also included in the main Consultation Document. • Consultation Strategy <p>The change sponsor uploaded their consultation documents to the Citizen Space platform, as referenced in B.2.1 above and invited stakeholders to submit their feedback using the questionnaire provided. Their landing page</p>

	included an overview of the proposal, details on the stakeholder events and several links signposting stakeholders to more information.	
B.3.2	Did the materials provide stakeholders with enough information to ensure that they understood the issue(s) and potential impact(s) on them?	YES
	<p>Consultation targeted a wide range of stakeholders and the change sponsor acknowledged the needs/requirements of the various groups of stakeholders within their consultation strategy. The sponsor developed their consultation materials accordingly; they were comprehensive and explained technical aspects together with environmental impacts in a way that could be understood by a reader without aviation knowledge or expertise. Maps of both options along with a table of estimated annual daily usage of DA sub-areas were included to help stakeholders to understand where the RDT&E activities were planning to take place and to identify the areas they were most likely to be affected by. Some of the feedback gathered during Stages 1 and 2 of the engagement was also covered within the consultation document.</p> <p>The materials were considered to provide enough information to enable all consultees to make an informed decision.</p>	
B.4	LENGTH	
B.4.1	Please confirm the start/end dates and the duration of the consultation below	
	<p>Start date: Monday 7th December 2020 End date: Friday 22nd January 2021 Duration: 7 weeks, spanning over Christmas holiday</p>	
B.4.2	If duration was less than 12 weeks, what was the justification?	
	<p>Whilst acknowledging that an airspace change consultation would typically have a 12-week duration, the sponsor proposed a shortened 7-week consultation period, comprising of 3-weeks before Christmas and New Year and 3-weeks after.</p> <p>In the change sponsor's view, a reasonable and proportionate duration for this consultation was 6 weeks. However, given that the period would span the Christmas/New Year holidays, the change sponsor proposed to extend this to a 7-week period and considered it most appropriate. Quoted from Para 2.2. of the sponsor's consultation strategy, the following justification was provided:</p> <ol style="list-style-type: none"> 1. <i>"A previous 5-week, pre-CAP1616 consultation, conducted in August 2014 to support the original Temporary Danger Area (effectively Design Option #1), was sent to 87 aviation and non-aviation stakeholders. Of these 87, 71 (82%) did not respond, whilst a total of 18% did respond, with 5 (6%) were in favour of the proposal, 2 (2%) were against the proposal and 9 (10%) were assessed as neutral;</i> 2. <i>The ACP-2019-58 Stage 1 and 2 engagement process reached out to in excess of 200 (individual) aviation and</i> 	

	<p><i>non-aviation stakeholders in May and June 2020. Again, the response rate was less than 20%. Where individuals/groups have replied during Stages 1 and 2 and were not on our original Stakeholder List these have now been added to the Stakeholder List thereby increasing the number of Stakeholders to be included at this Stage;</i></p> <ol style="list-style-type: none"> <i>3. The local population within the footprint of the ACP is very low. There are only 645 people documented as permanent residents in the closest village of Llanbedr (from the 2011 census, 2.3km from main runway centre point) and there is only a total of 6,800 people (approximately) resident in all of the neighbourhoods that sit wholly or partially within the area covered by the ACP (LL42 to LL47 postcodes inclusive) with a population density <50 people per square km;</i> <i>4. A large element of this population has already been engaged through local councils as part of the initial Stage 1 and 2 activities;</i> <i>5. The consultation strategy is geared toward reaching as many stakeholders as possible in the first three weeks of the consultation process and pre-briefing key stakeholders who can help share the message;</i> <i>6. The Temporary Danger (TDA) Area has been promulgated on a number of occasions over the past 5 years and there has been no complaints or concerns raised by any stakeholders during these periods of use. The aviation history associated with the site is such that changing the designation of the Danger Area from Temporary to Permanent is likely to be seen as “business as usual” by most of the local population;</i> <i>7. Whilst this ACP relates to a Permanent Danger Area, the impact on aviation and non-aviation stakeholders is likely to be similar to that for a Temporary Danger Area and current CAA policy advises that a 6-week engagement could be considered appropriate;</i> <i>8. The application by SAC is not a standard Level 1 Change with the classification not being of a typical scale and impact of a Level 1 Change. The actual proportionate scale of change resulting from the application is considered in all circumstances as negligible;</i> <i>9. SAC regularly engage with a range of airspace users and stakeholders throughout the year regarding its development and planned activities consequently there is an ongoing understanding of the operations being undertaken at the airfield;</i> <i>10. SAC have through planning process actively engaged (and continue to do so regarding its ongoing development programme) with a number of stakeholders and the community in relation to the airfield operations and activities”.</i> 		
B.4.3	<table border="1" style="width: 100%;"> <tr> <td style="width: 80%;">Was the period of consultation proportionate?</td> <td style="background-color: #76b82a; color: white; text-align: center;">YES</td> </tr> </table>	Was the period of consultation proportionate?	YES
Was the period of consultation proportionate?	YES		
	<p>Due to the scope and level of impact of this proposal, the change sponsor’s justification and proposed approach to generate an appropriate level of response, the CAA considered that the period of consultation was proportionate and accepted it at the Stage 3 gateway on one condition; should responses indicate that the response window is short, the sponsor would need to consider extending the consultation period.</p>		

	Apart from one response from a local stakeholder asking for the consultation to be extended and for extensive advertising of the proposal, there weren't any requests for a longer consultation period. As outlined in B.2.2. above, there was a series of public promotions and reminders.	
B.5	GENERAL	
B.5.1	Was the conduct of the consultation aligned with the consultation strategy?	YES
	The conduct of the consultation was aligned with the consultation strategy.	
B.5.2	Has the change sponsor categorised the responses in accordance with CAP 1616?	YES
	<p>140 responses were received. The change sponsor adopted a “We asked, you said, we did” approach. The responses were categorised in accordance with the requirements of CAP 1616, although the elements were categorised into three types rather than two:</p> <ul style="list-style-type: none"> • Category A responses included responses that had impacted the proposed airspace design; • Category B responses had not directly impacted the airspace design itself, but were considered for subsequent operation of the DA; and • Category C responses had not impacted the proposed design nor its operation. <p>Initially, the change sponsor had been inconsistent in their approach to categorise the responses. Some responses with the same context were in different categories – e.g. one was in Category B whereas the other one in Category C. There were also a few responses that should have been in Category A or B by the sponsor’s own definition of the categories, but they were in Category C. The change sponsor reviewed their categorisation and achieved a more transparent and consistent categorisation.</p> <p>The change sponsor has identified 7 Category A responses and determined that these had the potential to impact the final proposal. Responses from 30 stakeholders were captured as considerations for operation of the proposed DA (Category B). There were actually 32 responses, and while the sponsor has addressed those 2 responses in the Annex 4 ‘Additional Stakeholder Comments & Correspondence’, they forgot to reflect the changes in the Annex 5 ‘Response Categorisation Spreadsheet’.</p> <p>Whether it was Category A or B response, the change sponsor has taken them forward to Stage 4 to address issues raised in those responses (as outlined in B.5.4 below).</p>	
B.5.3	Has the change sponsor correctly identified all of the issues raised during the consultation and accurately captured them in the consultation response document?	YES

	The raw consultation data has been reviewed. The change sponsor correctly identified all the issues raised by consultees and accurately captured them for each stakeholder type (as outlined in B.1.2) in their Consultation Review (Stage 3D) document.	
B.5.4	Does the consultation response document detail the change sponsor's response to the identified issues?	YES
<p>A few issues were raised in Category A feedback identified by the change sponsor as having the potential to impact the final design, and the change sponsor amended the airspace design to address those issues:</p> <p><u>A need to simplify the definition of the DA areas on the eastern side of the airfield to better allow GA aircraft to transit north-south.</u></p> <p>Response: Shapes of Areas E and F have been redesigned and simplified to improve GA transit to the east when Areas A, B and / or F are activated. In addition, the sponsor does not plan to activate Areas B and F at the same time as Area E, and so should a north-south GA transit be required on a few days a year when Area E is activated (estimated 6 days/year), it will be possible to the west of the airfield.</p> <p><i>NOTE:</i> Within the consultation document Area E1 segment of Option 2 was defined as follows; "It is proposed that this area remains outside of the DA to keep experimental aircraft clear of the Rhinog mountains".</p> <p>Within the formal submission document Area E1 segment of the revised Option 2, now proposed as Option 2b, is defined as follows; "<i>an arc of 5 nautical miles outer radius, centred on the main runway 17/35, that extends the Danger Area to the east of the railway line and A496 main road toward the Rhinog mountains, from surface to 2000 feet AMSL. It is intended that a minimum altitude of 500 feet above ground level (AGL) will be maintained in this area at all times</i>". While Area E1 is now included in DA Option 2b design, the sponsor assumes that nobody will be able to fly in that area due to terrain up to 1900 feet AGL. However, while this revised statement is clearer for those stakeholders with a technical background, it is potentially confusing for non-aviation stakeholders (evidenced in one of the consultation responses).</p> <p><u>A need to deconflict military and civil aviation in close proximity to D201 Cardigan Bay Danger Area. MOD highlighted that RAF Valley aircraft require to transit closer to the coastline than Area D and suggested to extend a low-level corridor under Area C as well.</u></p> <p>Response: The change sponsor has taken this design suggestion into consideration. Instead of creating a separate low-level corridor under Area C in the same way as it was created for Area D, and as suggested by MOD, the change sponsor has reduced the Area C by extending the Area D, which also increases buffer to D201. The sponsor also stated that making it easier for GA to pass to the east of the airfield (as outlined in the first issue above) will remove the need for GA traffic to divert far out to the west and transit through Area D and consequently will leave area close to D201 DA clear for military aircraft and reduces the risk of potential funnelling and inadvertent penetrations of D201.</p> <p><u>Access to / from D201 Cardigan Bay Danger Area and ATS provision</u></p>		

Response: Within the Revised design (Stage 4A) document, the change sponsor has provided a justification why they believed the provision of DAAIS (compared to DACS) would be sufficient. The change sponsor has confirmed that an LoA will be produced on accessing D201 and utilising of ATM services within the D201 Danger Area.

There were also several issues raised in Category B feedback identified by the change sponsor as not having a direct impact on the airspace design itself, but on subsequent operation of the DA:

Priority access for emergency services

Response: The change sponsor has confirmed that this is guaranteed, and emergency services will take priority at all times.

Timely notification of DA activation

Response: The change sponsor has confirmed that there will be formalised process / planning meetings established with RAF Valley to provide 14 days' advance notice of any activities planned in the DA. Any activity will then be confirmed at 7 days' notice. Each segment of the DA will be notified by NOTAM 24 hours prior to activation and will only be active for the minimum time necessary. Airfield contact details will be included in the NOTAM.

Weekend and out-of-hours operations available for general and recreational aviation activities:

Response: The change sponsor has confirmed that normal operating hours for novel aerospace activities within the Danger Area will be 0900 to 1700, Monday to Friday, apart from rare and exceptional circumstances which would result in a requirement to access the DA outside of these times.

Minimal overland operation, particularly over properties

Response: To mitigate/minimise any impacts, the change sponsor has confirmed that it will be a small number of days when the DA will be activated over land, and sorties will be kept as short as possible on those days. Operating height will be assessed to minimise noise above daytime rural ambient. If any sites are to be suggested as being particularly sensitive, the sponsor will avoid overflying them. The change sponsor also commits not to schedule any activities to overfly properties.

Minimal disruption to nearby maritime and land-based activities (this issue raised most of the objections)

Response: The change sponsor has confirmed that there is no plan and no current requirement for an associated marine traffic exclusion zone and all marine activities will be able to continue safely when the Danger Area is active. In a similar manner, there will also be no constraints on land access.

No military activity

	<p>Response: The change sponsor has confirmed that the primary need for this Danger Area is to increase support to the RDT&E for next-generation UK aerospace – e.g. drones, electrical aircraft, balloons etc, and military training is out of this ACP’s scope. The sponsor has reiterated this point in their response to each stakeholder who raised a concern on any military use of the site. That said, the response to BAE Systems states this ACP “has been predicated on the increased need for novel aerospace system testing in the UK, the majority of which is civil aerospace, but this is not a hard constraint”.</p>	
B.5.5	Is the change sponsor’s response to the issues raised appropriate/adequate?	YES
	<p>The change sponsor’s response to the issues raised is appropriate; the sponsor made modifications to the Danger Area design (where necessary) to address the issues raised in responses. Furthermore, the change sponsor confirmed that Letters of Agreement with RAF Valley, with MOD / QiniteQ and Snowdonia Sky Sports will be produced to alleviate any potential conflicts and issues and to ensure that the airspace will be utilised as effectively as possible whilst mitigating the impact on the stakeholders.</p> <p>The sponsor could have provided more than an acknowledgment to some of the objection responses.</p>	
B.5.6	Is the formal airspace change proposal aligned with the conclusions of the consultation response document?	YES
	<p>The sponsor’s 3D and 4A documents have been cross checked with their 4B document ‘Airspace Change Proposal’. At the end of Step 4A no re-consultation was required, the conclusions of the consultation response document along with the change sponsor’s response/commitments are aligned with the formal airspace change proposal. The formal proposal does not contain any material that has not been consulted upon.</p>	
B.6	RECOMMENDATIONS/CONDITIONS/PIR DATA REQUIREMENTS	
B.6.1	Are there any Recommendations which the change sponsor should try to address either before or after implementation (if approved)? If yes, please list them below.	YES
	<p><i>GUIDANCE NOTE:</i> Recommendations are something that the change sponsor should try to address either before or after implementation, if indeed the airspace change proposal is approved. They may relate to an area in which the change sponsor is reliant upon a third party to actually come to an agreement and consequently they do not carry the same ‘weight’ as a Condition.</p> <p>The change sponsor should inform the stakeholders of the decision (when published) and what will happen next.</p>	
B.6.2	Are there any Condition(s) which the change sponsor must fulfil either before or after implementation (if	YES

	approved)? If yes, please list them below.	
	<p>GUIDANCE NOTE: Conditions are something that the change sponsor must fulfil either before or after implementation, if indeed the airspace change proposal is approved. If their proposal is approved, change sponsors must observe any condition(s) contained within the regulatory decision; failure to do so will usually result in the approval being revoked. Conditions should specify the consequence of failing to meet that condition, whether that be revoking the ACP or some alternative.</p> <ul style="list-style-type: none"> All LoA's mentioned in B.1.2 must be agreed and signed prior to implementation. Limit an activation of Area E to 6 days per year. Not only Area E was a concern to local residents, but also to the GA community. As outlined within the submission, the change sponsor anticipates that Area E will not need to be activated for more than 6 days a year, therefore this condition is a proportionate and reasonable mitigation to address concerns of local communities as well as to provide for GA aircraft north-south transitions. 	
B.6.3	Are there any specific requirements in terms of the data to be collected by the change sponsor for the Post Implementation Review (if approved)? If yes, please list them below.	YES
	<p>GUIDANCE NOTE: PIR data requirements concerns any specific data which the change sponsor should be instructed to collate post-implementation, if indeed the airspace change proposal is approved. Please use this section to list any such requirements so that they can be captured in the regulatory decision accordingly.</p> <ul style="list-style-type: none"> The change sponsor is required to collate related stakeholder observations (enquiry/complaint data) and present it to the CAA. Any location/area from where more than 10 individuals have made enquiries/complaints must be plotted on maps. The change sponsor is required to collate an actual number of activations for all eleven Danger Area segments. The sponsor committed not to overfly any properties and/or any sites that may be suggested as being sensitive. The sponsor therefore is required to collate and present to the CAA instances where any of those sites were overflowed. 	
PART C – Consultation Assessment Conclusion(s)		
C.1	Does the consultation meet the CAA's regulatory requirements, the Government's guidance principles for consultation and the Secretary of State's Air Navigation Guidance?	YES
	The fundamental principles of effective consultation are targeting the right audience, communicating in a way that suits them,	

and giving them the tools to make informative, valuable contributions to the proposal's development. I am satisfied that these principles have been applied by the change sponsor before, during and after the consultation. I am also satisfied that the change sponsor has conducted this consultation in accordance with the requirements of CAP 1616, that they have demonstrated the Government's consultation principles and that the consultation has:

- **Taken place when the proposal was at a formative stage** – initially evidenced by the sponsor presenting two design options, stating that both options would be practicable for future business, and leaving it up to stakeholders to provide any feedback on the impact this proposal could have on them and any suggestions they may have to influence the final designs. Later evidenced by the post-consultation modifications that were made to the danger area design and the final proposal.
- **Presented the consultation material clearly and outlined the potential impacts that needed to be considered** – evidenced by the consultation material being comprehensive and explaining technical aspects together with environmental impacts in a way that could be understood by a reader without aviation knowledge or expertise. Maps of both options along with a table of estimated annual daily usage of DA sub-areas were included to help stakeholders to understand where the RDT&E activities were planning to take place and to identify the areas they were most likely to be affected by. The materials provided enough information to enable all consultees to make an informed decision.
- **Provided a sufficient timeframe to allow considered responses**
- **Taken into account the product of the consultation** – evidenced by the change sponsor correctly identifying all the issues raised by consultees, accurately capturing them and making modifications to the design (where necessary) to address those issues.

PART D – Consultation Assessment Approval

	Name	Signature	Date
Consultation assessment completed by (Airspace Regulator – Engagement and Consultation)	[REDACTED]	[REDACTED]	23/04/2021
Consultation assessment approved by (Manager Airspace Regulation)	[REDACTED]	[REDACTED]	17/05/2021

PART E – Head AAA – Comment/Approval

Approved. Please see Operational Assessment for further comments.

Name	Signature	Date
[REDACTED]	[REDACTED]	04/06/2021