Exeter Airport Airspace Change Proposal

Design Principles – Supplementary Questionnaire

Date: **6th August 2019**

Revision: **Issue 1**

Document Ref: **71189 023**

Document Details

Reference	Description
Document Title	Exeter Airport Airspace Change Proposal
	Design Principles – Supplementary Questionnaire
Document Ref	71189 023
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Issue	Amendment	Date
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Exeter Airport Airspace Change Proposal

Introduction

Exeter Airport is very grateful to those stakeholders who have already engaged with the process and for all of the views that have been provided by the various representative bodies and individuals. We now need your further help. During the recent engagement activities i.e. the stakeholder questionnaires sent out in April, and the Focus Groups held in June, at least two stakeholder organisations raised questions about why Exeter Airport was not considering changes to arrival and departure routes at the airport.

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Therefore, following advice from the CAA, EDAL has broadened the scope of this Airspace Change Proposal (ACP) to enable the Airport to consider, without prejudice or commitment, the introduction of Performance Based Navigation (PBN) arrival and departure routes, linking the current PBN approach procedures with the en-route airways entry and exit points. These routes will improve predictability of aircraft tracks which may increase safety for all airspace users.

This change to the ACP scope does not commit EDAL to implementing PBN approaches as part of the ACP, only that we are required to consider and assess it as part of the CAP1616 options development process.

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Initial List of Design Principles

The various responses received to the initial questionnaires and focus group meetings has helped Exeter Airport to derive an initial list of Design Principles, as shown in Table 1 below, that will be used as the qualitative framework against which the possible airspace design options will be developed.

Proposed Design Principle
Any new airspace should not restrict flying operations in or around the airspace
Airspace should be designed to minimise the impact of noise
Any new airspace should not create funnelling or choke points for other airspace users
Airspace should connect to the airways structure to protect Commercial Air Transport
Any new airspace should use the minimum volume necessary
Any new airspace should facilitate continuous climb and descent profiles
Any new airspace should allow equitable access to all airspace users
Consider the Flexible Use of Airspace
New airspace should protect critical stages of flight
Create a known traffic environment
Designs should consider areas of local tranquillity
Accommodate traffic with limited/no Radio Capability
Accommodate traffic without Transponder Capability
Any new CAS should be proportionate to the requirement
Any new airspace should use the minimum categorisation necessary
Any new airspace should be as uncomplicated as possible

Table 1 – Initial List of Design Principles.

Stakeholder Response Requirements

Given the change in scope of this project, Exeter Airport would like to re-engage with its local stakeholders to see if their views have changed. Whilst some of the Design Principles listed in Table 1 will be pertinent to airspace designs that include flight procedures, stakeholders may wish to provide different answers or views to their original questionnaire returns. Exeter Airport would like stakeholders to assist in the development of the Design Principles in the following way:

- Provide any updated responses to the original Design Principles questionnaire that was distributed in late-April, based on the inclusion of PBN arrival and departure routes (We have not included a copy of the original Design Principles Questionnaire; if you would like a copy to be sent, please get in touch via the e-mail address below).

- Provide answers to the additional questions in Table 2 below.

- Please complete Table 3 to suggest any new Design Principles that you think would be relevant to the change in scope of this Airspace Change Proposal and should be considered by Exeter Airport. Please also state any areas of concern that you feel have not been considered during this process.

Points for Your Consideration

The following points for consideration provide some further explanation that may help you when considering your responses with respect to the inclusion of Instrument Flight Procedures at Exeter Airport.

Performance Based Navigation Procedures

PBN procedures make use of satellite technology to better guide aircraft over the intended track across the ground. When using routes defined by accurate Global Navigation Satellite System (GNSS) waypoints, it is important to understand that aircraft will follow the new published routes more accurately and consistently than they currently follow conventional routes. This improved track-keeping accuracy means aircraft will be less dispersed either side of each route. Therefore, fewer locations will be directly overflown, but there will be an increase in the concentration of over-flights in those areas directly beneath the new published routes. It may therefore be possible to formulate designs that minimise the numbers of new people overflown by designing procedures over less populated areas, or by designing procedures that distribute noise over different areas, i.e. over more people, but at less frequent intervals.

Urban and Rural Areas

You may wish to consider the advantages and disadvantages of designing routes that are planned to overfly either urban or rural areas. Flights over more sparsely populated areas may seem to be the best alternative. However, you may also wish to consider the levels of background noise when balancing the urban and rural alternatives. Aircraft flying over urban areas will pass over a larger number of people and residences. However, in urban areas the levels of background noise are likely to be much higher than in rural areas. Consequently, aircraft noise may be masked because of higher noise levels associated with traffic and many other background activities common in urban locations.

Open Areas

In many urban locations you may feel it is important to protect quiet or open areas (e.g. parks) by designing flight procedures that avoid these areas. However, in large urban areas it may not be possible to avoid overflight of quiet areas and, at the same time, also avoid overflight of more densely populated areas. This may be because of the proximity of runways to urban areas or to the orientation of the runway itself.

Noise and Emissions

An aircraft flying a straight line directly from one location to another is the most efficient routing option because it represents the shortest distance and time between locations. When flying a longer route between the same locations (perhaps to minimise noise impacts in a sensitive area) the distance and time of the flight will increase, as will the fuel burn and associated emissions into the atmosphere. When answering the questions, please consider this balance between noise and emissions in general terms.

How to Respond

Please save the file that includes your responses and attach to an email to the following address:

acpexeterenquiries@exeter-airport.co.uk

In addition to the word file, we will accept scanned, hand-written responses or email responses as long as they are legible and clearly identify the question to which your response relates.

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Exeter & Devon Airport Ltd
Clyst Honiton
Exeter
EX5 2BD

Please respond by mid-day Friday 6th September 2019.

Stakeholder Response

Your Responses

Please provide your responses in line with the information provided in paragraph 1.3. Please use as much space as you require, the size of the response box will expand as you type your response.

Representative Organisation:
Bishops Clyst P C

Question
Q1 - Please tell us if the dispersal of noise impacts across a greater number of households is preferable than the concentration of noise impacts on a smaller number of households.
It would be preferable to keep noise dispersal as it is, with southbound departing traffic flying following the rivers Clyst and Exe, thus avoiding built up areas, and especially not to overfly Clyst St Mary village.
Q2 - Please tell us if there are there any aircraft operational constraints that Exeter Airport should consider when planning its new inbound and outbound procedures? (restrictive speeds, distances, climb rates, rates of descent, etc.) Please provide details and reasons.
There is aneed to revue noisy, private light aircraft overflying Clyst St. Mary village at low altitude on fine summer days. This generates most grumbles from the public.
Q3 – Do existing noise abatement procedures meet current and future local government and community requirements?
Not qualified to comment, but any significant increase in noise would not be acceptable.
Q4 - Are there any other local issues or constraints you feel should be considered by Exeter Airport that will guide the development of options for the geographical location of arrival and departure procedures at Exeter Airport?
Avoid overflying Clyst St Mary village by departing aircraft.

Table 2 – Stakeholder Supplementary Questions

Are there other Design Principles that you feel should be considered?
Avoid any night flying.

If there are any other areas of concern that you feel have not been considered, please provide additional comments below.
Aircraft noise should not interfere with C.S.M. Primary School. Our parish includes the village of Sowton, which is closer to the airport and its operations, so the above comments are just as relevent, or more so there.

Table 3 – Additional Comments

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1.1 Introduction

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1.2 Initial List of Design Principles

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Table 1 – Initial List of Design Principles.

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- Provide any updated responses to the original Design Principles questionnaire that was distributed in late-April, based on the inclusion of PBN arrival and departure routes (We have not included a copy of the original Design Principles Questionnaire; if you would like a copy to be sent, please get in touch via the e-mail address below).

- Provide answers to the additional questions in Table 2 below.

- Please complete Table 3 to suggest any new Design Principles that you think would be relevant to the change in scope of this Airspace Change Proposal and should be considered by Exeter Airport. Please also state any areas of concern that you feel have not been considered during this process.

1.4 Points for Your Consideration

The following points for consideration provide some further explanation that may help you when considering your responses with respect to the inclusion of Instrument Flight Procedures at Exeter Airport.

1.4.1 Performance Based Navigation Procedures

PBN procedures make use of satellite technology to better guide aircraft over the intended track across the ground. When using routes defined by accurate Global Navigation Satellite System (GNSS) waypoints, it is important to understand that aircraft will follow the new published routes more accurately and consistently than they currently follow conventional routes. This improved track-keeping accuracy means aircraft will be less dispersed either side of each route. Therefore, fewer locations will be directly overflown, but there will be an increase in the concentration of over-flights in those areas directly beneath the new published routes. It may therefore be possible to formulate designs that minimise the numbers of new people overflown by designing procedures over less populated areas, or by designing procedures that distribute noise over different areas, i.e. over more people, but at less frequent intervals.

1.4.2 Urban and Rural Areas

You may wish to consider the advantages and disadvantages of designing routes that are planned to overfly either urban or rural areas. Flights over more sparsely populated areas may seem to be the best alternative. However, you may also wish to consider the levels of background noise when balancing the urban and rural alternatives. Aircraft flying over urban areas will pass over a larger number of people and residences. However, in urban areas the levels of background noise are likely to be much higher than in rural areas. Consequently, aircraft noise may be masked because of higher noise levels associated with traffic and many other background activities common in urban locations.

1.4.3 Open Areas

In many urban locations you may feel it is important to protect quiet or open areas (e.g. parks) by designing flight procedures that avoid these areas. However, in large urban areas it may not be possible to avoid overflight of quiet areas and, at the same time, also avoid overflight of more densely populated areas. This may be because of the proximity of runways to urban areas or to the orientation of the runway itself.

1.4.4 Noise and Emissions

An aircraft flying a straight line directly from one location to another is the most efficient routing option because it represents the shortest distance and time between locations. When flying a longer route between the same locations (perhaps to minimise noise impacts in a sensitive area) the distance and time of the flight will increase, as will the fuel burn and associated emissions into the atmosphere. When answering the questions, please consider this balance between noise and emissions in general terms.

1.5 How to Respond

Please save the file that includes your responses and attach to an email to the following address:

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Please respond by mid-day Friday 6th September 2019.

2 Stakeholder Response

2.1 Your Responses

Please provide your responses in line with the information provided in paragraph 1.3. Please use as much space as you require, the size of the response box will expand as you type your response.

Representative Organisation:
British Helicopter Association

Question
Q1 - Please tell us if the dispersal of noise impacts across a greater number of households is preferable than the concentration of noise impacts on a smaller number of households.
Your Response: Dispersal is the preferred solution.
Q2 - Please tell us if there are there any aircraft operational constraints that Exeter Airport should consider when planning its new inbound and outbound procedures? (restrictive speeds, distances, climb rates, rates of descent, etc.) Please provide details and reasons.
Your Response: If possible, include a PinS approach which will allow GA and helicopter IFR traffic to do proceed VFR approaches / cloud breaks which do not interact with CAT IFR traffic
Q3 – Do existing noise abatement procedures meet current and future local government and community requirements?
Your Response: No experience of your current noise abatement procedures
Q4 - Are there any other local issues or constraints you feel should be considered by Exeter Airport that will guide the development of options for the geographical location of arrival and departure procedures at Exeter Airport?
Your Response: Avoid the urban area of Exeter and areas of outstanding natural beauty

Table 2 – Stakeholder Supplementary Questions

Are there other Design Principles that you feel should be considered?
Your Response: You have not mentioned the word 'safety' in any of your principles. The current level of safety should be at least maintained, if not improved, by the new procedures and for all airspace users in the local area.
If there are any other areas of concern that you feel have not been considered, please provide additional comments below.
Your Response: Outside of Exeter's operating hours there are no options within 30 nm for GA and helicopter traffic to carry out a cloud break, hence, the request for a provision of a PinS approach to proceed VFR

Table 3 – Additional Comments

Exeter Airport Airspace Change Proposal

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New airspace should protect critical stages of flight
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Designs should consider areas of local tranquillity
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Table 1 – Initial List of Design Principles.

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1.4 Points for Your Consideration

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2 Stakeholder Response

2.1 Your Responses

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Representative Organisation:
Devon Air Ambulance

Question
Q1 - Please tell us if the dispersal of noise impacts across a greater number of households is preferable than the concentration of noise impacts on a smaller number of households.
Your Response: Difficult to see how you can disperse noise impact if you have set routes in / out. However, dispersal would be the preferred solution.
Q2 - Please tell us if there are there any aircraft operational constraints that Exeter Airport should consider when planning its new inbound and outbound procedures? (restrictive speeds, distances, climb rates, rates of descent, etc.) Please provide details and reasons.
Your Response: We agree with the BHA in that:- if possible, a PinS approach for GA and helicopters in IFR would be allowed to do a 'proceed VFR' approach / cloud break that would not interact with CAT IFR traffic. Along similar lines, we would also ask that consideration is given to a HEMS PinS approach to the Royal Devon & Exeter Hospital in Exeter in the planning. (Could be difficult as the hospital in 3nm from the field and only just south of the FAT for RW 08)
Q3 – Do existing noise abatement procedures meet current and future local government and community requirements?
Your Response: We are not required to adhere to noise abatement procedures so no preference to this question.
Q4 - Are there any other local issues or constraints you feel should be considered by Exeter Airport that will guide the development of options for the geographical location of arrival and departure procedures at Exeter Airport?

Your Response: Whatever is decided, it should be implemented sooner rather than later. The airport is slowly being hemmed in by Exeter to the west and Cranbrook to the northeast. Any expansion could be limited by the rate of construction. We would also like to see the Exe estuary protected as an area of natural beauty.

Table 2 – Stakeholder Supplementary Questions

Are there other Design Principles that you feel should be considered?
Your Response: None that have not already been mentioned in this or the previous questionnaire.
If there are any other areas of concern that you feel have not been considered, please provide additional comments below.
Your Response: PinS approaches for GA and rotary traffic, and a HEMS PinS approach to the Hospital as mentioned.

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Table 1 – Initial List of Design Principles.

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In many urban locations you may feel it is important to protect quiet or open areas (e.g. parks) by designing flight procedures that avoid these areas. However, in large urban areas it may not be possible to avoid overflight of quiet areas and, at the same time, also avoid overflight of more densely populated areas. This may be because of the proximity of runways to urban areas or to the orientation of the runway itself.

1.4.4 Noise and Emissions

An aircraft flying a straight line directly from one location to another is the most efficient routing option because it represents the shortest distance and time between locations. When flying a longer route between the same locations (perhaps to minimise noise impacts in a sensitive area) the distance and time of the flight will increase, as will the fuel burn and associated emissions into the atmosphere. When answering the questions, please consider this balance between noise and emissions in general terms.

1.5 How to Respond

Please save the file that includes your responses and attach to an email to the following address:

acpexeterenquiries@exeter-airport.co.uk

In addition to the word file, we will accept scanned, hand-written responses or email responses as long as they are legible and clearly identify the question to which your response relates.

It is important that individual email responses clearly show your name and contact details; this will allow us to cross-refer to the emails we send out.

We will also accept legible postal responses to the following address within the timescales specified below:

Airspace Change Proposal
Exeter & Devon Airport Ltd
Clyst Honiton
Exeter
EX5 2BD

Please respond by mid-day Friday 6th September 2019.

2 Stakeholder Response

2.1 Your Responses

Please provide your responses in line with the information provided in paragraph 1.3. Please use as much space as you require, the size of the response box will expand as you type your response.

Representative Organisation:
for example: **Flybe**

Question
Q1 - Please tell us if the dispersal of noise impacts across a greater number of households is preferable than the concentration of noise impacts on a smaller number of households.
Your Response: **Flybe strives to minimise noise impact across all communities and has no further comment.**
Q2 - Please tell us if there are there any aircraft operational constraints that Exeter Airport should consider when planning its new inbound and outbound procedures? (restrictive speeds, distances, climb rates, rates of descent, etc.) Please provide details and reasons.
Your Response: **Flybe requests:** • **Continuous climb/descent** • **Design any initial turns (particularly lower levels on departure) in order that they can be flown at greater than 185kts to allow minimum flap departures (and thus reducing noise / improving track keeping).** • **Most direct routings with minimal track miles between airway and terminal procedure / departure**
Q3 – Do existing noise abatement procedures meet current and future local government and community requirements?
Your Response: **Flybe supports the use of noise abatement procedures in order to reduce noise to local communities and has no further comment.**
Q4 - Are there any other local issues or constraints you feel should be considered by Exeter Airport that will guide the development of options for the geographical location of arrival and departure procedures at Exeter Airport?

Your Response: **Flybe has no comment.**

Table 2 – Stakeholder Supplementary Questions

Are there other Design Principles that you feel should be considered?
Your Response: **Flybe fully supports implementation of PBN routing from airway to initial approach fix and departure via an instrument flight procedure to the airway. This will improve accuracy, reduce track miles and allow more efficient arrivals and departures.**
If there are any other areas of concern that you feel have not been considered, please provide additional comments below.
Your Response: **N/A.**

Table 3 – Additional Comments

Exeter Airport Airspace Change Proposal

Design Principles – Supplementary Questionnaire

The response of the British Gliding Association represented by the Bath, Wilts and North Dorset Gliding Club. Sept 5th 2019.

Document Details

Reference	Description
Document Title	Exeter Airport Airspace Change Proposal
	Design Principles – Supplementary Questionnaire
Document Ref	71189 023
Issue	Issue 1
Date	6th August 2019
Client Name	Exeter & Devon Airport Ltd

Issue	Amendment	Date
Issue 1	Initial	6th August 2019

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1 Exeter Airport Airspace Change Proposal

1.1 Introduction

Exeter Airport is very grateful to those stakeholders who have already engaged with the process and for all of the views that have been provided by the various representative bodies and individuals. We now need your further help. During the recent engagement activities i.e. the stakeholder questionnaires sent out in April, and the Focus Groups held in June, at least two stakeholder organisations raised questions about why Exeter Airport was not considering changes to arrival and departure routes at the airport.

Exeter and Devon Airport Ltd (EDAL) is committed to following Civil Aviation Authority[1] (CAA) guidance described in CAA Publication (CAP) 1616. CAP1616 requires the Sponsor (in this case EDAL) to consider **all possible options** for the airspace change, including those identified or proposed by stakeholders and including any radical options identified during the project.

Therefore, following advice from the CAA, EDAL has broadened the scope of this Airspace Change Proposal (ACP) to enable the Airport to consider, without prejudice or commitment, the introduction of Performance Based Navigation (PBN) arrival and departure routes, linking the current PBN approach procedures with the en-route airways entry and exit points. These routes will improve predictability of aircraft tracks which may increase safety for all airspace users.

This change to the ACP scope does not commit EDAL to implementing PBN approaches as part of the ACP, only that we are required to consider and assess it as part of the CAP1616 options development process.

1.2 Initial List of Design Principles

The various responses received to the initial questionnaires and focus group meetings has helped Exeter Airport to derive an initial list of Design Principles, as shown in Table 1 below, that will be used as the qualitative framework against which the possible airspace design options will be developed.

Proposed Design Principle
Any new airspace should not restrict flying operations in or around the airspace
Airspace should be designed to minimise the impact of noise
Any new airspace should not create funnelling or choke points for other airspace users
Airspace should connect to the airways structure to protect Commercial Air Transport

[1] The CAA is the independent civil aviation regulator.

Any new airspace should use the minimum volume necessary
Any new airspace should facilitate continuous climb and descent profiles
Any new airspace should allow equitable access to all airspace users
Consider the Flexible Use of Airspace
New airspace should protect critical stages of flight
Create a known traffic environment
Designs should consider areas of local tranquillity
Accommodate traffic with limited/no Radio Capability
Accommodate traffic without Transponder Capability
Any new CAS should be proportionate to the requirement
Any new airspace should use the minimum categorisation necessary
Any new airspace should be as uncomplicated as possible

Table 1 – Initial List of Design Principles.

1.3 Stakeholder Response Requirements

Given the change in scope of this project, Exeter Airport would like to re-engage with its local stakeholders to see if their views have changed. Whilst some of the Design Principles listed in Table 1 will be pertinent to airspace designs that include flight procedures, stakeholders may wish to provide different answers or views to their original questionnaire returns. Exeter Airport would like stakeholders to assist in the development of the Design Principles in the following way:

- Provide any updated responses to the original Design Principles questionnaire that was distributed in late-April, based on the inclusion of PBN arrival and departure routes (We have not included a copy of the original Design Principles Questionnaire; if you would like a copy to be sent, please get in touch via the e-mail address below).

- Provide answers to the additional questions in Table 2 below.

- Please complete Table 3 to suggest any new Design Principles that you think would be relevant to the change in scope of this Airspace Change Proposal and should be considered by Exeter Airport. Please also state any areas of concern that you feel have not been considered during this process.

1.4 Points for Your Consideration

The following points for consideration provide some further explanation that may help you when considering your responses with respect to the inclusion of Instrument Flight Procedures at Exeter Airport.

1.4.1 Performance Based Navigation Procedures

PBN procedures make use of satellite technology to better guide aircraft over the intended track across the ground. When using routes defined by accurate Global Navigation Satellite System (GNSS) waypoints, it is important to understand that aircraft will follow the new published routes more accurately and consistently than they currently follow conventional routes. This improved track-keeping accuracy means aircraft will be less dispersed either side of each route. Therefore, fewer locations will be directly overflown, but there will be an increase in the concentration of over-flights in those areas directly beneath the new published routes. It may therefore be possible to formulate designs that minimise the numbers of new people overflown by designing procedures over less populated areas, or by designing procedures that distribute noise over different areas, i.e. over more people, but at less frequent intervals.

1.4.2 Urban and Rural Areas

You may wish to consider the advantages and disadvantages of designing routes that are planned to overfly either urban or rural areas. Flights over more sparsely populated areas may seem to be the best alternative. However, you may also wish to consider the levels of background noise when balancing the urban and rural alternatives. Aircraft flying over urban areas will pass over a larger number of people and residences. However, in urban areas the levels of background noise are likely to be much higher than in rural areas. Consequently, aircraft noise may be masked because of higher noise levels associated with traffic and many other background activities common in urban locations.

1.4.3 Open Areas

In many urban locations you may feel it is important to protect quiet or open areas (e.g. parks) by designing flight procedures that avoid these areas. However, in large urban areas it may not be possible to avoid overflight of quiet areas and, at the same time, also avoid overflight of more densely populated areas. This may be because of the proximity of runways to urban areas or to the orientation of the runway itself.

1.4.4 Noise and Emissions

An aircraft flying a straight line directly from one location to another is the most efficient routing option because it represents the shortest distance and time between locations. When flying a longer route between the same locations (perhaps to minimise noise impacts in a sensitive area) the distance and time of the flight will increase, as will the fuel burn and associated emissions into the atmosphere. When answering the questions, please consider this balance between noise and emissions in general terms.

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Please respond by mid-day Friday 6th September 2019.

2 Stakeholder Response

2.1 Your Responses

Please provide your responses in line with the information provided in paragraph 1.3. Please use as much space as you require, the size of the response box will expand as you type your response.

Representative Organisation:
The British Gliding Association represented by The Bath, Wilts and North Dorset Gliding Club.

Question
Q1 - Please tell us if the dispersal of noise impacts across a greater number of households is preferable than the concentration of noise impacts on a smaller number of households.
Your Response: No opinion given
Q2 - Please tell us if there are there any aircraft operational constraints that Exeter Airport should consider when planning its new inbound and outbound procedures? (restrictive speeds, distances, climb rates, rates of descent, etc.) Please provide details and reasons.

Your Response: If PBN routes need to be contained within some form of controlled airspace then we repeat our previously stated concerns that the **volume** of controlled airspace should be the minimum possible and that it's **location** should be in areas giving the least intrusion in into the activities of GA in general and Gliding in particular. The position and operations of the **Devon and Somerset Gliding Club** should be protected to the greatest extent possible by vectoring traffic to the south of Exeter Airport for all operations. The routes flown historically by gliding cross-country pilots should not become part of controlled airspace of any sort, nor should PBN routes be routed through them. These routes have been previously advised, and for clarity are generally immediately to the north of the A30 near Exeter to the north Devon coast, with tracks from and to the east and west. We wish to remind EDAL that aircraft designed-track information can be incorporated at minimal cost into software driven in-flight displays regularly used by glider pilots and GA pilots. An example of this is in use at Cambridge Airport, and operates well without the need for controlled airspace to enforce it. We recommend that EDAL should consider such methods as a way of minimising the need for controlled airspace and of working with the local GA community for mutual benefit.
Q3 – Do existing noise abatement procedures meet current and future local government and community requirements?
Your Response: No opinion given
Q4 - Are there any other local issues or constraints you feel should be considered by Exeter Airport that will guide the development of options for the geographical location of arrival and departure procedures at Exeter Airport?
Your Response: No opinion given

Table 2 – Stakeholder Supplementary Questions

Are there other Design Principles that you feel should be considered?

Your Response: We are concerned that other airspace redesign work is in hand in the southern part of the UK under the umbrella of FASI South, but see no evidence that Exeter Airport is part of that project. The 16 airports are working together to try to minimise overlap and conflict. The statement from Southampton Airport's current CAP 1616 consultation is as follows. **The Airports and NATS are working closely together to ensure that their individual ACPs are aligned and the final set of changes can be combined seamlessly to form a safe and efficient network.** Bristol Airport, a near neighbour of Exeter, is part of this process. We are concerned that EDAL may be working in isolation and could produce a less than optimal design which could have unnecessary consequences for GA. We suggest that full co-ordination with other local airports should be incorporated as a design principle.
If there are any other areas of concern that you feel have not been considered, please provide additional comments below.
Your Response: No opinion given

Table 3 – Additional Comments